



**Submission to Protection of Freedoms Bill Committee, with respect to the reform of the Vetting and Barring Scheme**

While we wholeheartedly support the abolition of the vetting database, and the direction of the government's reforms, it is our view that fundamental problems remain with the Protection of Freedoms Bill. At base, these problems spring from the fact that the government decided to reform the Safeguarding Vulnerable Groups Act 2006, rather than to abolish it.

- **1. The Freedom Bill preserves the essential mistrust about everyday relationships between adults and children.** In retaining the concept of 'regulated activity' – that is, a certain 'intensity' of working relationship with children - the Freedom Bill has failed to reform the mistrustful foundations of the Safeguarding Vulnerable Groups Act. The Freedom Bill retains the assumption that adults' 'relationships of trust' and repeated contact with children are potentially abusive and inherently high-risk. As the author Philip Pullman put it, this 'assumes that the default position of one human being to another is predatory rather than kindness.' This assumption is damaging - it is also untrue, since the vast majority of adults working or volunteering with children are entirely decent and wish only to help them. Public policy should recognise the reality of abuse as an unusual and perverted phenomenon, rather than an everyday reality that is a default assumption. **Recommendation: We call for the scrapping of the concept of 'regulated activity'.**
  
- **2. The Freedom Bill retains the regulation of the informal and voluntary sector.** The Freedom Bill retains the legal obligation for the vetting of volunteers - ie, those working 'not for gain'. The vetting of volunteers was almost unknown before 2002 – and occurs in no other European country - and represents an unprecedented and inappropriate state invasion into informal community relationships. Under the Freedom Bill, it will remain a crime for a father to regularly coach his son's football team without first being CRB checked. This requirement cannot but undermine volunteering, creating unnecessary red tape and putting off potential volunteers. **Recommendation: We call for the abolition of all CRB check obligations for volunteers.**

- **3. The Freedom Bill remains extremely complex and will be impossible to enforce.** By further reforming the concept of 'regulated activity', the Freedom Bill has made the question of who must be checked even more complex and obscure. In our five years campaigning against the SVGA, we have frequently noted the confusion and lack of clarity over the question of who must be checked. The exemptions in the Freedom Bill only make this worse, and so the law will be impossible to enforce. For example, the Freedom Bill will require people to be checked if their work with children is 'frequent' or 'intensive' (which remain as defined by the Singleton Review), except when it is 'temporary' or 'occasional' (which have not, to our knowledge, been defined). Such categories make little sense in themselves – and even less sense when applied to the messy and irregular world of an organisation such as a boys' football club, which will be tasked with working out which of its coaches fall under the law. **Recommendation: Again, we call for the abolition of the concept of 'regulated activity'.**

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## **APPENDIX**

### **The Manifesto Club's Campaign Against Vetting**

The Manifesto Club has been leading the campaign against the vetting database for the past five years, and over that time has built up a national network of volunteers and others who are concerned about the damaging effect of over-cautious child protection rules. Our reports use on-the-ground testimonies and original statistics to chart the spread of child protection regulations throughout community life, and to put the case for a more common sense and liberal approach.

For more information, see: <http://www.manifestoclub.com/hubs/vetting>