



Questions and Answers

SYNOD QUESTIONS

Jonnie Baird – Devizes

Question 1

The Salisbury Registrar and Diocesan Safeguarding Officer (DSO) take the view in our Diocese that "PCCs are, by definition, charities working with children and vulnerable adults" and "every PCC is therefore a children and vulnerable adults' charity".

Consequently, they have opined that all PCC members in the Diocese of Salisbury are now required to obtain enhanced DBS checks (without barring list disclosure).

For vast swathes of parishes (& possibly the majority), their assumption is manifestly false. Simply, there are no vulnerable adults and children probably only come to church (with their parents) either for the Christmas carol service and/or the Harvest Festival and lunch.

Consequently, they are:

- i) imposing on aged, sparse & ragged volunteers an additional, onerous & intrusive administrative burden (including the potential requisite completion of Confidential Declaration Forms);*
- ii) contradicting the House of Bishops' Code of Practice, which states in paragraph 4.8.2.3 that "If an Enhanced DBS (with/without Barred List/s) check is requested, church bodies must ensure that the role meets the eligibility criteria for this and allows a DBS application to be submitted." It further warns that "It is essential to ensure that the law allows for a DBS check application to be submitted at the appropriate level. A church body asking an individual to apply for an Enhanced DBS (with/without Barred List/s) check has a legal responsibility to ensure that the role is eligible and can explain what parts of legislation support the application. The DBS may require an explanation as to why eligibility exists." Furthermore, it states that "It is a criminal offence to carry out Enhanced DBS (with/without Barred List/s) checks on roles that are not eligible. Church bodies that carry out illegal checks may not only be committing an offence under Part V of the Police Act 1997 but are also likely to be in breach of data protection legislation";*
- iii) in so doing, encouraging PCCs to potentially break the law; and*
- iv) overreaching themselves as PCCs are separate and independent charities, have their own fiduciary and statutory duties and are required, as a matter of church law, to comply with the House of Bishops' Code of Practice (which cannot be overridden by diocesan guidance). Additionally, paragraph 4.8 states that "There are no eligibility requirements attached to Basic DBS checks and their use is left to local determination."*

As a matter of priority, can the Diocese please revise forthwith its safeguarding advice to PCCs?

Answer: Suzy Fitcher, Director of Safeguarding and DSO

The Diocese recognises the important contribution that PCC members make, often as volunteers in small parishes with limited resources, and understands the concerns about introducing additional administrative requirements. We also recognise the importance of ensuring that any DBS checks requested are lawful and comply with statutory and Church of England legislation.

Our starting point is that we want our churches to be safer places for everyone, places where children and adults can participate in the life of the Church, access support and feel safe, valued and respected. Safeguarding is not simply about responding when something goes wrong; it is also about creating the conditions in which people are protected from harm and can have confidence in the Church.

We recognise that the circumstances and activities of individual parishes vary considerably. However, we must also recognise that safeguarding needs are not always visible, and that the absence of children or adults with apparent support needs at regular services does not necessarily mean that a church has no safeguarding responsibilities towards them.

It is in this context, and having sought legal advice, that the Diocese issued its guidance to PCCs on DBS checks for trustees. Thank you for your question and I welcome the opportunity to explain the rationale for the advice and to address the questions raised about eligibility, proportionality and the responsibilities of individual PCCs.

Advice to PCC's as separate charities

Each PCC (and Leadership Teams in the deaneries of Guernsey and Jersey) are separate charities and the Diocesan Safeguarding Team can only offer advice rather than require them to act in certain ways. To this end, it is not correct that the Diocesan Board of Finance has 'required' PCC members to obtain Disclosure and Barring Service (DBS) checks. However, we have advised PCC's themselves to make it a requirement for their members to complete a DBS check.

Here is a copy of the advice that was issued and the reasons for this advice:

Having sought legal advice, we are advising PCCs to make it a requirement that all PCC members complete a DBS check to the level of Enhanced Child and Adult (but without Barred lists).

Below are the reasons why:

1. All PCCs are, by definition, charities working with children and vulnerable adults.

The broad purpose of a PCC (as set out in section 2(2)(a) of the Parochial Church Councils (Powers) Measure 1956) is to promote in the parish "the whole mission of the Church, pastoral, evangelistic, social and ecumenical." We have taken "the whole mission of the Church" to include working with vulnerable adults and children. Every PCC is therefore a children and vulnerable adults charity.

Although there may be no children or vulnerable adults in the church at the moment, is to miss the point; the purpose of the church (amongst other things) is to work with those groups, so it must be

ready to receive and work with those groups at any point. The nature of the charity does not change just because it isn't currently working with anyone in those groups.

This will be the case regardless of the size of the charity/PCC and includes those registered with the Charity Commission, and those not yet registered.

2. PCC members are therefore eligible for an Enhanced DBS check without a barring list check, because they are trustees of a charity for children or vulnerable adults.

This is spelt out in the DBS guidance in the following places:

[*Working with children in the charity sector and overseas aid organisations: Trustees of children's charities*](#)

[*Working with adults in the charity sector and overseas aid organisations: Trustees of adults' charities*](#)

3. If an individual PCC member is also working directly with vulnerable adults or children, that individual is eligible for an Enhanced DBS check with a barring list check for the relevant group (children or adults).

So, for example, a PCC member who also works in a children's holiday club would be eligible for an Enhanced DBS check with a barring list check for children.

The Diocesan Safeguarding Team would advise PCC's to make this transition in a planned and realistic manner. Aiming to implement it within a year, and/or considering tying it in with the appointment of new PCC members, might be a realistic approach for your context.

Within Guernsey and Jersey, there are no PCCs, and the advice would be for all charity trustees within the leadership team to have a DBS check.

The safeguarding context in our parishes

It is important not to assume that a church is not working with children or vulnerable adults simply because no children regularly attend services, or because the needs of adults within the congregation are not immediately apparent.

Churches are part of their wider communities and have a pastoral, social and charitable purpose that extends beyond those who regularly attend Sunday worship. For example, some parishes have no children attending on a Sunday but have volunteers who visit local schools as part of Open the Book. People may approach their church for support during periods of crisis, bereavement, ill health, isolation or family difficulties. Other people within the parish may be experiencing abuse or neglect that is not visible to those around them.

National statistics illustrate the scale of these issues. There are around 9.8 million disabled people in England representing 17.7% of the population^[1]. Approximately one in four people has experienced domestic abuse^[2]. Roughly one in five adults in England have a common mental health condition^[3], and around one in six people over the age of 80 have dementia.

These figures do not mean that everyone affected automatically meets the Church of England's definition of a vulnerable adult. They do, however, demonstrate why it would be unsafe to assume that safeguarding needs are absent simply because they are not immediately apparent.

Safeguarding is not solely a response to concerns that have already arisen. It is also about ensuring that our churches are prepared to welcome, support and protect people who may need help, including those who may not feel able to disclose their circumstances.

Our safeguarding casework also provides an important local perspective on the needs arising across the Diocese with a breadth of safeguarding issues encountered by the Diocese.

The advice to PCCs has been developed in light of legal advice and national DBS eligibility guidance. We recognise that implementing safeguarding requirements can create additional work for volunteers, particularly in smaller parishes. Our intention is to ensure that appropriate safeguarding arrangements are in place across the Diocese, while supporting PCCs to understand and implement their responsibilities proportionately and lawfully.

Conclusion

For the reasons outlined above, and having sought and confirmed the legal advice received, the Diocesan Safeguarding Team's position is that PCCs are charities working with children and vulnerable adults, and that their trustees are therefore eligible for Enhanced DBS checks at the level of children and adults, without barred list checks. This advice is based on the purpose of PCCs under the Parochial Church Councils (Powers) Measure 1956, relevant DBS guidance concerning charity trustees, and the Church of England Safeguarding Code of Practice.

The Diocese recognises the importance of ensuring that DBS checks are requested lawfully and in accordance with the House of Bishops' Code of Practice. Having reviewed the concerns raised and confirmed the legal advice underpinning our position, we do not consider that a revision to the advice issued to PCCs is necessary.

We recognise, however, that implementing this advice may present practical challenges, particularly for smaller parishes with limited resources and volunteers who already carry significant responsibilities. We will continue to support PCCs to understand their safeguarding responsibilities and to implement the advice in a planned and realistic way.

Our priority is to work together across the Diocese to make our churches safer places for everyone. This means not only responding appropriately when concerns arise, but also creating environments where children and adults can participate in the life of the Church, access support and feel safe, valued and respected.

Thank you for raising this question. It provides an opportunity to clarify the basis of our advice and to reaffirm our shared commitment to safeguarding across the Diocese.

^[1] Census 2021 - [Disability, England and Wales – Office for National Statistics](#)

^[2] The Office for National Statistics estimates that approximately one in four people aged 16 and over in England and Wales has experienced domestic abuse since the age of 16. [Domestic abuse prevalence and trends, England and Wales – Office for National Statistics](#)

^[3] NHS England Adult Psychiatric Morbidity Survey 2023/4 [Adult Psychiatric Morbidity Survey: Survey of Mental Health and Wellbeing, England – NHS England Digital](#)

^[4] Charity Commission - [Safeguarding and protecting people for charities and trustees – GOV.UK](#)

Question 2:

Putting together information from written answers and the latest accounts, the glebe portfolio amounts to £14.3 million, produces about £140,000 in rent and costs £59,000 in agents' fees to service. This produces an income return of 0.006% (by contrast, the DBF is seeking an RPI plus 4% return on its other investments). Agricultural land prices have been flat for several years and look set to fall in future. The DBF holds approximately 11% of its assets in agricultural land (while the Church Commissioners, for instance, only holds 5.5% in that category). The issue of better management of glebe assets (including divestment) has been raised annually with the DBF chair since October 2024 and the only material response has been that the management of the portfolio recently has been put out to tender.

Has any professional advice actually been sought in the last two years concerning:

- (1) the relative merits of continuing to hold a high proportion of the endowments in agricultural land; and*
- (2) the potential granular realisation of development premium latent in the individual parcels of land?*

If so, what was the advice and what action is being taken to actively and boldly implement it?

Answer – Elizabeth Harvey & David Pain

Over the last two years the DBF has drawn on the professional assessment of the whole glebe portfolio undertaken in by our agents Strutt Parker in 2021, including the land identified as having potential development opportunities. In light of this a small number of sites are being pursued for development potential. The DBF is exploring the sale of a small number of sites adjacent to schools to the DBE.

No separate external professional review of the glebe portfolio has been commissioned in the last two years. The DBF has taken advice through members of the Finance & Resources Committee and the Investment Review Group who have relevant professional investment, property and land expertise. Their input informed the DBF's 2025 Asset Management Review.

The 2025 Asset Management Review assessed the composition, yield and liquidity of the DBF's asset portfolio and informed the Asset Management Strategy agreed by the Trustees (Bishop's Council) in July 2025. That review found that glebe produced the lowest total return across the main asset classes, compared to the renting out of vacant properties and returns from externally managed investments over the relevant five- and ten-year periods.

The agreed strategy is therefore to reduce the DBF's concentration in property and land and

increase the proportion held in higher-yielding, more liquid managed investments. The current five-year plan provides for the sale of approximately £5.5 million of glebe, around 38% of the portfolio, with the proceeds reinvested in line with the DBF's investment objectives and risk appetite. Both the glebe and its sale proceeds form part of the Diocesan Stipends Capital Fund and must therefore continue to support the cost of clergy ministry.

However, the approach is not simply to dispose of glebe land to maximise financial return. As an agricultural landowner in Dorset and Wiltshire, the DBF recognises that glebe land can also support its wider charitable objectives. This includes contributing to climate action and the transition to net zero and considering appropriate opportunities to use land in support of justice priorities, including social housing and our commitments to Gypsy, Roma and Traveller communities. Decisions about retention, disposal, development and alternative use will therefore balance financial yield with the environmental and social value that the land can deliver.

The DBF is in the process of retendering the glebe management contract. No new parcel-by-parcel professional assessment of latent development premium has been commissioned across the whole portfolio in the last two years. Once the new land management agent has been appointed, a fresh strategic review and proactive management of the portfolio, including detailed consideration of development potential where appropriate, will be a core requirement.

The DBF expects the new agent to improve sustainable income and yield, protect and grow long-term capital value, identify opportunities to improve, develop or repurpose underperforming assets, recommend disposals where capital could be used more effectively elsewhere, and support strategic reinvestment to strengthen the portfolio over the long term.

[Chris Grasske – Rector at Eggardon & Colmers](#)

Clergy as well as lay people are championing environmental standards across the diocese and I commend all the work that is being done. Eco-church is a good idea and many churches are making good progress in achieving net zero. It is one of the five strands of making Jesus known in the diocese.

Clergy housing is often far behind the environmental standards of churches. The houses are owned by the diocese and the responsibility for their maintenance rests with the diocese. I understand that we are in the process of moving to a contracted out model for maintenance and upkeep and I understand that budgets are tight.

The background to this question is that there were some churches with no heating last winter because of the cost of implementing net zero solutions. In the spring when the oil fired boiler in my Vicarage was serviced, the Engineer deemed it had reached end of life. It took 24 hours to approve a direct replacement and three weeks to fit a new one. Whilst I am grateful for this swift work, it has left me asking why the opportunity and money spent on replacing the oil fired boiler was not spent on a more environmental solution in line with the current church standards

My questions are:

1 "What are the plans and the budget for updating clergy housing to the same eco-standards as churches?"

and

2. *"What percentage of clergy have switched to Electric vehicles and what is the policy towards installing electric vehicle charging points in clergy housing, when they become part of the property and need to be left behind when clergy move on?"*

Answer 1- David Pain.

The tendering process for the management of our clergy homes is near completion and a contract for services will be signed shortly. Once the contract is signed clergy will be briefed with full information on how to access services and report issues. In the meantime, the normal contacts for emergency issues remain in place.

With our new supplier we will also start to work on a number of wider changes to the property portfolio, including improving our homes to achieve eco-standards.

The Scope of Services for the outsourced clergy housing provision sets out the intention to assess and improve the energy performance of the housing portfolio in line with the Church of England's Net Zero 2030 commitment.

As part of the new arrangements, the appointed provider will be required to complete outstanding EPC assessments, assess the cost of achieving Net Zero compliance and make recommendations for properties with poor energy ratings, including the feasibility of improvements or appropriately timed disposal where appropriate. The provider will also be expected to deliver or manage a programme of Net Zero upgrade works as instructed by trustees.

The wider Clergy Housing Review recommends a five-year programme of property improvements, supported in part by the planned disposal of approximately 34 properties, with proceeds reinvested in the retained portfolio.

The overall approved budget envelope for clergy housing is currently £3 million per annum, covering all associated costs. In light of the need for improvements to homes the Bishops Council has already ringfenced an additional £1m expenditure to help close the gap but further changes will need to be funded by focusing on having fewer and better homes.

The detailed investment required, prioritisation of works and delivery programme will therefore need to be established through the EPC assessments, costed recommendations and subsequent trustee decisions

Answer 2- David Pain

We do not have data on clergy vehicle ownership. We do not yet have a formal register of clergy homes with EV points yet, but informally estimate around 20 of our homes do, less than 10%. Quinquennial inspections are starting to gather this information.

Since 2023 we have approved 6 installations of charging points, and it has been our practice to offer a 50% grant for clergy to install an EV charge point when requested. This equates to 50% of the balance of costs after the central Gov grant of £500 has been taken off. The average total cost before grant is around £900/£1,000 so we are offering around £250.

Oliver Illiffe

Question 1

Can the Registrar confirm, for the benefit of all PCCs in the diocese, that enhanced DBS checks as well as confidential declaration forms (see section 5.3.2 of the House of Bishops' Code of Practice) are required for all PCC members, regardless of the nature of the activities they are actually responsible for, and that an assessment of the eligibility criteria under section 4.8.2.3 of the House of Bishops' Code of Practice (or any equivalent legal requirement) is not required when applying for enhanced DBS checks for PCC members?

Answer – Gavin Foster, Joint Diocesan Registrar

I have read Suzy Fatcher's response to Jonnie Baird's question, which sets out the Diocesan Safeguarding Team's advice to PCCs in this area.

I can confirm that I have given legal advice that all PCC members are eligible for an Enhanced DBS without Barred List check; that making such a request is compliant with paragraph 4.8.2.3 of the Safeguarding Code of Practice (*Safer Recruitment and People Management Guidance*); and that it is not illegal or unlawful to request such a check.

Question 2

Please would the DBF Chair supply data showing the cost per hour in both direct ministry costs and notional cost of ministry support and training for which the DBF is liable for each of:

1. *stipendiary clergy;*
2. *licensed lay ministers (LLMs);*
3. *lay worship leaders (LWLs); and*
4. *retired and volunteer clergy with PTO;*

based on the following assumptions:

- (a) *stipendiary clergy are available for pastoral care and other duties for a standard working week of*

40 hours for 46.4 weeks per year (unless stipulated otherwise);

(b) a reasonable estimate of preparation time (disclosed in the answer) for the average number of services actually led by individuals in categories 2 to 4 above; and

(c) costs of training and commissioning actually met by the DBF for each category for 1 to 4 above to be allocated based on the average total hours of service of individuals in each category.

Answer – Jane McCormick DBF Chair

Clergy are office holders rather than employees. Their responsibilities are defined by the duties of the office, not by contracted hours, and Common Tenure does not establish a standard working week. References to 'standard working week' are therefore best understood as an indicative assessment of the time likely to be required to fulfil the duties of a particular office, rather than a record of hours worked. There is also no necessary relationship between a stipend and an hourly commitment: the stipend is the amount offered by the diocese and accepted by the office holder for undertaking the office.

In addition, clergy, bishops, archdeacons, DBF staff and others involved in supporting ministry do not record their time against individual ministry roles. Licensed lay ministers, lay worship leaders, retired clergy and clergy with permission to officiate generally exercise voluntary ministry, with their availability agreed locally according to the needs of the parish and what each person is willing and able to offer. Any assumptions about hours, service preparation or length of service would therefore be unsupported and could produce misleading comparisons.

The total investment in each form of ministry also extends beyond activity undertaken in a particular year. It may include discernment and initial training, housing and stipend costs where applicable, ongoing ministerial development, episcopal and archidiaconal oversight, pastoral support from incumbents and administrative support from Emmaus House and the area offices, and, for stipendiary clergy, pension obligations extending beyond active ministry. These costs vary significantly between individuals and forms of ministry. Ordained training may, for example, involve full-time residential theological education or part-time non-residential study, whereas training for a licensed lay minister is c.£6k over three years. Training for lay worship leaders and lay pastoral assistants is often provided locally by the incumbent, with more limited direct expenditure but a substantial investment of time.

The [2027 Diocesan budget guide](#) and [Detailed numbers](#) records the costs incurred in supporting ministry across the Diocese, and the chart in the budget guide on page 3 shows how more than 1,500 people contribute through different forms of ministry. It does not, however, provide a reliable basis for converting those costs into a comparable hourly rate.

Responding completely to this question would first require agreement on the purpose of the exercise, the definitions and assumptions to be used, and how the resulting figures would inform decision-making. Given the absence of timesheet data, the complexity of allocating shared and lifetime costs, and the further reductions in staffing at Emmaus House, additional resource would be required to undertake that work robustly.

BUDGET QUESTIONS FROM OCTOBER 7TH MEETING

For information, the following are the questions raised by Synod members and others at the pre Synod briefing meeting held on October 7th.

1. **How will the planned reduction in clergy posts be achieved? Will there be redundancies?**

Answer: The intention is to manage numbers through long-term planning, natural vacancies, retirements, and reshaping ministry rather than through a programme of clergy redundancies. The Diocese is planning for 120 stipendiary clergy by 2032 and will use a mix of team ministries, self-supporting ministry, house-for-duty posts, and other forms of ministry to meet future needs.

2. **Will the Shared Ministry Fund make it harder for parishes to support the idea of contributing financially when they have less access to a local vicar?**

Answer: The Diocese acknowledges this concern but emphasises that ministry is increasingly delivered through wider teams rather than individual clergy posts. The Shared Ministry Fund is intended to support ministry across the Diocese, ensuring all communities can access ministry, including those unable to fund it locally.

3. **Is there a plan to maximise income from Glebe land and development opportunities?**

Answer: Yes. The Diocese has recently tendered for new management support and is actively seeking development opportunities within the Glebe portfolio. While significant windfalls are not expected due to the nature of the landholdings, the Diocese is pursuing a more proactive approach than previously.

4. **Is there a strategic plan for reducing posts while preserving ministry across different communities?**

Answer: Rather than a detailed one-size-fits-all plan, the Diocese is adopting a culture of collaborative and team-based ministry. Decisions will reflect local circumstances while ensuring ministry is available across all communities, including areas of deprivation.

5. **How will ministry be sustained in less affluent communities?**

Answer: The Shared Ministry Fund is designed to pool resources across the Diocese so that ministry is not dependent solely on local wealth. Additional support for deprived communities is being increased, with funding for deprivation relief rising by 50% in the 2027 budget proposals.

6. **Is there a maximum number of parishes that should be included in a team ministry?**

Answer: No fixed number was identified. The Diocese's view is that the appropriate size of a team depends on available resources, local circumstances, clergy capacity, and where ministry is most needed.

9. **What is the strategy for the central team in supporting ministry, and who is in the team?**

Answer: The central team has undergone significant restructuring to focus on enabling and resourcing local churches. New and externally funded teams are supporting mission, younger generations, and parish development. The Diocese recognised the need for better communication about team structures and committed to providing clearer information about roles and responsibilities.

10. **Why is Parish Share being renamed the Shared Ministry Fund?**

Answer: The change is intended to better reflect what the funding supports. The Diocese believes the new name emphasises the shared responsibility for ministry across all communities rather than creating the impression that contributions simply pay for individual clergy posts.

11. **Are parishes that do not pay their full share simply choosing not to contribute?**

Answer: No. It was acknowledged that many parishes would like to pay more but genuinely lack the financial resources to do so, despite efforts to increase giving.

12. **Could church buildings close as part of future sustainability planning?**

Answer: The Diocese indicated that this is a question some parishes are already asking. Work is underway to help churches assess the sustainability and future use of buildings, particularly where attendance is very low. No specific closure programme was announced, but the issue is being actively considered.