



# YouthLink Scotland

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

## Overview

YouthLink Scotland is the national agency for youth work. We are a membership organisation representing local, regional and national youth organisations from the voluntary and statutory sectors. We aim for a nation that values its young people and their contribution to society, supported through critical relationships with youth workers to achieve their potential.

As the collective voice of the youth work sector, we represent its interests, policy, and practice needs. We campaign for equal access to high-quality youth work for all young people, supported by a confident, skilled, well-led, and effective workforce while playing an essential role in delivering Scotland's national outcomes.

Youth work is one of the most powerful community-based assets that can help us create a better society. The practice nurtures confidence and boosts educational attainment. It stimulates personal development and helps young people manage relationships. It provides volunteering opportunities and assists young people who come into contact with the law. It aids a young person's mental health and positively respects and promotes the fundamental rights of children and young people in Scotland<sup>1</sup>.

YouthLink Scotland wishes to see a country where children's and young people's rights are recognised and rooted deep in our public and voluntary services. We know youth work is essential in supporting young people in understanding and using their rights and enabling critical service providers for children and young people to do the same.

## Introduction

This response was developed following consultation with YouthLink Scotland members and partner organisations. In particular, we have taken account of the views of the [National Voluntary Youth Work Organisations Scotland Network](#). The network allows national voluntary youth work organisation CEOs to meet regularly to facilitate peer support on management issues and enable discussion and response to key policy issues that impact voluntary youth organisations. As part of a discussion on the consultation, the group took a strong view on Disclosure Scotland's proposed plan to remove the membership fee waiver for the Protection of Vulnerable Groups (PVG) scheme. They said, "This would increase stress on already threadbare youth work services". Following this, they asked YouthLink Scotland to oppose this proposal in the strongest possible terms. This led to the organisation's [position statement](#), clearly outlining that the fee waiver should remain. We made this position known again with a rationale as part of our member engagement and [support package](#) to encourage groups to respond to the consultation.

Following a further meeting with the group, which included a presentation from a representative from Disclosure Scotland, we agreed to focus our reply on [questions 6 and 7](#) related to our unified belief that removing the fee waiver will have a substantial negative financial impact on already stretched voluntary sector organisations—to the point that it might mean some organisations cannot operate or cannot be sustained under the current model.

We believe this would send a negative message about how the Scottish Government values volunteering and the voluntary sector and the significant benefits both bring to the economy and society. We agree with [Volunteer Scotland](#) that such a move is akin to a "tax on volunteering" and that the Scottish Government should intervene.<sup>1</sup>

While there is support for waiving the suggested fees for target groups, placing the burden of off-setting on the voluntary sector and volunteers is unfair. It amounts to the voluntary sector subsidising the private and public sectors.

From our consultation with stakeholders, we believe these proposals would be a damaging and deeply unpopular move that could lead to significant

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<sup>1</sup> [PVG fee proposal for volunteers seen as a potential 'tax on volunteering' - Volunteer Scotland](#)

stakeholder resentment towards the Government. We ask the new First Minister and Depute First Minister to make the first six months of their tenure one that supports and signals to volunteers and future volunteers, the voluntary sector, and the many vulnerable and minoritised people supported by volunteer youth workers in communities across Scotland that they can rely on you for support.

## Questions

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

[don't know]

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

We understand organisations that engage volunteers in regulated work are not 'Qualifying Voluntary Organisations' (QVOs). Most non-QVOs are in the public sector, including schools, hospitals, and many care homes. Therefore, many volunteers in regulated roles will likely be ineligible for the proposed discount. Many youth work organisations involving volunteers in regulated work, both QVOs and non-QVOs, cover any costs for PVG membership. As such, the cost-benefit may be noticeable to the organisation. However, Volunteer Scotland's engagement with Policy Champions Network (PCN) members found that organisations are concerned that this proposal will harm their ability to engage volunteers who qualify for the fee discount. In a related survey of PCN members about the proposals in this consultation, over half of the respondents felt that introducing fee discounts for people receiving certain benefits and care experienced young people would hurt their ability to engage these groups as volunteers. This view was echoed by YouthLink Scotland policy planning group members, who expressed concern at asking volunteers to disclose the sensitive personal and potentially stigmatising information required to ascertain eligibility for the fee discount. This was reflected in Volunteer Scotland's consultation event, where one attendee stated:

*"The difficulty is that you're putting the responsibility on 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 concern for people who are volunteering within their local community. Volunteers and leads in organisations might not feel comfortable disclosing this type of information if the person recruiting them also lives in their community. We believe this could lead to people being driven away from volunteering.

We recommend further consultation with people receiving benefits, including those in voluntary roles, to better understand if the proposal's benefits outweigh the challenges noted.

There has been no financial modelling that supports the off-setting equation. Introducing fees for volunteer registration will create income that far exceeds what would be needed to offset the proposed fee waivers for target groups.

We would support a discussion on a universal fee waiver. We would view this as an investment in the sector that provides a massive social return and removes the multi-tiered system that potentially pits volunteers against volunteers and the communities they work alongside.

**Question 3—Do you agree with Option 1's proposal to provide a fee discount for care-experienced young people?**

[don't know]

**Question 4—Do you agree with Option 2's 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?**

We understand the intention of this proposal to increase the likelihood of non-QVOs recruiting care-experienced young people as volunteers to benefit from the fee discount. However, please see the answers to question 2 about administration, stigma, and uncertainty about direct community connections. There is significant concern about the negative impact of disclosing or needing to "*prove*" personal information or characteristics. This could endanger other areas of the Scottish Government's business, notably delivering the Promise by 2030. This is a laudable proposal; however, it needs further consultation with those affected or organisations representing care-experienced people. This could equally be applied to the question around discounts for those who receive certain benefits and counter-intuitive to the

First Minister's priority in the new office, which is to eradicate child poverty in Scotland – which, as we know, often intersects with care experience.

**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?**

As stated in our introduction, removing the fee waiver for volunteers in Qualifying Voluntary Organisations would considerably damage voluntary organisations, volunteers, and vulnerable people across Scotland.

From the Volunteer Scotland PCN survey, we know that 79% of respondents felt that the proposal would harm their or the organisations they represent. This is mainly because most volunteer-involved organisations ensure that volunteers are not out of pocket because of their volunteering.<sup>2</sup>

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 point came through strongly from voluntary youth work Chief Executives up and down the country, including Youth Scotland, Scouts Scotland, Girlguiding Scotland, Princes Trust, Venture Trust and many more. The inherent difference between volunteers and paid staff further exacerbates the potential cost of this proposal to voluntary organisations. According to [the Volunteer Scotland analysis, in 2018, volunteers in formal roles contributed](#), on average, 2.4 hours per week. Approximately 14 volunteers contributing 2.4 hours per week would equate to one full-time 35-hour week paid employee. PVG fees do not account for the number of hours an individual is undertaking regulated work, meaning that the PVG cost is much higher when recruiting volunteers than paid staff. In addition, due to the non-contractual, voluntary nature of volunteering, the turnover is often far higher than that of paid staff. This would undoubtedly be the case at peak times in youth work organisations where 100s of young people need to be supported through various camps and holiday periods. Organisations unable to meet the total cost of PVG fees for their volunteers in

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<sup>2</sup> This is in alignment with the Volunteer Charter, which states no one should be prevented from volunteer due to costs.

regulated roles will likely face cuts in volunteer-led services and opportunities for children and vulnerable adults.

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 choose between 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 prefer more flexibility in their volunteering roles to ensure they fit in with other commitments.

One respondent to the PCN survey stated that:

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

This suggests that charging a fee for recruiting volunteers for roles with vulnerable groups would significantly affect many organisations' ability to offer the level of flexibility that many people need.

There is a risk, particularly in the current financial climate, that organisations that cannot afford to absorb the PVG membership fees will have to pass the cost on to volunteers. This would be a significant challenge for many volunteers, particularly low-income ones.

Volunteer youth workers also help to ease the pressure on our statutory services. From speaking with youth work leaders in the heart of local authorities all over Scotland, we know that any proposal negatively impacting the level of partnership opportunities and provision in these areas will be met with stiff resistance. In short, this move will be counterintuitive to providing quality public services.

We believe the accompanying Children's Rights and Wellbeing Impact Assessment could explore the proposal's potential impact on removing the fee waiver for volunteers to provide services for children and young people.

For all the reasons outlined, we urge the government to maintain the fee waiver in the strongest possible terms. YouthLink Scotland and its members support the status quo.

**Question 8 – Do you agree with the proposal to increase the accredited body registration fee to £120 with additional countersignatories continuing to be £15.00 per addition?**

[no]

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.

**Question 9 – Do you agree with introducing an account upgrade fee?**

[Don't know]

**Question 10—What information do you think we need to consider regarding the accredited body registration fee?**

Many volunteer youth work organisations use the lower disclosure levels—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.

**ENDS**

Contact YouthLink Scotland Policy and Research Manager, [kkane@youthlink.scot](mailto:kkane@youthlink.scot), for more information.

**EDITOR'S NOTES**