

CLAS CIRCULAR

2026/14 (06 August)

Disclaimer

CLAS is not qualified to advise on the legal and technical problems of members and does not undertake to do so. Though we take every care to provide a service of high quality, neither CLAS, the Secretary nor the Governors undertakes any liability for any error or omission in the information supplied.

It would be very helpful if members could let us know of anything that appears to indicate developments of policy or practice on the part of Government or other matters of general concern that should be pursued.

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CHARITIES AND CHARITY LAW

Charity Commission: EHRC Code of Practice

For information and **possibly for action**

The Charity Commission has issued a reminder that the EHRC's guidance, [*Equality Act 2010: Code of Practice for services, public functions and associations, 2026*](#), comes into force today, 5 August. The Commission advises charities to take steps to ensure that they comply with the Code and the law, notably the changes regarding the definition of sex under the Equality Act 2010 as relating to biological sex: "Such steps might, depending on the nature of a charity's work, include seeking legal advice."

Meanwhile, the Charity Commission says that it is working "at pace" (as Government agencies always say nowadays, however fast or slow it may be) to update its Equality Act guidance for charities, which it aims to publish during the Autumn.

That guidance, when published, will provide further support for charities in understanding how the Equality Act and the Code affect them as charities. For example, it will set out how the charities' exception might apply, and how charities might take positive action under the Act. However, the guidance will not alter the legal principle set out by the April 2025 Supreme Court judgment in *For Women Scotland v Scottish Ministers* that for the purposes of the Equality Act "sex" means "biological sex".

[Source: Charity Commission, 21 July]

PROPERTY AND PLANNING

Terrorism (Protection of Premises) Act 2025: training

For information and possibly for action

Church of England and Community Security Trust: “A practical walk through the Terrorism (Protection of Premises) Act 2025”: The emphasis will be on Standard Duty premises. Coverage will include what must be done to comply with the Act, looking at which premises/events are in scope, and the requirements for Standard and Enhanced Duty premises, as well as Qualifying Events. The webinars will also look at the regulator’s responsibilities and enforcement. Finally, there will be discussion of practical examples and suggestions. Anyone interested in participating should click on one of the following links:

- [Tuesday 8 September, 10 am](#)
- [Thursday 1 October, 12:30 pm.](#)

Home Office: In the autumn, the Home Office will host an in-person roadshow across the UK for anyone overseeing premises or events that fall within the scope of the Act. You can register your interest here: <https://www.homeofficesurveys.homeoffice.gov.uk/s/PLMQ3J/>.

[Source: Historic Religious Buildings Alliance, 1 August]

The Places of Worship Renewal Fund (PWRF): Expressions of Interest

For information and possibly for action

In March 2026, DCMS announced a fund of £1.5 billion, including £92m for places of worship. It is being administered by Historic England and will deliver £92 million over 4 years (£23m spend per year).

On 20 May, Historic England launched the new Fund. All the information is [here](#).

Key features:

- Its purpose is to support capital works designed to keep places of worship open, active and safe.

- It covers urgent fabric repairs, whether or not a building is on the *Heritage at Risk Register*.
- Essential improvements, such as electrical upgrades, heating, facilities and step-free access, are included.
- Providing they are actively used for worship, listed places of worship of any faith or denomination in England are eligible, including listed buildings built for purposes other than worship.

The first deadline for an Expression of Interest (EOI) was 14 June 2026.

There are two rounds of applications each year, with the next Expression of Interest deadline being **27 September 2026**.

Members are encouraged to submit an EOI as early as possible to receive either an invitation for a full application or targeted feedback on their forms.

Historic England has also published the [Places of Worship Funding Index](#), which it describes as 'A resource to support places of worship in England to identify potential funders for building-focused projects'.

[Source: HRBA, 1 August]

SCOTLAND

Ecclesiastical Exemption survey

For information and **possibly for action**

[Built Environment Forum Scotland](#) provides secretariat support for the [Scottish Places of Worship Forum](#) (not to be confused with the English one, which meets under the auspices of Historic England).

It is currently conducting a [survey on Ecclesiastical Exemption in Scotland](#) under the terms of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. The survey arises from discussions at the Places of Worship: Planning Forward conference in October 2025, at which participants raised the changed context for places of worship since Ecclesiastical Exemption was put in place.

The survey closes on [1 September](#).

[Source: Built Environment Forum Scotland, August 2026]

CLAS EVENTS

CLAS aims to hold meetings throughout the year on issues that are important and of concern to members. We currently have three meetings planned, please find further information below and if you would like to attend, please email info@churcheslegislation.org.uk.

The Places of Worship Renewal Fund [PWRF] and devolved administrations:

CLAS is holding an *online* meeting on **Wednesday 19 August from 14:00 to 15:00** on possible alternatives in devolved administrations to the new Places of Worship Renewal Fund [PWRF]. We will discuss ways in which CLAS can support a coordinated approach to ensure comparable treatment to the PWRF throughout the UK, including helping to identify other avenues for funding.

Please let us know if you are planning to attend by emailing info@churcheslegislation.org.uk. We hope that many of you will be able to join for a fruitful discussion.

Microsoft Teams meeting link:

Join: <https://teams.microsoft.com/meet/337279248965452?p=FO0aA8MGkZmluL1UDz>.

Meeting ID: 337 279 248 965 452: Passcode: QJ3fq9Tv

AI-Generated Complaints:

Churches are dealing with an increase in AI-generated complaints. The Charity Commission's current guidance is outdated because of the speed at which AI is moving. There is also evidence that complaints are becoming a legal issue, whereas previously, complaints were dealt with without recourse to law. We understand the frustration and concern that this is causing for members and thought an online meeting might be helpful for members to gain a better understanding of how best to prepare for this issue.

Jeremy Isaacson, a Partner at *Farrer & Co*, has kindly agreed to speak to us about how churches can best prepare for this new threat. Jeremy is a specialist in data protection and freedom of information law, and he regularly advises public authorities on request handling and dealing with complaints to the Information Commissioner's Office.

The meeting will be held online on **Thursday 10 September at 13:30**. Please let us know if you can join us and whether there are any specific points or types of complaints you would like Jeremy to address. To join the meeting on the day, please follow this link: <https://us06web.zoom.us/j/82757997549?pwd=lqfrAv7mUpfd8UpVCWiBXOxVuA7TaE.1>.

Meeting ID: 827 5799 7549: Passcode: 214109

Future meetings:

CLAS is also holding an **in-person meeting** on 22 October 2026 on the EHRC Draft Code of Practice. Further details will be published shortly. If you have any concerns or issues, please email us: info@churcheslegislation.org.uk.