

Frequently Asked Questions – Changes to the definition of Regulated Activity when working with children and young people and the impact on the level of DBS check required

September 2026

Since the announcement of the change to DBS requirements for those working with children and young people, we have collated the questions we have received and have shared the answers below.

1. Does it matter whether the worker or volunteer is helping with several different ministries or just one when we consider their eligibility for a Barred List check?

No, in deciding whether a worker or volunteer needs a new DBS check with Barred List you should consider all of their roles working with children and young people and whether these activities amount to more than 3 days in a 30-day period or happen overnight.

2. Does the frequency requirement only relate to the volunteer or worker's work within the church?

Yes. When undertaking a DBS check for a church role, you only need to consider the person's work within the church setting. Although the Government guidance suggests that organisations should include work with children and young people in other settings when calculating the number of days worked, the DBS has confirmed that this advice applies to education settings. You therefore do not need to include work undertaken in other settings.

3. Can workers or volunteers continue in their role whilst waiting for the new DBS check to come through?

Yes, so long as they have a current enhanced DBS check which has been issued in the past 5 years they can continue with their role.

4. What happens if a worker or volunteer declines to undergo an updated DBS check with Barred list?

In this case, the worker or volunteer should not continue in their role without the updated check having been completed. You can seek advice from your Regional Safeguarding Lead if you are unsure about this situation.

- 5. If a worker or volunteer has an enhanced DBS check through another organisation and they are on the DBS Update Service, can we use the DBS Update Service rather than starting a new DBS check?**

Yes, you will need to see the original DBS certificate with the Barred List on it and then go through the Update Service checking process as usual.

- 6. What do we do about DBS check for workers and Volunteers who do not meet the frequency requirement for a Barred List Check?**

Volunteers with children and young people who don't meet the frequency requirement of working with children and young people on more than 3 days in any 30-day period will still need an enhanced DBS check but without the Barred List check.

- 7. Do volunteers with the Parent and Toddler Group need to have a DBS check with Barred List?**

No, although they should still have an enhanced DBS check without Barred List. They do not need a Barred List check because the children are primarily supervised and supported by their parent or carer during the group meetings and events. It will be their parent or carer who should respond to any care and support need during the group.

If the volunteer also helps with other groups for children and young people where parents are not present, and this amounts to more than 3 days in a 30-day period, then they will need a DBS check with Barred List – this will cover the work with the Parent and Toddler Group as well (there is no need for another DBS check without Barred List).

- 8. If a volunteer helps with holiday club every year in the summer holidays but does not volunteer with children and young people at any other time during the year, should I be undertaking a new DBS check with Barred List now?**

No, you don't need to undertake a new DBS check now for someone who is not going to be in regulated activity until August 2027. However, it would be a good idea to ensure that you set a reminder to start the process in May or June 2027 and that this check included a Barred List check if they are volunteering on more than 3 days of the holiday club, or overnight.

- 9. If a volunteer or worker only steps in to help when another person is unwell or on holiday do they need a DBS check with Barred List check just in case?**

They would only need a DBS check with Barred List if they were going to be working with children and young people on more than 3 occasions in any 30-day period or overnight.

- 10. Do church trustees need a DBS check with Barred List?**

No, church trustees do not need a DBS check with Barred list unless they also have a role working in regulated activity with children and young people on more than 3 days in any 30-day period, or overnight.

If you have any further questions, please do contact your Regional Safeguarding Lead.

**The National Safeguarding Team
September 2026**