

Full Time Social Action Review call for evidence Response

10 October 2017



The Heritage Alliance is England's biggest coalition of heritage interests, bringing together over 100 mainly national organisations supported by over 7 million members, friends, volunteers, trustees and staff. From historic buildings and museums to canals, historic vehicles and steam railways, the Heritage Alliance's diverse membership owns, manages and cares for the vast majority of England's historic environment.

Heritage volunteering represents 6% of all voluntary work undertaken in England¹. The sector simply could not function without the support of volunteers. The numbers rose from 575,300 in 2014/15 to 615,500 in 2015/16 - more than the population of Glasgow!²

We are very grateful for the time they donate and would like to encourage more young people to volunteer with us. The estimated economic value of heritage volunteering, based on National Minimum Wage rates, was £520.1 million in 2015/16. If based on regional median hourly earnings this rises to £909.9 million³.

The Heritage Alliance recently held an event looking at heritage and health which highlighted, among other things, how heritage volunteering can support volunteers' physical and mental health and explored the future for social prescribing of heritage volunteering. We hope that the Government will continue to encourage the NHS to further explore these benefits with the heritage sector.

Nearly all heritage volunteering will fall within the definition of social action as [set out in the review](#) as 'practical action in the service of others to create positive change; this includes fundraising, supporting charities, tutoring and mentoring, supporting other people and campaigning'.

Before turning to the questions, it is important to first address the concept of 'Full Time'. We would agree that 'there is no widely held definition of full-time volunteering'. However, the natural everyday meaning of the words full times suggests Monday – Friday 9am to 5pm. This is significantly different from the Government's definition of 'full time' as, on average, at least 16 hours a week of social action activities for 6 months or more. The natural definition is closer to the high-hour, low-frequency volunteering such as a one-week placement working 40 hours also identified by the call for evidence.

Calling volunteering opportunities full time, which are in fact only looking for at least 8 hours a week, may put off young people, or indeed anyone, who has other responsibilities.

¹ <https://content.historicengland.org.uk/content/heritage-counts/pub/2017/heritage-and-society-2017.pdf>

² Population of City of Glasgow in 2011 census was 593,245
<http://www.glasgow.gov.uk/CHttpHandler.ashx?id=16943&p=0>

³ See page 13 <https://content.historicengland.org.uk/content/heritage-counts/pub/2017/heritage-and-the-economy-2017.pdf>

What experience have you had of full time social action / volunteering, either as a young person or as a provider for young people? –

The Alliance itself has not had any experience of full time high hour low frequency volunteering due to concern that this may result in us, a charity with limited resources, becoming liable for the national minimum wage if the expectation of full time work was created.

The recent [Taylor review of modern working practices](#) states that ‘If a person is obtaining something of value from an internship, they are most likely to be a worker and entitled to the National Minimum or Living Wage’. The report goes on to recommend that ‘The Government should ensure that exploitative unpaid internships, which damage social mobility in the UK, are stamped out. The Government should do this by clarifying the interpretation of the law and encouraging enforcement action taken by HMRC in this area’.

The Alliance is very much aware of the huge importance of offering volunteer opportunities which result in improved experience and job eligibility. To ensure we can offer volunteering opportunities we took legal advice to the effect that, notwithstanding the Taylor review, the labels used (whether “intern” or “volunteer”) are not determinative one way or the other, and each case will depend on the specific facts and the nature of the arrangements entered into. The key question to ask is whether, based on all the facts and circumstances, the person in question is an “employee”, a “worker” or an individual protected from discrimination under the relevant statutory provisions.

A key way to avoid a volunteer becoming a worker is to ensure flexibility – i.e. emphasise the voluntary nature of the placement and avoid creating what could be perceived as binding obligations on the part of the volunteer. In our experience, our volunteers are happy being just that – one has expressed alarm at the idea of a requirement for minimum wage meaning that they could no longer volunteer in the way they wish.

As a result of these concerns, we have had experience of full time volunteering which meets the Government’s definition of at least 16 hours a week. We have had positive feedback from our volunteers and have sought to ensure that we have tailored what we offer to the experiences that they are looking for. They have all gone away having gained useful skills and experience. It is likely that many of our members will have offered such schemes without terming them full time.

What impact does full time social action / volunteering have on young people and providers in comparison to part time social action / volunteering? –

This is difficult to answer given the problems with defining ‘full time’. However, we note that a particularly skilled individual can be just as valuable volunteering for less than 16 hours a week.

What are the barriers to full time social action / volunteering and can you give examples of how these might be overcome? –

The key barrier to more full-time volunteering being offered is the issue above relating to the National Minimum Wage.

The Government could provide certainty for charities etc which provide opportunities for volunteering/ social action that they will not be liable for the national minimum wage.

The Government could also consider providing funds to allow organisations to offer full time social action which pays the national minimum wage for a set period of say a month to allow young people to learn skills that can help them develop.

Should there be an expansion of full time social action / volunteering opportunities for young people, and do you have any evidence of unmet need or demand? –

The review does not propose how it will expand social action. It is likely that there are many organisations within the heritage sector which could offer full time volunteering if it was clear that they could offer this without being liable for the national minimum wage. However, any expansion of full time volunteering should not jeopardise the availability of part time volunteering opportunities which are also very important.

While the heritage sector provides many volunteering opportunities it is unfortunate that, due to a lack of resources in the sector in general, many social action/volunteers are not sufficiently remunerated. Support to provide paid opportunities would significantly help to diversify the younger generations engaging in heritage and becoming tomorrow's leaders.

While we would welcome an expansion of social action / volunteering opportunities, the maximum benefit will only be derived for the most people if the barriers listed above are not addressed.

If you were to propose up to three things to enable more full time social action / volunteering, what would they be?

- 1) Clarity on the national minimum wage/ the meaning of full time
- 2) Funding to ensure that the experience isn't just open to the well-off e.g. bursaries to charities to provide full time opportunities paying the minimum wage
- 3) A wider programme/national hub to advertise opportunities to young people from a diverse range of communities.

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