

Response ID ANON-TE2C-71RV-X

Submitted to Disclosure Scotland fees: discounting, waivers and accredited bodies consultation
Submitted on 2024-05-26 17:21:24

Discount for people in receipt of benefits

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

Yes

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

Please give us your views:

The Salvation Army supports initiatives to help people find work and participate as active agents in our common social life. Applicants in receipt of benefits will often be experiencing difficulties in covering their daily living costs, and discounting the fee for people in such circumstances will remove a significant obstacle and disincentive.

The Salvation Army notes, however, that this will be the case only if and when the applicant bears the direct cost of the application.

Furthermore, while supporting this proposal in broad principle, The Salvation Army is opposed to financing these discounts by introducing fees for volunteer applications. The Salvation Army urges the Scottish government to seek other revenue streams to finance this proposal.

Discount for care experienced young people

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

Yes

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

Yes

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

Please give us your views:

The Salvation Army recognises that this proposal is designed to encourage care experienced young people to apply for roles which require PVG membership and intends to counter the reluctance they might feel by the prospect of their personal history might be disclosed. The Salvation Army supports initiatives to help people find work and participate as active agents in our common social life, and in broad principle therefore supports the proposals to discount application fees for care experienced young people.

As with the proposal for a discount for those in receipt of certain benefits, The Salvation Army notes that this incentive will take effect only if and when the applicant bears the direct cost of the application.

Furthermore, while supporting this proposal in broad principle, The Salvation Army is opposed to financing these discounts by introducing fees for volunteer applications. The Salvation Army urges the Scottish government to seek other revenue streams to finance this proposal.

Discount for volunteers

6 Do you agree with the proposal to move to a fee discount for volunteers in Qualifying Voluntary Organisations?

No

7 What information do you think we need to consider when proposing moving to a fee discount for volunteers in Qualifying Voluntary Organisations?

Please give us your views:

The Salvation Army is opposed to this proposal. The proposal is described as a "fee discount". However, since fees are waived for volunteers under the current arrangement, the proposal is really to introduce an additional cost for voluntary organisations, including those linked to churches and faith communities. The Salvation Army has serious concerns that introducing fees for voluntary applications would place many voluntary sector organisations under significant financial pressure and could adversely affect their viability, leading to a significant reduction in the services that the sector offers to civil society. The Salvation Army therefore urges the Scottish government to consider that:

1. The voluntary sector makes a significant contribution to Scottish society. As pointed out in a recent paper from the Royal Society of Edinburgh "third sector organisations can help to reduce public expenditure, either by providing services in health, social care, or education, which the state would otherwise have to provide or by reducing the need to use public services". The introduction of a fee for volunteers, even at the discounted rate proposed,

could increase the financial pressure on third sector organisations, including churches and faith communities, which often have limited financial resources and are already struggling to maintain their services. Many smaller organisations might find that their operations are no longer sustainable. Even in larger organisations, the costs associated with volunteers are often carried by local budgets, which would be placed under extreme financial pressure. There is therefore a serious risk that introducing fees for volunteer applications could lead to a reduction in the services offered by the voluntary sector, with some organisations finding they are unable to continue.

2. The financial pressure that introducing a fee for volunteer applications will place on voluntary sector organisations, including those associated with churches and faith communities, will be further exacerbated by the recurring costs of renewing PVG membership every five years. The consultation document does not set out a clear proposal for this recurring cost, but even if it is fixed at a level equivalent to the current charge for a statement or confirmation of scheme membership, this will represent a significant cost for voluntary sector budgets.

3. Volunteers are, by their very nature, free agents who can withdraw their service at any time. It is not unusual for a volunteer to quickly find that they are not comfortable or suited to the role in which they find themselves. It is therefore more than likely that voluntary organisations would sometimes find that they were paying for volunteer applications which did not then yield the benefit hoped for. The introduction of fees for voluntary applications is especially unwelcome in the light of post-pandemic trends, with many voluntary organisations, including churches and faith communities, reporting significant reductions in the number of people volunteering.

4. While recognizing that the revenue from the proposed fees would cover only a third of the cost of processing volunteer organisations, The Salvation Army is concerned that introducing a fee for volunteer applications might well lead to a significant reduction in the services provided by voluntary organisations, some of which would cease to operate. The likely reduction or cessation of services will in turn have a significant negative effect on those served by the voluntary sector, who are often already facing serious difficulties.

5. The Salvation Army recognizes that this proposal is designed to ensure the future sustainability of discounting fees for applicants in receipt of certain benefits and for care experienced young people. The Salvation Army supports those proposals in principle, but for the reasons set out above, believes that they should not be financed, even in part, by the introduction of fees for volunteer applications. The Salvation Army accordingly urges the Scottish government to find alternative revenue streams to finance these proposals.

Fees for accredited bodies

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?

Yes

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

Yes

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

Please give us your views:

The Salvation Army recognizes that the proposed increase is equivalent to the rate of inflation and accepts that the proposed increase is reasonable.

Partial Impact Assessments

11 What information do we need to consider for the Business and Regulatory Impact Assessment?

Please give us your views:

The Salvation Army has no comment to make on this matter.

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

Please give us your views:

The Salvation Army has no comment to make on this matter.

13 What information do we need to consider for the Fairer Scotland Duty assessment?

Please give us your views:

The proposals to offer discounts for applications made by people in receipt of certain benefits and by young people with experience of care will provide helpful incentives for these groups and remove obstacles that might hinder or discourage them from making applications.

These are, however, off-set by the proposals to introduce fees for applications made by volunteers, which may reduce the numbers of volunteers, whether directly in cases where they are asked to defray the cost of the application, or indirectly by placing a burden on voluntary organisations, whose budgets are already under extreme pressure. It should also be remembered that if voluntary organisations find themselves unable to continue providing services, this will negatively affect those whom they support and serve, who are often from groups and demographics who are often experiencing significant deprivation in various forms.

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

Please give us your views:

The Salvation Army has no comment to make on this matter.

15 What information do we need to consider for the Island Communities Impact Assessment?

Please give us your views:

The Salvation Army has no comment to make on this matter.

About you

16 What is your name?

Name:

David Cavanagh - Assistant Secretary for Scotland (The Salvation Army)

17 Are you responding as an individual or an organisation?

Organisation

18 What is your organisation?

Organisation:

The Salvation Army - Scotland Office

19 Further information about your organisation's response

Please add any additional context:

Together with other third-sector organisations, The Salvation Army took part in a conference call meeting with representatives of Disclosure Scotland to discuss the proposals, and discussed the proposals with a number of partners in the third sector.

This response, drafted by The Salvation Army's Scotland Office, was also reviewed by The Salvation Army's Public Affairs Unit and the Safeguarding Department.

20 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

21 Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

22 What is your email address?

Email:

scotland@salvationarmy.org.uk

23 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

24 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly dissatisfied

Please enter comments here.:

The format does not always reflect properly the potential concerns of people and bodies being consulted, and therefore obliges respondents to raise issues in the free-text comment sections.