



PVG CHANGES 2026

This update outlines the changes to PVG Legislation for 2026 and a reminder of the changes from last year. This involves:

1. A change to a 5-year PVG Scheme Membership rather than Lifetime.
2. Change from 3-year renewal through to 5-year self-renewal.
3. Regulated Roles – change to who requires a PVG check.

The Protecting Vulnerable Groups (PVG) scheme is managed by Disclosure Scotland. It helps ensure people who are unsuitable to work with children and protected adults cannot do regulated roles with these groups.

Each affiliated SACU club should have in place a Child Welfare and Protection Officer (CWPO) who has an approved PVG under the new system which came into force in April 2025.

Each individual working in a regulated role with young people (eg: coach, CWPO or Club Committee member) must also have completed a PVG application and had this approved by Disclosure Scotland.

Completed PVG applications are now valid for 5 years and are free for volunteers, whether coaches or committee members.

The SACU requires that the CWPO for a club should also complete relevant First Aid and every 3 years complete Modules 1 and 2 of a relevant CWPO course.

There are over 90 CWPS workshops openly available to book for sports clubs in Scotland.

For a list of upcoming CWPS courses go to:

[Child Wellbeing and Protection in Sport Course listings:](https://sportscotland.org.uk/training/child-wellbeing-and-protection-in-sport-course-listings)

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The CWPO of the SACU is Neil Park who may be contacted at neil.park@sacu.co.uk should you have any questions about the following information.

How the PVG Scheme Works

It is a legal requirement to join the PVG scheme if you're going to do a regulated role.

When you apply to the scheme Disclosure Scotland carries out criminal record checks. You'll get a disclosure which shows the results of these checks.

You can share this disclosure with the organisation you're applying with. They can use this information as part of their safer recruitment process to help decide if you're right for the role you're applying for. The below information is suitable for PVG checks to work with Children. For any information on 'Protected Adults' please see the end paragraph.

PVG Changes in 2026

Disclosure Act Update – Five-year PVG scheme membership

From 1 April 2026, if you apply to join the Protecting Vulnerable Groups (PVG) scheme, your scheme membership will last for five years from the date you join. If you are an existing scheme member and you make a PVG scheme application, your membership will automatically move to a five-year membership, ending your lifetime membership.

In phases, current PVG scheme members will be moved by Disclosure Scotland from lifetime to five-year membership.

No action is required from applicants for moving to the five-year membership, Disclosure Scotland will notify Individuals directly. Existing PVG scheme members who do not make a PVG application after 1 April 2026 will not be immediately moved to the five-year scheme.

Why is this important?

Previously (Up to April 2026)

If a PVG Scheme Member, you had lifetime membership until you removed yourself from the Scheme. The SACU asked for 3-year renewals as best practice to ensure personal information was up to date

Moving Forward

- Scheme Membership will last 5 years rather than for a lifetime
- If you continue to carry out a regulated role and the 5-year renewal is missed, you will no longer be a PVG Scheme Member, which means that ongoing monitoring of the individual by Disclosure Scotland will no longer happen and that you and your club or organisation would be committing an offence
- Your club or organisation would be deploying an individual not suitable for working with children

Reminder of PVG Changes (Introduced within the new legislation in 2025)

'Regulated work' is now a 'Regulated Role'

A regulated role in the sport sector is where an individual is carrying out a role for a sports club or organisation and means they are carrying out an 'activity' and have 'contact' with children as a necessary part of their role.

The role must also be undertaken in Scotland or, if it takes place outside of the U.K. the individual must be ordinarily resident in the UK and the role is being undertaken for an organisation or personnel supplier with a place of business in Scotland.

A regulated role can be paid work, unpaid work or work under a contract for services.

For further guidance on regulated roles see: <https://www.mygov.scot/disclosure-guidance-sport>

As well as carrying out an activity, contact with children or protected adults must be more than incidental and includes at least one of the following:

- a) physical contact with children or protected adults
- b) visual, written or verbal communication with children or protected adults
- c) exercising power or influence over children or protected adults

Exercising power and influence means any of the following:

- a) assisting, facilitating, permitting or impeding progress towards a desirable objective or outcome for a particular child
- b) making decisions of an operational or strategic nature that could have an impact on a number of children
- c) persuading or putting pressure on a particular child to behave or act in a certain manner for the financial gain or personal gratification of a person other than the child

The activity or contact must be a necessary part of the role.

Generally, an activity, or contact, is likely to be a "necessary part of the role" if:

It is something the individual will be asked or reasonably expected to do as part of their role.

- For example, it's part of their role description or, in the absence of a role description, that they anticipate it as being part of their role.

Their role includes being a designated stand-in or substitute for someone carrying out a regulated role.

- For example, if an organisation has a pool of individuals who could be asked at any time to stand in or cover for a position that includes carrying out a regulated role, then all of the individuals in the pool should be assessed as have the activity and contact as a necessary part of their role.

An activity, or contact, is not likely to be a “necessary part of the role” if:

- It is carried out by an individual who is, for example, carrying this out due to an emergency or very short notice situation due to unexpected absence or a need from the recruiting organisation to obtain additional cover
- The activity is not an expected part of the role that the individual would usually carry out.

The activity or contact must not be incidental. In considering whether contact is incidental, you should consider who the service is intended for, whether that be the general population or, more specifically, for children.

An activity is likely to involve incidental contact when it is:

- Part of a service that is intended to be open to all.
- Attractive to a wide cross section of society.
- Not an activity involving contact with children as a necessary part of the individual’s role, but children are in the general vicinity when the individual is carrying out their role.

Conversely, contact is likely to be considered more than incidental when an activity:

- Is part of a service intended to be for children.
- Is positioned or presented to be more likely to particularly appeal to children than others.

There’s no rule about how often or how long a role requires an activity carried out for it to be a necessary part of the role. An activity done every day can be necessary to an individual’s role, but so can an activity only done once or twice a year or even for one day.

Roles determined by the SACU and as agreed with Disclosure Scotland that will require a check:

- Safeguarding Officer (CWPO)
- Coach / Trainer

Committee/Board Member

Holding a position of responsibility in a club or organisation which has as one of its main purposes the provision of benefits for or to children.

It is intended to include, for example, individuals acting as committee or board members for organisations whose main purpose is to benefit children.

It is not the intention that every member of a committee governing a sports organisation will be in a regulated role.

Please see below case studies for examples of this.

Case Study 1: A committee member for an organisation that does not have a main purpose of benefits to either children or protected adults.

Ewan is the Chair of a sports club committee. The club runs activities that are open to the community, but not specifically aimed at children or protected adults. The committee has carefully considered and determined that, while the club does provide a benefit to children and protected adults who participate, these are not one of its main purposes.

The sports club committee have made this decision based on a number of different factors such as SGB guidance, their club constitution, its set up and governance and the participant demographics.

While Ewan is in a position of responsibility and is involved in making decisions about the running of the club, he is not carrying out a regulated role because the club does not have benefits to either children or protected adults as one of its main purposes.

Case study 2: Sports organisations contributing views for others to make a strategic decision.

A sports club sub-committee is developing their junior programme and meets with club members to seek their views. Club members attend a meeting and provide the sub-committee with feedback on the events programme and training camps. The final decisions on these are then taken by the sub-committee.

As the sports club members are contributing views, rather than making an operational or strategic decision, they are not carrying out a regulated role. The sub-committee members are carrying out a regulated role as they are in a position of responsibility and are exercising power and influence through making decisions of an operational or strategic nature.

Case study 3: Committee member in a position of responsibility.

Joyce is a committee member of a sports club. The club includes members who are under 18 years of age. One of the main purposes of the club is to provide benefits to children and protected adults.

Joyce is not involved in the day to day running of the club, but instead makes decisions about club policies and operational processes. Joyce is carrying out a regulated role as they are in a position of responsibility. They are exercising power and influence because they are making decisions of an operational and strategic nature.

Protected Adults

Definition of a Protected Adult:

A protected adult is anyone 18 or over who, by reason of physical or mental disability, illness, infirmity or ageing and either:

- (i) has an impaired ability to protect themselves from physical or psychological harm. or
- (ii) requires assistance with the activities of daily living

A protected adult can also be anyone 18 or over who is receiving a health service from a medical practitioner, such as a doctor or nurse.

A protected adult can also be anyone 18 or over who is:

- Homeless, as is defined by section 24 of the Housing (Scotland) 1987, or has experienced, is experiencing or is at risk of domestic abuse, and;
- Is receiving counselling, therapy, advice, guidance or advocacy support in relation to health or wellbeing

If there is a member of your club who would be considered a 'Protected Adult' this does not mean anyone who comes into contact with them requires a PVG check to work with 'Protected Adults'. You must keep in mind all of the previous information regarding what a regulated role is with children and apply that to protected adults

If you were planning coaching sessions specifically to work with a 'protected adult' or group of "protected adults" then a PVG check to work with "Protected Adults" is required.

sportscotland has developed an Adult Wellbeing Protection in Sport (AWPS) course and again, if you are interested in this, please see the **sportscotland** web site for further details:

<https://sportscotland.org.uk/training/child-wellbeing-and-protection-in-sport-course-listings>