

Accredited body fees and proposals for discounting in relation to the PVG Scheme

Introduction

The Scottish Government has opened a consultation and is seeking views to enable them to consider a new fee structure for the different types of disclosure under The Disclosure (Scotland) Act 2020. This includes membership of the Protecting Vulnerable Groups (PVG) scheme and changes to how discounts and fee waivers are applied to volunteers and other groups.

This briefing document is aimed at highlighting the key implications which these changes may have for sport as well as the consultation questions which are being asked and help inform Scottish Gymnastics clubs about some key considerations prior to clubs completing the consultation process.

Proposed Changes That May Impact Sport

The Scottish Government is proposing the following broad changes:

- an increase in the cost of obtaining a PVG from £59 to £70.
- removal of lifetime membership meaning an additional fee would be required to be paid every five years.
- removal of the current fee waiver for volunteers meaning an end to free PVGs for volunteers. A separate fee would be charged for each organisation an individual volunteers for.

Volunteers in gymnastics clubs could include: safeguarding officers, club officials, young leaders and helpers. The proposals would mean an end to free PVG membership for these roles. Instead, Disclosure Scotland is proposing to apply discounts for people on benefits, care experienced young people and volunteers. However, the current scheme provides a fee waiver (free PVG) for all volunteers including those on benefits and care experienced young people. These discounts would therefore mean an increase in costs for volunteers from these groups and all volunteers involved in sport and other voluntary organisations.

These changes could:

- create an additional barrier to people volunteering and ultimately may stop people volunteering within sport.
- provide an additional financial burden on sports clubs and individuals.
- increase the risk to children, young people and people from vulnerable groups as some individuals and clubs may decide not to get a PVG for financial reasons.

Scottish Gymnastics will be responding to the consultation however we would encourage all clubs to also respond and make their thoughts known.

PVG Fees

Disclosure Scotland is proposing that the fee in year one (1 April 2025 to 30 March 2026) for a disclosure with PVG scheme membership (level 2) information will rise from £59 to £70. This increase is detailed in the consultation document but does not form one of the areas on which a response is requested.

In addition, Disclosure Scotland proposes that, from April 2026 onwards, the fee structure for PVG scheme membership will move from a lifetime membership to a 'five-year membership model'. This will mean that a recurring renewal fee will be due at the end of a scheme member's five-year PVG scheme membership period.

Example

A coach who is working with children and is paid is required to join the PVG scheme. Currently this would incur a one-off fee (lifetime membership) of £59.

Under the new fee structure, the initial cost for a five-year PVG scheme membership for the coach would be £70 (an increase of 19%).

Should the coach continue in their role beyond five years they would be required to renew their membership of the PVG scheme at an additional cost. This cost has not been confirmed but may be the same as the initial joining fee, £70.

Volunteers and PVG Fees

Currently, Disclosure Scotland waives fees for any applications to join the PVG scheme and all subsequent disclosure records when people are doing regulated work in a voluntary and unpaid capacity for a Qualifying Voluntary Organisation (QVO) such as a Scottish governing body of sport.

Disclosure Scotland is considering if they can provide broader support to households on benefits or who face additional barriers through a history of care experience. They argue that this broader support will only be achievable if costs can be balanced.

As a result, there is a proposal to move to a fee discount structure for volunteers doing regulated roles. The proposed discount is a 60% reduction of the full fee for a volunteer. For example, a £70 PVG scheme joining fee would be discounted to £28.

Example

A volunteer club safeguarding/child wellbeing & protection officer is required to be a member of the PVG scheme. As a volunteer their membership of the scheme is free of charge if through a QVO.

Under the proposals, free volunteer membership would be removed and replaced with a discount meaning a charge to the volunteer of £28 to join the scheme with a renewal fee payable after five years.

Consultation

The consultation document does state that no decision has been made on this proposal and retaining the fee waiver continues to be an active option.

It is therefore important that both SGBs and clubs provide input to the consultation process and this briefing highlights some key areas for consideration when responding.

View the [Consultation Document](#)

You can make an online [Consultation Response](#)

The consultation seeks responses on five different areas.

- 1 Fee discount structure for people in receipt of certain benefits
- 2 Fee discount structure for care experienced young people
- 3 Fee discount structure for volunteers
- 4 Accredited body registration fee
- 5 Various Impact assessment factors

You may not wish or feel able to answer all the questions in this consultation and you are not required to respond to all of them. There are links to each of the sections and you can simply click the link(s) for the questions which you wish to answer.

You may wish to respond to the questions in relation to people in receipt of certain benefits and/or care experienced young people. But the focus of this document is in respect of volunteers, whilst recognising that there may well be some crossover between these three groups.

Volunteers – Consultation Questions

The consultation document only asks two direct questions about the proposed fee discount system in respect of volunteers:

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

- Yes
- No
- Don't know

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

The first question simply provides you with an opportunity to give your view on whether you agree to moving to a fee discount system. It has a degree of potential ambiguity and no clear opportunity to state that you are not in agreement with the primary outcome of any such system which is that obtaining a PVG for a volunteer

will no longer be free. If you answer 'No', is that interpreted as you don't agree with a fee discount system because you think that PVGs for volunteers should remain free? Or, is that interpreted as being that you don't think volunteers should receive a discount at all?

Disclosure Scotland has argued that part of the reason for introducing fees for volunteers is to provide broader support for households on low incomes or those with a history of care experience. There will obviously be individuals who are currently on a low income or care-experienced, but who do not pay a PVG fee because they qualify for the existing waiver as a volunteer.

However, there are avenues for using the consultation to submit a more comprehensive opinion about the fact that moving to a fee discount structure for volunteers will in effect result in a significant fee as opposed to the current fee waiver.

This would be possible by completion of either:

1 The second question in the section on volunteers – question 7 in the online response:

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

Or

2 Question 14 in the online response relating to impact assessments:

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

Clearly, it will be important that your response reflects your own views or those of your club and the assessment of the potential impact of these proposed changes. You can set these out through completion of the questions suggested above and in so doing then some of the factors which you may wish to consider are:

- Will the introduction of fees for sports volunteers act as a substantive barrier to volunteering with many sports relying on the input from volunteers? What would the impact of this be for your club?
- Will these changes create significant additional costs for your club that would impact on your ability to fund other participation programmes or gymnastics activity? What would the impact of this be on children's rights to have access to play and sport?
- Could these changes prevent people from applying to be volunteers?
- Will this create significant, additional administration for both SGBs such as Scottish Gymnastics and your club?
- Could this impact on the safety of sport if clubs/individuals decide not to get a PVG for financial reasons?
- When the new Act comes into force, volunteers will be required to pay a PVG renewal fee after a five-year period. The proposal is that a similar level of discount (60%) would be applied, but this will still result in an additional cost

for volunteers every five years. What would the cumulative impact of such renewal fees be?

- What would the impact be on individuals who volunteer with more than one organisation and may be faced with multiple fees?

The consultation does not ask about the actual level of the increased charges which you may feel is an important omission. You may have a view on this proposal and you wish to include this within your consultation response.

Conclusion

This document does not intend to set out the specific details of any response which you might choose to make but rather to highlight:

- the proposed changes;
- the avenues open to expressing your views through the consultation process effectively;
- and some of the sports volunteer related questions that you may wish to consider in doing so.

However, this is an open consultation process, and it is important for as many sports-related organisations to have their views heard.

The consultation closes on Tuesday 28 May 2024.

View the [Consultation Document](#)

Make your online [Consultation Response](#)