



Consultation Response

Disclosure (Scotland) Act 2020 -
accredited body fees and proposals for
discounting: PVG scheme consultation

May 2024



About Us

Volunteer Scotland is Scotland's national centre for volunteering. We believe that volunteering should be an enjoyable, rewarding and fulfilling experience for the volunteer; that volunteers have the right to be safe and protected in delivering their volunteering roles; and that to derive health and well-being benefits from volunteering requires regular and meaningful contributions of time.

This response was developed following extensive consultation with members of the [Volunteering Action Plan Policy Champions Network](#) (PCN). We surveyed the 78 PCN members on this issue with a 36% response rate and hosted a consultation event attended by 6 PCN members. We have also received direct emails on this subject from several other key stakeholders and these have been reflected in our response.

Should any queries arise from our response, please contact our Policy Officer by emailing sarah.latto@volunteerscotland.org.uk

Consultation Response

Introduction

As Scotland's national centre for volunteering, we are strongly opposed to the proposal to replace the fee waiver for volunteers in Qualifying Voluntary Organisations (QVOs) with a fee reduction. Our response provides clear evidence to suggest that this proposal could have a devastating impact on volunteers, volunteer involving organisations, and on the provision of services for some of the most vulnerable groups in Scotland. This proposal also undermines several key government priorities, not least the implementation of the Volunteering Action Plan. As stated by one of our stakeholders, to move forward with this proposal would be 'unfathomable'.

We also have evidence to suggest that the proposals to introduce fee discounts for care experienced young people and those in receipt of certain benefits could inadvertently introduce a barrier to those groups participating in volunteering, particularly in organisations that would not qualify for the fee waiver or fee reduction. As such, we believe that further consultation with these groups is urgently required.

In our response, we use evidence and insight from the [Volunteering Action Plan Policy Champions Network](#), along with other key stakeholders, to highlight some of these challenges and provide several recommendations.

Questions

Question 1 – Do you agree with the proposal to create a fee discount structure for people in receipt of certain benefits?

[don't know]

Question 2 – What information do you think we need to consider when looking at a fee discount for people in receipt of certain benefits?

Our comments regarding the potential implications of the proposed fee discount for people in receipt of benefits relate specifically to those in regulated voluntary roles who are not eligible for the fee waiver, or the proposed fee discount, for volunteers. Many organisations that engage volunteers in regulated work are not a 'Qualifying

Voluntary Organisation' (QVO). Most non-QVOs are organisations in the public sector, including schools, hospitals and many care homes.

Whilst the exact split between volunteers undertaking regulated work in QVOs and non-QVOs is not immediately clear, [evidence](#) suggests that public sector volunteering is a growing trend in Scotland, with 23% of Scottish volunteers participating in the public sector in 2023 compared to 14% in 2019. This suggests that a significant minority of volunteers in regulated roles are likely to be ineligible for the current fee waiver or proposed fee discount.

This might suggest that the proposed fee discount for people in receipt of certain benefits would be a positive step for supporting their wider participation in volunteering for non-QVOs. However, the benefits for this group, particularly from a volunteering perspective, are less clear-cut. It is our understanding that most organisations involving volunteers in regulated work – both QVOs and non-QVOs - cover any costs for PVG membership. As such, this proposed fee discount would most likely benefit the organisation that an individual in receipt of qualifying benefits volunteers for, rather than the individual themselves.

This could have some positive impacts on the volunteering participation rate of people in receipt of qualifying benefits. Non-QVOs might be more inclined to recruit volunteers who are in receipt of certain benefits because of the fee discount. People with disabilities, who are more likely to require some form of disability benefit, are [less likely to volunteer](#). However, there is also [research](#) to suggest that people with disabilities actually contribute more hours than those without disabilities when they do volunteer, and are [more likely to experience benefits](#) to their health and wellbeing from volunteering.

Despite this, over half of respondents to our survey of Policy Champions Network (PCN) members regarding this consultation felt that this proposal would have a negative impact on their ability to engage people in receipt of qualifying benefits as volunteers. In particular, respondents expressed concern at asking volunteers to disclose the sensitive personal information required to ascertain eligibility for the fee discount. This was further reflected in our consultation event, where one attendee stated:

“the difficulty is you're putting the responsibility on to people to disclose that they are care experienced or receiving benefits. If it's us bringing people on board, to me you're breaking that connection, that relationship from the start because it's so invasive to ask those questions and also people might not want to be honest and say yes, I'm getting benefits”

This is a particular concern where people are volunteering within their local community. Many volunteers might not feel comfortable disclosing this type of

information if the person recruiting them also lives in their community. Given that community-focused volunteering [increased by 5% in 2022](#), this is a distinct possibility.

This speaks to wider concerns about the stigma, both actual and perceived, regarding poverty. [Recent research](#) from the University of the West of Scotland highlighted both the perceived and received poverty stigma of low income adults from institutions and communities. Experiences and expectations of poverty stigma, as highlighted in this research, could make those on low incomes reluctant to disclose income or benefits information to organisation.

Other PCN members suggested that the need to prove eligibility could create an additional bureaucratic burden for volunteers and organisations, which could delay volunteering. One respondent to the survey stated that:

“It will require organisations to ask people if they qualify and for any required evidence for qualifying for the reduction: creating an additional admin burden for both org and volunteer.”

In the recent [Scottish Analysis of the Time Well Spent research](#), it was found that 19% of Scottish volunteers felt that ‘there is/was too much bureaucracy’ in how their volunteering is managed. Additionally, 17% of non-volunteers in Scotland currently do not volunteer because they are put off by the associated bureaucracy and administrative processes. As such, to improve volunteer experiences, it is vital that we make volunteering less bureaucratic.

Finally, there was concern from attendees of our consultation event that people in receipt of benefits had not been adequately consulted on these proposals. **As a result of this, and the concerns raised by the PCN, we would recommend further consultation with people in receipt of benefits, including those in voluntary roles, to better understand if the benefits of such a move would outweigh the apparent challenges.**

Question 3 – Do you agree with the Option 1 proposal to provide a fee discount for care experienced young people?

[don't know]

Question 4 – Do you agree with the Option 2 proposal to provide a fee discount for care experienced young people?

[don't know]

Question 5 – What information do you think we need to consider when proposing a fee discount for care experienced young people?

Our answer to this question is broadly similar to our answer to question 2, and our comments relate specifically to care experienced young people in regulated voluntary roles in non-QVOs who are not eligible for the fee waiver, or the proposed fee discount, for volunteers.

We again recognise that this proposal could increase the likelihood of non-QVOs recruiting care experienced young people as volunteers to benefit from the fee discount. However, we have heard concerns from the Policy Champions Network that this proposal could unintentionally create a barrier to volunteering.

Members of the PCN were concerned at the onus being placed on care experienced young people to prove their eligibility for the fee discount. Yvonne Atkins, Volunteer Manager from Who Cares? Scotland, is a member of the PCN and attended our consultation event. Yvonne expressed concern that this proposal will be a major barrier for care experienced young people, particularly because of the need to provide evidence to demonstrate eligibility for the discount. She stated that:

“we know from our members that there are so many who will not disclose that they are care experienced, therefore putting in a discount completely defeats the purpose because they're not going to say they are care experienced. We know that gathering evidence, for benefits and for care experience, is so difficult... especially for people who are or were in kinship care or looked after at home, that evidence is practically not there.”

Similarly, other attendees of the PCN consultation event expressed their concern that the groups most likely to be impacted by this proposal, particularly care experienced young people, had not been adequately consulted, with one stating:

“It's a shame they didn't listen to organisations and individuals themselves who are care experienced, people in organisations addressing poverty as well, because again it's not the route to do it and it will have the opposite effect.”

With this in mind, we would again recommend further consultation with care experienced young people, including those in voluntary roles, to better understand if the benefits of such a move would outweigh the apparent challenges.

Question 6 – Do you agree with the proposal to move to a fee discount structure for volunteers in QVOs?

[no]

Question 7 – What information do you think we need to consider when proposing moving to a fee discount for volunteers in QVOs?

We have consulted widely with volunteer involving organisations and infrastructure bodies across Scotland on the potential impact of this proposal through both a survey and a consultation event. It is clear from the feedback we have received that, if taken forward, the removal of the fee waiver for volunteers in Qualifying Voluntary Organisations could be considerably damaging for voluntary organisations, volunteers, and vulnerable people across Scotland.

Firstly, the potential implications of this proposal for voluntary organisations are significant. In the Policy Champions Network survey, 79% of respondents felt that the proposal would have a negative impact on their organisation or the organisations they represent. This is largely because the vast majority of volunteer involving organisations take steps to ensure that volunteers are not out of pocket because of their volunteering. This is in alignment with the [Volunteer Charter](#), which sets out 10 principles for sustainable and legitimate volunteering including that ‘no one should be prevented from volunteering due to their income’.

65% of respondents to the PCN survey stated that they would absorb the new discounted PVG fees for volunteers. None said that they would ask volunteers to absorb the cost, but 24% said that they ‘didn’t know’. As a result, this proposal could have significant financial implications for many organisations. We estimate that the total potential cost of this proposal for qualifying voluntary organisations is just under £1 million.¹

This additional cost comes at a time when many voluntary organisations are struggling financially. The most recent [SCVO Third Sector Tracker report](#) from Winter 2023 found that 95% of organisations reported taking actions to mitigate financial challenges that they had experienced since Spring 2023. Only 5% of respondents say that their organisations have faced no financial challenges in the last four months. This situation has fuelled repeated calls from SCVO for Fair Funding arrangements for the voluntary sector. Indeed, one PCN survey respondent

¹ This estimated figure of £967,356 was calculated by Volunteer Scotland using data from the [Disclosure Scotland annual report 22/23](#) and the proposed new PVG fees detailed in the consultation paper.

suggested that the ‘lack of significant movement in Fair Funding on the scale needed’ is further reason not to proceed with this proposal.

The potential cost of this proposal to voluntary organisations is further exacerbated by the inherent difference between volunteers and paid staff. PVG fees do not account for the number of hours an individual is undertaking regulated work. According to [Volunteer Scotland analysis in 2018](#), volunteers in formal roles contribute, on average, 2.4 hours per week. As such approximately 14 volunteers contributing 2.4 hours per week would be required to equate to one full time 35 hour a week paid employee. This means that, even with the proposed discount, the cost for PVG membership fees would be considerably higher when recruiting volunteers compared to paid staff.

In our survey of PCN members, one respondent referred to this proposal as a ‘tax on volunteering’, whilst another stated that:

“As a third sector organisation already in a non-secure financial situation and an increase in referrals of clients requiring volunteer befrienders the cost of having to purchase volunteer PVGs will be huge and is quite worrying to think of other organisations in similar positions.”

For those organisations not able to meet the full cost of proposed PVG fees for their volunteers in regulated roles, it could lead to cuts in volunteer-led services for children and protected adults. One respondent to our survey stated that:

“Given that we already rely heavily on funding from all avenues of support this is a fee that will further reduce opportunities that are supported within the local community by volunteers.”

Whilst another stated that:

“We would plan to increase our engagement with schools and youth groups across Scotland to raise ocean literacy, helping young people to understand the issues associated with climate change and marine conservation. This would require volunteers having a PVG. It would be inappropriate and a barrier to volunteering to ask the volunteer to pay a PVG fee and yet it would also not be an afforded option for the charity. If a fee for PVG was required, it could likely prevent or hinder this work from progressing.”

And this leads on to the many potential disadvantages of this proposal for volunteers. In the PCN survey, 86% of respondents felt that the impact of this proposal on volunteers would be negative. And this comes at a time when volunteer participation in Scotland is in a period of decline. In the most recent [Scottish Household Survey results](#), it was found that formal volunteering (i.e. through an

organisation or group) had declined four percentage points from 26% in 2019 to 22% in 2022.

Firstly, the potential cut to volunteering services because of proposed PVG costs for volunteers would lead to fewer opportunities for potential volunteers. One respondent to the PCN survey stated that:

“Organisations are already struggling to survive and this would add an extra financial burden and potentially limit the opportunities on offer for volunteers.”

One attendee of the PCN consultation event also highlighted that this proposal could change the type of volunteering roles organisations recruit to, making volunteering less flexible and inclusive. She stated that:

“I can just see that if you're having to make choices, you're going to make the choice of paying for the PVG for the person who can give a year as opposed to the person who can give six weeks, which again will then just narrow down the people getting the experience”

Much of the recent evidence on volunteer needs and preferences has suggested that many volunteers would prefer more flexibility in their volunteering roles to ensure that it fits in with other commitments. In the most recent [Time Well Spent survey](#), 51% of prospective volunteers in Scotland stated that they would 'like to dip in and out of volunteering activities' and 48% stated that they would 'like to be able to carry out volunteering at a time and/or place of their choosing'. Similarly, 30% of non-volunteers in Scotland stated that they are not volunteering because they 'don't want to make an ongoing commitment'.

One respondent to the PCN survey stated that:

“It goes against the message that I have been trying to get across about volunteering - that it isn't something you need to commit to for a long term, it is easy to get involved/people don't need to know everything about your background. Even if it doesn't actually make it harder to volunteer, the perception that it does is enough to put people off as is word of mouth.”

This suggests that applying a cost to recruiting volunteers in roles with vulnerable groups would significantly affect the ability of many organisations to offer the level of flexibility that many people need.

There is a risk that those organisations who cannot afford to absorb the cost of PVG membership fees will have to pass the cost on to volunteers. This would be a significant challenge for many volunteers, particularly those on low incomes. In the PCN survey, one respondent stated that:

‘Some organisations may have to pass on the cost to volunteers-would have a significant negative impact, especially for the most disadvantaged volunteers and communities. Would make it more difficult to volunteer and many people would consequently miss out on all the many positive benefits volunteering brings. Would increase inequality, especially with the ongoing cost of living crisis.’

Whilst another stated that:

‘If the fee fell on the volunteer I think it would lead to a decrease of people wanting to volunteer as people are already stressed about money and we are getting less and less people volunteering.’

Epilepsy Connections, in their response to this consultation, stated that:

‘We spoke with a number of our own volunteers about this proposed change and they were surprised and disappointed by the suggestion. Many confirmed to us that they would likely reconsider their position as volunteers if they had to pay a fee. They also agreed that organisations absorbing the costs of any changes was unacceptable.’

This proposal would likely increase the barriers to volunteering for people on lower incomes - including many people in receipt of benefits or who have disabilities - and our evidence tells us that these demographic groups have the most to gain from volunteering. In our [2018 research](#) exploring the health and wellbeing benefits of volunteering it was found that: *‘there is clear-cut evidence that those subject to exclusion and disadvantage in society have the most to gain from volunteering in terms of their health and wellbeing.’* According to the [Scottish Household Survey 2022](#), people in more deprived communities and those with disabilities are already significantly less likely to volunteer formally than the average figure. It is vital that we do not put in place yet another barrier to participation in volunteering for those who are likely to benefit most.

This proposal also undermines the commitment to sustainable and inclusive volunteering which the Scottish Government committed to in the [2022 Volunteering Action Plan](#). In the Plan, then Cabinet Secretary for Social Justice, Housing and Local Government, Shona Robison, stated that:

“I share the aspiration that volunteering will continue to thrive and expand over the next decade and beyond.”

However, several people we have engaged with regarding this proposal believe that this proposal undermines the government’s commitment to the Volunteering Action Plan. One stated that:

“It would undo all the positive work around the Volunteering Action Plan, local and national priorities that the tremendous support of volunteers contributes so much to.”

Whilst the potential impact of this proposal on volunteers and voluntary organisations would undoubtedly be significant, the effect would undoubtedly be felt most keenly by children and protected adults across Scotland.

As previously stated, these proposals are likely to lead to reductions in volunteer-led services supporting children and protected adults. We know from the [Disclosure Scotland Annual Report in 2022/23](#) that 18% of PVG applications that year were for volunteers in QVOs. This equates to 54,720 applications for volunteers supporting services to children and protected adults in one year.² Such voluntary sector services are often community-based, community-led and respond to local need. They also often provide services that are early intervention in nature, greatly reducing the likelihood that vulnerable people would require statutory or crisis intervention. They facilitate the access of children and protected adults to opportunities for culture, support and community connection that would undoubtedly affect their quality of life if lost.

One organisation, Mearns Kirk Helping Hands, reached out to us to share their views on the proposals in this consultation. They stated that they have a team of 120 volunteers who help them to deliver 10 groups and activities, as well as a Befriending Service for older people. They state that:

“the potential changes to the PVG fees could mean that we are no longer able to recruit volunteers to the numbers we currently have, which, in turn would impact on the number of people we can support.”

There was also recognition in the PCN consultation event that the potential impact of these proposals on the provision of sports coaching for children and protected adults would be significant. One attendee, who volunteers in the provision of sport for people with disabilities, stated that this proposal would have a ‘massive impact’.

There has also been the suggestion from members of the Policy Champions Network that some organisations might take steps to bypass PVG checks for volunteers to sustain services. In our consultation event, one attendee suggested that the move from ‘regulated work’ to ‘regulated roles’ could be seen as a ‘loophole’ by some organisations if their particular voluntary roles are not listed. We would of course never condone such practices and will continue to reinforce the responsibility of organisations to safeguard vulnerable groups, but this is a clear risk.

² 18% of the total number of PVG applications completed which is reported as 304,000.

Some attendees at the PCN consultation event also highlighted that the groups this consultation is seeking to support would likely lose out as a result of the proposal related to fees for volunteers in QVOs. It is suggested in the consultation document that the savings gained from this proposal would help to support the introduction of measures to 'provide broader support to households on low incomes or who face additional barriers through a history of care experience'. However, these groups currently benefit significantly from both volunteer-led services and participation in volunteering. In the PCN consultation event, Yvonne from Who Cares? Scotland stated that:

"I understand that the money for that is then going to the income based support and the care experienced young people, but actually arguably the people who would benefit the most from volunteering are our care experienced young people and those who are on income based benefits and therefore you're putting a barrier to start volunteering."

In addition, care experienced young people and people in receipt of benefits receive support from a range of services provided by volunteers in QVOs. With this in mind, removing the fee waiver for volunteers to enable the provision of a fee discount to care experienced young people and those in receipt of certain benefits seems counter-productive.

Finally, it is important to acknowledge the potential implications of this proposal for several government priority areas. One respondent to the PCN survey stated that:

"It's even more frustrating that a government agency is making proposals that will harm progress of wider government commitments."

The government have historically been committed to community empowerment, community wealth building, education reform, and a focus on preventative services in health and social care. More recently, with the change in First Minister, there has also been a particular focus on eradicating child poverty. Volunteers in qualifying voluntary organisations have an important role to play in achieving all of these ambitions.

Volunteers often lead in the provision of services, often with limited or no paid staff, which promote community connection and empowerment. Volunteers in community or voluntary organisations support the provision of wider support and educational experiences for our children and young people, including through the uniformed groups and anti-poverty organisations. Volunteers also provide community-based care and respite services for protected adults, helping to ease the pressure on our statutory services. This proposal is likely to impact on the level of provision offered by voluntary organisations to support all of these priorities.

With all of this in mind, we sympathise with respondents of the PCN survey who stated that to move forward with this proposal would be ‘a false economy’, ‘a disgrace’, ‘unfathomable’ and ‘self-defeating’. Volunteering is an emotive subject, it delivers enormous impacts across all areas of society and is part of our national identity, the fabric of community life and sense of self. **We therefore urge the government in the strongest terms not to move forward with the proposal to replace the fee waiver for volunteers in QVOs with a fee discount and maintain the fee waiver as it is.**

Question 8 - Do you agree with the proposal to increase the accredited body registration fee to £120, with additional countersignatories continuing to be £15 per addition?

[no]

Question 9 – Do you agree with the proposal to introduce an account upgrade fee?

[Don't know]

Question 10 – What information do you think we need to consider in relation to the accredited body registration fee?

Many volunteer involving organisations utilise the lower levels of disclosure – basic, standard and enhanced – as part of their recruitment and safeguarding process. As such, many voluntary organisations will already have a lead signatory and countersignatories to support the processing of volunteer disclosure applications and will likely seek to become an accredited body.

Given the financial challenges facing many voluntary organisations at present, as detailed in our answer to question 7, we are opposed to the significant fee increase for accredited body registration. Whilst we appreciate that the proposed fee increase is slightly below the inflationary increase, we cannot support any move that will increase the financial burden on voluntary organisations, many of which have not received an equivalent inflationary increase to their government funding.

As such, we would recommend that the accredited body registration fee be held at its current rate, or that a fee discount or waiver be put in place for qualifying voluntary organisations.

Question 12 – What information do we need to consider for the Equality Impact Assessment?

As previously stated, the proposals detailed in this consultation are likely to have a major impact on efforts to improve equality of access to volunteering. The potential equalities impact is particularly acute for volunteers in Qualifying Voluntary Organisations, but also appears to be a potential issue for volunteers in non-QVOs who are in receipt of certain benefits or who are care experienced young people.

As stated in our answer to question 7, the proposal to replace the current fee waiver for volunteers in QVOs with a fee discount will likely lead to a decline in volunteering opportunities, particularly for smaller community groups who cannot afford to absorb the cost of PVG membership for volunteers, even at the discounted rate. For those organisations that decide to ask volunteers to cover the cost of new PVG fees, this will have a significant impact for volunteers on low incomes or who are in receipt of benefits.

The proposals to introduce fee discounts for care experienced young people and people in receipt of certain benefits should, in theory, make it easier for them to volunteer with non-QVOs. However, the evidence we have heard from Policy Champions Network members, detailed in our answers to questions 2 and 5, would suggest that such a move could create unintended barriers as a result of the need to provide evidence of eligibility.

Finally, as stated in our answer to question 7, The proposal to remove the fee waiver for volunteers in qualifying voluntary organisations could lead to a significant decrease in volunteer led services which support Scotland’s most vulnerable groups. One respondent to the PCN survey stated that:

“[the proposal to remove the fee waiver for volunteers in QVOs] would lead to a reduction in volunteers, services that volunteers are crucial for reducing or stopping and will increase inequality/reduce opportunities as it will affect the most disadvantaged people and communities the most.”

Such services have a vital role in promoting social connection for vulnerable groups, as well as facilitating their access to sport, culture and community events. They are also frequently community-based – further facilitating access – and provide early-intervention support, often helping to prevent vulnerable groups from requiring the help of statutory or acute services.

As a result of this, we would recommend further consultation with those protected groups most likely to be affected by these proposals, including people currently in volunteer roles, to fully understand the equalities impact.

Question 14 – What information do we need to consider for the Children’s Rights and Wellbeing Impact Assessment?

As stated in our answer to question 7, it is clear that children and young people would stand to lose out on the provision of a significant number of services if the proposal to replace the fee waiver for volunteers in QVOs with a fee discount takes place. At a time when many voluntary organisations are struggling financially, and when volunteer participation – particularly in the delivery of services to children and young people - has declined significantly, such a move would likely lead to a further reduction in services for children and young people.

There are also concerns that the proposal to introduce PVG fees, albeit with a reduction, for volunteers in QVOs could lead to an increase in organisations not seeking PVG membership for their volunteers. Whilst we would not condone this practice, evidence from our stakeholders would suggest that this is a risk. In particular, the move from ‘regulated work’ to ‘regulated roles’ has been suggested as a potential ‘loophole’ for organisations.

Given the Scottish Government’s recent commitment to eradicating child poverty, the proposal to introduce fees for volunteers working with children would be counter-productive.

As a result of this, we would recommend that the Children’s Rights and Wellbeing Impact Assessment explores the potential impact of the proposal to remove the fee waiver for volunteers on the provision of services for children and young people and on ambitions related to eradicating child poverty.

Summary of Recommendations

Having considered the consultation document, we make the following recommendations:

- not to move forward with the proposal to replace the fee waiver for volunteers in QVOs with a fee discount and maintain the fee waiver as it is.
- further consultation with people in receipt of benefits, including those in voluntary roles, to better understand if the benefits of such a move would outweigh the apparent challenges.
- further consultation with care experienced young people, including those in voluntary roles, to better understand if the benefits of the fee discount would outweigh the apparent challenges.

- that the accredited body registration fee be held at its current rate, or that a fee discount or waiver be put in place for qualifying voluntary organisations.
- further consultation with those protected groups most likely to be affected by these proposals, including people currently in volunteer roles, to fully understand the equalities impact.
- that the Children’s Rights and Wellbeing Impact Assessment explores the potential impact of the proposal to remove the fee waiver for volunteers on the provision of services for children and young people and on ambitions related to eradicating child poverty.

Annex: Policy Champions Network Survey written responses

A survey was circulated to all 78 Policy Champions Network members on the 6th March 2024 and was open for responses until the 1st May 2024. 28 members of the Policy Champions Network participated. Below are the qualitative responses from this survey.

Please provide further details to support your answer to the question ‘What impact do you believe the proposed change to Disclosure Scotland fees for volunteers will have on your organisation or the organisations you represent?’

At a time of economic and financial pressures, significant national action needed to increase volunteering across communities and a lack of significant movement on Fair Funding on a scale needed, removing the waiver is likely to harm any progress in increasing volunteering and increase costs for organisations (or individuals) who do maintain progress. It's even more frustrating that a government agency is making proposals that will harm progress of wider government commitments.

We would plan to increase our engagement with schools and youth groups across Scotland to raise ocean literacy, helping young people to understand the issues associated with climate change and marine conservation. This would require volunteers having a PVG. It would be inappropriate and a barrier to volunteering to ask the volunteer to pay a PVG fee and yet it would also not be an afforded option for the charity. If a fee for PVG was required, it could like prevent or hinder this work from progressing.

Given that we already rely heavily on funding from all avenues of support this is a fee that will further reduce opportunities that are supported within the local community by volunteers.

The proposal is of huge concern and will have a very significant negative effect both for us and other Volunteer Involving Organisations (we have already had lots of organisations contacting us concerned about the proposal). As well as the cost

<p>implications there is the additional bureaucracy if this goes ahead. It would lead to a reduction in volunteers, services that volunteers are crucial for reducing or stopping and will increase inequality/reduce opportunities as it will affect the most disadvantaged people and communities the most. Would undo all the positive work around the Volunteering Action Plan, local and national priorities that the tremendous support of volunteers contributes so much to.</p>
<p>Additional costs that have not been budgeted for, inconvenience to volunteers who would have to pay the immediate cost then claim back the expense for the organisation. Time involved in administering this change.</p>
<p>This could have a disastrous impact on an already struggling section of society based on finances and lack of funding.</p>
<p>This change could represent a barrier to people volunteering with us. The current challenging financial landscape we are working in could mean that we do not have the funds to cover this for volunteers impacting the amount of support we can receive. A disclosure check is mandatory for most of our roles that require volunteers.</p>
<p>Without the ability to have disclosure check fees waved this could lead to serious issues in volunteer recruitment. It is common knowledge of the struggles in the Third Sector when it comes to finance so why limit our ability to recruit??</p>
<p>Didn't realise we could get support with the fee. I already have a disclosure paid for by KSB. However, knowing that other volunteers could obtain disclosure certificates would enable us to do more work with children.</p>
<p>Organisations are already struggling to survive and this would add an extra financial burden and potentially limit the opportunities on offer for volunteers.</p>
<p>As a third sector organisation already in a non secure financial situation and an increase in referrals of clients requiring volunteer befrienders the cost of having to purchase volunteer PVGs will be huge and is quite worrying to think of other organisations in similar positions.</p>
<p>We would be able to absorb the fees as we have limited numbers of volunteers who are directly in roles for us, however for many of our member organisations this could place additional and difficult financial burden if they are to absorb costs or potentially deter people from volunteering if the volunteer needed to meet the costs</p>
<p>This should encourage organisations to involve more volunteers.</p>
<p>Third sector organisations are under considerable funding pressures and adding an additional cost at this time is likely to lead to drops in practice standards and/or reduction in volunteer engagement</p>
<ul style="list-style-type: none"> -Reduction in services offered -Services may be offered in a different - less safe? way -Change of plans needed, less people supported
<p>We are currently experiencing financial challenges, cost of living and rising costs directly on organisation, needing to pay staff the recent 10% rise in real living wage due to cost of living and inflation at time when our grants/contracts are being</p>

cut by 10% having stood still for many years and the fundraising landscape is very difficult. This is yet another cost to bear but we feel we simply cannot pass this onto volunteers at a time when cost of living and finance is a known barrier to volunteering and volunteering is declining! It may mean though that we have to consider how many volunteers and in what roles.

The financial burden this places on the organisation will make it harder to offer volunteer opportunities. It will also mean that we will have to consider the amount of time & the longevity of the commitment the volunteer can give to the organisation in making a recruitment decision because of the cost impact.

Vollies just won't pay and we can't afford to.

We are a membership organisation, so many members will be part of organisations impacted but we are unsure to what extent

They probably won't pay for a disclosure

Will reduce volunteering opportunities.

Volunteers are already providing their time for free, feels somewhat wrong to ask them to pay.

This will have to be found from already constrained budgets.

In some cases, QVOs will be using local or national government funding to pay the SG fees, just plain stupid.

It will incur a cost to Disclosure Scotland to administer the payments.

Please provide further details to support your answer to the question ' What impact do you believe the proposed change to Disclosure Scotland fees for volunteers will have on volunteers?'

There is a risk that costs may be passed to volunteers to fund their own disclosure/PVG where organisations are unable to support. It's also adding a barrier to volunteering overall.

We know that there is significant interest within our volunteer community to support us with work with young people. This would benefit their careers and their wellbeing. Paying a fee for a DBS would be an unacceptable barrier to volunteering for some people and prevent their participation but it would be challenging for the charity to budget for this cost.

A lot of the volunteers provide a service based around their commitment to shared knowledge and skills. I think they would be frustrated to know that there would be a fee paid by service providers for their services that doesn't go straight back in to the local community support chain.

Some organisations may have to pass on the cost to volunteers-would have a significant negative impact, especially for the most disadvantaged volunteers and communities. Would make it more difficult to volunteer and many people would consequently miss out on all the many positive benefits volunteering brings. Would increase inequality, especially with the ongoing cost of living crisis.

Volunteering will reduce based on finances, especially younger volunteers.

Could be a barrier to someone who wishes to volunteer.
Volunteers looking for CV enhancement and opportunities to gain experience in fields relevant to their career advancement could miss out. Yet again, people from economically disadvantaged backgrounds could effectively be barred for participating in areas they have more to offer than people who have no lived experience of financial uncertainty.
It will mean less volunteers are able to obtain disclosure certificates especially if they work for small charities and organisations without much funding. Ultimately it places children and young people at more risk
See answer to 3
If the fee fell on the volunteer I think it would lead to a decrease of people wanting to volunteer as people are already stressed about money and we are getting less and less people volunteering.
If volunteers need to meet the costs themselves this will increase barriers to people volunteering and will probably affect most those who would have most to benefit from volunteering
Encourage people to volunteer.
Volunteers may feel obliged to support the organisation by meeting the cost - but for many this will not be possible and they feel unable to offer their skills.
may not be keen to volunteer, could be another barrier. This is challenging especially as volunteering is difficult now
-Detrimental to what we are trying to promote in volunteering (easy to access/don't need to sign up for long time (might affect students/young people (consciously or unconsciously) by recruiting those more likely to stay longer in the role. May lead to people not being truthful about the time they can give. -reduction in the number of volunteering ops
They may be asked to pay the fee
If volunteers are aware of this it will potentially stop them even considering volunteering and therefore not approaching VIO's to even ask about roles. Some volunteers will feel awkward that charity money is being used to pay for something that it can ill afford at this time.
Less opportunities for volunteering. See above.
Again, its unknown territory. There could be a case that volunteers do not volunteer as they cannot get fees paid, it could put volunteers at risk by some organisations opting to not do a disclosure.
Anything that makes it hard for volunteers is an excuse for them not to bother
Many will be unable to afford to volunteer.
It will place a financial burden on people to volunteer - just plain wrong. It will represent a barrier to volunteering for groups already underrepresented in volunteering, thereby going against the SG's own commitment to make volunteering more inclusive. It will incur a cost to Disclosure Scotland to administer the payments.

Please provide further details to support your answer to the question ‘What impact do you believe the proposal to introduce fee reductions for people in receipt of certain benefits and care experienced young people will have on your ability, or the ability of organisations you represent, to engage volunteers from those groups?’

Removing any barriers to volunteering is hugely important. Removal of the fee is a better position, however a reduction would be somewhat welcome. That said, we also need to remove any needs for people to unnecessarily disclose a status or personal circumstances where it doesn't relate. There isn't a direct correlation to poverty, inequalities and care experience to likely outcomes or assurances from Disclosure, therefore I can see the practical benefits to not paying a full fee, however unintended consequences are a barrier to having to disclose more personal info than is really needed.

Having a means tested approach will complicate admin processes and still create barriers to volunteering with volunteers potentially needing to declare sensitive information about their situation.

As per answer to question 5. If this is to go ahead the process of application needs to be more streamlined allowing for a much quicker turnaround

Would make it more difficult to volunteer and many people would consequently miss out on all the many positive benefits volunteering brings. Would increase inequality, especially with the ongoing cost of living crisis.

These should be covered by organisations not individuals especially in these circumstances

People can be in work and still have zero disposable income. Volunteering should aid people to find work or increase their skillset to find better paying work

I'm not sure there is any evidence to say that these groups will suddenly start volunteering. There was no obstacle before as organisations could apply for disclosures on their behalf.

Any fees will impact and means testing is a time consuming and ineffective barrier for many of those already on benefits.

I still think having any fee will be off-putting for people wanting to volunteer.

This will depend on whether organisations themselves or volunteers will be meeting the costs

encourage more volunteers to organisations

I don't feel that I need to know this information at all, and don't want to attract people by this criteria.

It would mean that we would be required to ask new volunteers before they have even started some very personal questions, that they may feel uncomfortable

asking if we were to be offering to pay for their disclosures and this could put them off. If we aren't offering to pay the simple cost of them being faced with these fees at application stage could put them off.

It's not a reduction if it was free to start with. It's reduction on an increase, which is still an increase in real-terms. It will cost more for volunteers and third sector organisations.

For organisations that pass on the Disclosure cost to volunteers, it will mean that anyone on a low income will have to weigh the costs of volunteering against any benefit to them or the wider community before committing to a volunteering role.

It will require organisations to ask people if they qualify and for any required evidence for qualifying for the reduction: creating an additional admin burden for both org and volunteer.

Please provide further details to support your answer to the question 'What impact do you believe the proposal to introduce fee reductions for people in receipt of certain benefits and care experienced young people will have on volunteers?'

Would make it more difficult to volunteer and many people would consequently miss out on all the many positive benefits volunteering brings. Would increase inequality, especially with the ongoing cost of living crisis.

They simply will not volunteer

Again, this is too broad a sweep - generalisations like this do nothing but create uncertainty and there's no one size fits all approach.

There may be some resentment amongst volunteers if some people pay and others don't. There are many volunteers who are not in receipt of qualifying benefits but nevertheless are on tight budgets.

I think it could create a divide and a power imbalance.

May require further training which takes time from the volunteer as well as person supporting the volunteer. This may lead to overwhelm and capacity challenges.

It is adding a level of information gathering that feels invasive for a volunteering role. Starting with 'everyone' knowing your business.

Damaging to their self esteem and confidence as having to share personal info etc.

Fees are in any event too high. Volunteers should be supported in their efforts.

It will clearly be stigmatising for people.

Please share any further thoughts or feedback you have about the proposals.

The proposals are essentially a tax on volunteering and are very concerning. Will have significant negative impact if they go ahead.

<p>Do the people proposing this understand the economic climate? This is a disgrace.</p>
<p>It's false economy and an unfathomable decision. Why would you ask volunteers to freely contribute their time and then charge them for the privilege. This approach could reduce the number of volunteers further and also put children and protected adults at increased risk.</p>
<p>Any introduction of fees on the third sector for PVG checks will hamper the sectors ability to support and develop volunteers and facilitate employability.</p>
<p>The fee waiver is such a valuable scheme across the voluntary sector and our organisation would be gutted if it got changed.</p>
<p>It goes against the message that I have been trying to get across about volunteering- that it isn't something you need to commit to for a long term, it is easy to get involved/people don't need to know everything about your background. Even if it doesn't actually make it harder to volunteer, the perception that it does is enough to put people off as is word of mouth.</p>
<p>Many organisations would not be able to function without volunteers. These organisations play a vital role in supporting local communities. A good example was during covid. what would of happened then if organisations would of needed to pay of fee for PVG's. Enough is enough! Many third sector organisations are already struggling, why increase their burden!</p>
<p>We are really unhappy with the proposals and feel they will be damaging to volunteer recruitment and the charities at a time when we need volunteers more than ever and those volunteers most likely to benefit the most from their volunteering, are likely to be those who are put off by this.</p>
<p>My main concern is that the pool of volunteers will shrink, meaning cutbacks to the wellbeing services we currently provide, which will then have a knock on effect on statutory services. It should also be recognised that volunteers get a lot out of their volunteering roles, which they could now potentially miss out on. This is in addition to the sad loss of the skills & commitment these volunteers bring.</p>
<p>It's going to out more people at risk as checks reduce</p>
<p>worries that this will criminalise small organisations and groups who are doing great work, there is a lot of unknowns Could put people at risk, organisations cut corners regards completing disclosures and this could have a negative impact on child and adult safeguarding</p>
<p>The need for multiple fees for PVG certification for different, separate but similar roles is hard to justify. It's seen in the sector as a money-making scheme.</p>
<p>The proposals/options are completely self-defeating in light of both (a) the third sector running costs crisis and (b) the SHS 2022 reduced rates of formal volunteering in activities and services for children/young people and in health, disability and wellbeing.</p>



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