

# Briefing paper

## Regulated activity definition loopholes in faith settings

Published: 20<sup>th</sup> May 2025

### Summary

**Significant gaps exist in the current definition of regulated activity within faith communities. Addressing these issues is crucial for safeguarding children and vulnerable individuals.**

Organisations have a legal and ethical responsibility to protect those in their care, but the current loopholes mean that many volunteers and workers who have unsupervised access to children are not subject to enhanced DBS checks due to the frequency of their role, increasing the risk of harm. Faith leaders and other trusted figures may not be properly vetted, leading to misplaced trust.

Similar issues are present where the irregularity and informality of faith settings mean they are not consistently classified as regulated activity. Clarifying and expanding the definition of regulated activity would ensure comprehensive safeguarding across all contexts, including faith-based settings, and help educate these groups about their responsibilities, leading to better protection for children and vulnerable individuals

### Examples from faith settings of loopholes in the current definition of regulated activity:

- Sunday schools, children's/youth groups
- Toddler/playgroup, stay-and-play group
- Silent mode (Islam)
- Supplementary Schools, language classes, cultural teachers
- Kirtani/Raagi (Sikhism)
- Caretakers for places of worship and community centres
- Residentials, holiday camps and events
- Kitchen/Seva volunteers
- Itinerant preachers, visiting religious figures or speakers
- Faith leaders
- Granthi (Sikhism)

#### ► Sunday school - children's groups - youth groups

**Most faith communities operate some form of children's work and/or youthwork which are a valued service in the community. Many contexts do this on a regular basis, usually weekly, and rely on volunteers.**

Volunteers will often be working with children on a rota basis which may run monthly or less than four times a month. Under the current definition, this frequency would not be classed as regulated activity.

Most faith-based organisations lack the resources to employ a regular children's worker to be present every week. The number of organisations that have a paid worker or head volunteer with a specified role description and contract every week is low, and it is not guaranteed that someone involved in regulated activity will be present each week.

This is the same for youth groups. Volunteer youth workers that do operate on a weekly basis in smaller or less structured faith communities, may be unaware they are working

in regulated activity even though they have unsupervised access to children.

*In Scotland 'providing religious activities or services for children' is specifically mentioned as a regulated role with children. This provision for faith settings is not available under the current definition of regulated activity which appears to read as though created for healthcare and education settings.*

## ► **Toddler groups - playgroups - stay-and-play groups**

**The same challenge exists for Toddler groups or playgroups run in faith communities as they also usually operate on a rota basis.**

Currently, in toddler groups when a parent or carer is present, the volunteers are not classed as being in regulated activity or eligible for an enhanced DBS check. Volunteers still have access to children and are perceived by parents as safe in these positions.

## ► **I'tikaf silent period (Islam)**

**I'tikaf is a silent mode of prayer and reflection which individuals undertake in mosques during the last 10 days of the holy month of Ramadan. This is usually participated in by men, but owing to the sanctity of the period, children and young people may engage with this practice.**

This religious period leaves the supervision of children in the care of the adults present (sometimes not their parents) and includes overnight residency. Due to the informal and long-established traditional nature of the I'tikaf, many Islamic venues would not identify this as regulated activity and therefore would not obtain the relevant level of disclosure checks. This is due in part to a lack of understanding around regulated activity and the nuance of the I'tikaf, making it more complex to identify.

## ► **Supplementary schools - language classes – cultural teachers**

**Supplementary schools are run by community-led groups and/or places of worship that focus on delivering education to enhance language, culture and/or religion for children.**

**Cultural teachers operate out of Mandirs (Hindu temple) or Gurdwaras (Sikh's place of worship) and lead classes in classical dance, martial arts or Punjabi/Sanskrit.**

The regularity of supplementary schools/language classes and groups run by cultural teachers varies, as does the location. These activities can take place in places of worship, community centres, school premises and even in family homes due to a variety of reasons, be it the informal nature of provision, venue costs or ease of accessibility. Due to the irregularity and the informality of these activities they provide a loophole for regulated activity.

If these activities operate on a weekly basis and workers or volunteers have unsupervised access to children, they would be classed as regulated activity. However, many religious groups are unaware of the definition for regulated activity and so do not obtain the relevant background checks.

## ► **Kirtani/Raagi (Sikhism)**

**This role leads kirtan (devotional singing) on stage and often double up as harmonium or table (small drums) teachers, often interacting with youth groups, young children and music learners in music classes. They move about the country to undertake this role.**

These individuals will stay within the Gurdwara complex between several days or up to a month and so have access to children who attend the Gurdwara for classes or other activities. Some of these teachers also informally teach in people's homes and community spaces too.

The temporary and roaming nature of this role means that they move about the country, having unsupervised access to children in the Gurdwara and in homes. This does not therefore come under the current definition of regulated activity.

## ► Caretakers for places of worship and community centres

**Caretakers are often working in faith venues unsupervised, and at times where children's groups, youth groups or supplementary schools may be meeting.**

This means that they have access to children and young people without being officially in regulated activity. This is a role that has a perceived level of trust and so this increases the risk.

An example of this taking place in practice in a formal and regulated setting (education) is Ian Huntley who gained access to children and established a relationship of trust with them. This role would not be considered regulated activity under the current definition.

## ► Residentials, holiday camps and event roles

**There are many roles at residentials, camps and events that are required for its running but would not be considered in regulated activity.**

These include setting up, cleaning and maintenance, cooking and hospitality roles and AV/sound teams. Many of these individuals will interact with children and have access to them, however currently they would not be classed as being in regulated activity and may not be eligible for an enhanced check.

## ► Kitchen/Seva volunteers

**Seva is a central concept across Sikhism, Hinduism and Buddhism meaning "to serve".**

Volunteers are cooking and serving food and will interact with children during communal meals, festivals or at residential camps.

Under the current definition of regulated activity, these volunteers would not be eligible for an enhanced check, even though there are risks relating to the potential of unsupervised access to children.

## ► Itinerant preachers - visiting religious figures or speakers

**An itinerant preacher or minister is a religious figure or speaker who travels to different religious settings whilst preaching, often in a relatively short period of time.**

These individuals, although not in direct roles with children, will meet children, young people and adults at risk due to the nature of their work (which involves visiting lots of settings in a short period of time).

As visiting religious figures or speakers are often given a platform to speak, they are perceived by congregations (including children and young people) as safe. However, safer recruitment checks are rarely done as itinerant preachers are often not UK based, are not overseen by a specific organisation and checks are not done by the organisations they are visiting.

## ► Faith leaders

**Religious educators or leaders across faith communities meet children on a regular basis. They will often be involved in teaching children or adults at risk through preaching and teaching and due to their position, they will be perceived as safe.**

Under the current definition of regulated activity, this offers a loophole where religious educators or leaders are often in regulated activity with children, young people and/or adults at risk without realising (and therefore the relevant checks have not been done) or if they are not in regulated activity (due to frequency of their teaching). They are perceived as safe by the congregation regardless due to the authority of their position in the faith community.

*In Scotland, leaders of faith communities are automatically defined as being in regulated activity.*

## ► Granthi (Sikhism)

**A Granthi is the ceremonial reader who performs continuous reading of scripture (Akhand Paath).**

The individual is often present at long religious ceremonies involving families and children and perform private prayers in people's homes where children may be present. Although not in direct roles with children, they will meet children, young people and their families on a regular basis due to the nature of their work. There is also a risk that the Gurdwara will perceive the Granthi as safe due to their platform and role.

### Conclusion

**These examples from faith communities show that current loopholes in the definition of regulated activity are leaving children and young people at risk.**

Roles that would be perceived by the public as safe and having had relevant safer recruitment processes applied do not currently qualify, leading to misplaced trust.

In other cases, people may be working in roles that do qualify as regulated activity, but a lack of understanding and awareness means that they are working without the relevant level of check being completed.

Clarifying and expanding the definition of regulated activity would ensure comprehensive safeguarding across all contexts, including faith-based settings, and help educate these groups about their responsibilities, leading to better protection for children and vulnerable individuals.

**Any queries or for further information about this briefing email Katy Jackson on [katy.jackson@thirtyoneeight.org](mailto:katy.jackson@thirtyoneeight.org) or go to [@Thirtyoneeight](https://thirtyoneeight.org/manifesto)**

This briefing paper has been produced by Thirtyone:eight with contributions from St. Philip's Centre, NWG Network and Sikh Women's Aid.

**[thirtyoneeight.org](https://thirtyoneeight.org)**



Creating safer places. Together.

**[stphilipscentre.co.uk](https://stphilipscentre.co.uk)**



**[nwgnetwork.org](https://nwgnetwork.org)**



**[sikhwomensaid.org.uk](https://sikhwomensaid.org.uk)**

