



Submission to the Vetting and Barring Review

**By the National Society for the Prevention of Cruelty to
Children (NSPCC)**

November 2010

Introduction

The National Society for the Prevention of Cruelty to Children (NSPCC) is the UK's leading charity specialising in child protection and the prevention of cruelty to children. The NSPCC aims to end child cruelty in the UK by seeking to influence legislation, policy, practice, attitudes and behaviours for the benefit of children and young people. This is achieved through a combination of service provision, lobbying, campaigning and public education.

The NSPCC has campaigned for evidenced-based improvements to the vetting and barring legislation and for a range of complementary measures that will better protect children. This has included working on the Vetting and Barring provisions during the passage of the Safeguarding Vulnerable Groups Act 2006 (SVG) through Parliament in 2006 and since then, working with officials in the Department for Education (DfE) (previously Department of Children Schools and Families (DCSF)), the Home Office and the Department of Health Social Services and Public Safety (DHSSPS) in Northern Ireland on the development and implementation of a range of complex issues contained in the legislation and Scheme.

This paper sets out NSPCC's thinking on the Vetting and Barring Scheme (the Scheme) to inform the Government's review and the commitment in the Coalition agreement to scale it back to common sense levels.

This paper has 5 sections:

- 1. The Background** – A brief history of the Vetting and Barring Scheme. When considering changes to the scheme, it is important to learn lessons from the past and ensure that government avoid re-introducing previous loopholes. **Page 3**
- 2. The Strengths of the VBS** – A summary of what should be retained in the existing Scheme. **Page 9**
- 3. Principles for remodelling the scheme** – The principles which should inform and underpin the remodelling of the scheme. **Page 11**
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As this relates to England, Wales and Northern Ireland references to the CRB should be taken to refer also to AccessNI and those to the primary Act be taken also to include the Safeguarding Vulnerable Groups (NI) Order 2007.

At various points we make suggestions and recommendations to the UK Government.

1. The Background

1.1. Vetting and barring arrangements have developed in all four UK nations for the last 20 years through a multiplicity of various policy and legislative enactments. These developments were often made in response to specific cases of individuals abusing children and/or young people in their care, in circumstances where the employment and recruitment systems used at the time had failed to identify them as a risk. Key milestones have included:

- **The Warner Report (1992)**¹ followed the 1991 conviction of Frank Beck, officer in charge of four children's homes and an approved foster parent, for 17 offences of physical and sexual abuse of residents. It reviewed selection, development and management of staff in children's homes and provided detailed guidance for recruitment, selection, appointment, training and oversight of residential staff.
- **An Abuse of Trust. The Report of the Social Services Inspectorate Investigation into the case of Martin Huston, (January 1994)**²

Martin Huston was convicted in October 1992 of 25 sexual offences against six boys aged between nine and 13 years and sentenced to seven years' imprisonment. Prior to his arrest Huston had come into contact with a number of statutory and voluntary bodies, as a service user, a volunteer helper and as a worker. He had a previous conviction for sexual offences but because of the lack of established vetting at the time this was not picked up. The inquiry made a number of recommendations relating to various aspects of the recruitment of staff and volunteers and the management of sex offenders.

¹ Warner, N. (1992). *Choosing with care: the report of the Committee of Inquiry into the Selection, Development and Management of Staff in Children's Homes*. London: Her Majesty's Stationery Office (HMSO).

² Social Services Inspectorate (1993) *An abuse of trust: the report of the Social Services Inspectorate investigation into the case of Martin Huston*. [Belfast]: Department of Health and Social Security (DHSS).

- **Lost in Care (Waterhouse, 2000)³**. This was a public inquiry into the systematic abuse of children in care in residential establishments and foster homes in North Wales since 1974. The inquiry report made 72 recommendations and also highlighted the importance of robust selection and recruitment practices.
- **The Bichard Inquiry Report (Bichard, 2004)⁴**. The Bichard Inquiry looked into the circumstances surrounding the case of Ian Huntley who was convicted of the murder of two 11-year-old girls in Soham. Huntley had been screened and selected to be a caretaker in a community college where he had contact with children despite being known to have had illegal and abusive sexual relationships with young women and having been implicated in four allegations of rape between April 1998 and July 1999. The Bichard Inquiry which enjoyed all party support called for improvements to the vetting system and a new central system for registering those working with children and vulnerable adults, including continuous monitoring and appropriate sharing of non-conviction data. Key, within this, was recommendation 19 which recommended a registration scheme for the Children's and Vulnerable Adults' workforces which would be continuously updated.
- **Sex offenders working in schools controversy**. In January 2006, it came to light that the then Department for Education and Skills had granted permission for individuals with previous cautions or convictions for child abuse to be employed in schools. These individuals, and an unknown number of others who had sex offender notification requirements, were not on the DfES prohibited list, "List 99". In the wake of this, the then Secretary of State, Ruth Kelly, overturned advice that teachers did not need to apply for a new CRB check when they moved jobs within the local education authority.

³ Waterhouse, R. (2000) *Lost in care: report of the tribunal of inquiry into the abuse of children in care in the former county council areas of Gwynedd and Clwyd since 1974*. Summary of report with conclusions and recommendations in full. London: The Stationery Office.

⁴ Bichard, M. (2005) *The Bichard Inquiry: final report*. London: Cabinet Office.

- 1.2. These inquiries and reports emphasised the importance of robust vetting, selection and recruitment practices and revealed loopholes that could be exploited by dangerous individuals.
- 1.3. In reviewing the Vetting and Barring Scheme it is important to recognise the reasons for its introduction, the risks that exist when there are not robust vetting processes in place and that vetting is only one part of safe recruitment.
- 1.4. Sex offenders are often manipulative, charming and use deceit and lies to facilitate and hide their abuse of children. Vetting plays an important role in deterring, preventing and, on occasions, stopping unsuitable people gaining access to children. It re-assures parents and carers that their children are not being left in the care of individuals whom are already known to pose a risk to them.
- 1.5. The events set out above led to the development of administrative systems to prohibit people from working with children specifically: the creation of the Criminal Records Bureau (CRB); formal legislative barring arrangements in the Protection of Children Act 1999 (POCA) - in Northern Ireland The Protection of Children and Vulnerable Adults (NI) Order 2003; The Education (Prohibited from Teaching or Working with Children) (Amendment) Regulations 2007; Disqualification Orders and, eventually, the Safeguarding Vulnerable Groups Act 2006. The current vetting and barring arrangements were created to address **identified gaps and weaknesses in previous arrangements** contained in various UK provisions.
- 1.6. The current scheme is an improvement on the multiplicity of previous arrangements for many important reasons:
 - **Continuous monitoring** - a disclosure check only provides information that at a single point in time. In contrast, once an individual is registered with the Independent Safeguarding Authority (ISA) (if this provision is implemented), an employer will continually be updated on new information about an individual's status, including 'minded to bar' or barring information. The NSPCC sees continuous monitoring as an essential requirement of any scheme. Real time updating is vital to ensure an individual's suitability to work with children if it changes is able to be communicated to employers quickly.

- **Potential portability of Scheme membership** - Membership of the Vetting and Barring Scheme has the potential to be portable, thereby saving time and money for individuals and organisations. While some repeat CRB checks are envisaged for some posts, in addition to ISA membership, overall the requirement for repeat checks should be reduced. The most common criticism from the voluntary and community sector about vetting is having to do repeated and multiple checks often when the same individual performs a number of regulated activity roles. Portability is likely to be popular with organisations which use volunteers and other employers.
- **Better knowledge and up to date information on those who harm children** - the ISA has a more detailed picture of the activities undertaken by an individual than existed under previous arrangements and will be able to identify any patterns of behaviour across activities and organisations which may cause concern.
- **Consistent decision making** - there is better consistency and transparency to decision-making on barring, with one body (ISA) making structured decisions across three jurisdictions and with clear systems and thresholds. One centralised body taking barring decisions will allow expertise and better understanding of risks in sectors and roles to be developed as opposed to having differing UK lists with differing thresholds for barring and decision making.
- **Common requirements for referrals** - the legislation has introduced common requirements for Regulated Activity Providers (RAPs) to refer individuals who they have stopped from working in regulated activity on the grounds of harm or risk of harm. This is an improvement on arrangements in POCA which afforded non-statutory organisations more discretion in making referrals. Through our services and case work, the NPSCC has evidence of voluntary and community organisations not reporting individuals who have harmed children and as a consequence been dismissed or moved on from organisations.
- **Consistency across the UK** - we now have largely UK-wide arrangements. The existence of a common Scheme across England, Wales and Northern Ireland which has also been aligned with Scotland is to be welcomed. Improvements to

Part V of the Police Act 1997 and SVG Act regulations mean there is lawful common recognition of bars across the UK for the first time. Making fundamental changes to arrangements in E&W and NI at this stage will result in significant differences between these parts of the UK and the Protecting Vulnerable Groups (PVG) Scheme in Scotland⁵

- **Better links between regulated activity providers and information on barred individuals** - under existing law and procedure it is not always possible for the police to ascertain an individual's current employers or volunteer activity. The Scheme potentially provides the capacity for regulated activity providers to register an interest in someone who works for them. For individuals who work in a number of regulated activities, establishments and settings; this would allow employers to be more easily notified when someone is barred.

⁵ http://www.opsi.gov.uk/legislation/scotland/ssi2010/draft/pdf/sdsi_9780111008836_en.pdf

2. Considerations for the remodelling of the VBS and scale it back to common sense levels.

- 2.1. The list under paragraph 1.6 sets out how the Vetting and Barring Scheme is an improvement on the arrangements that preceded it. The improvements listed in 1.6 should be retained through any remodelling.
- 2.2. There is considerable evidence of the system of vetting having protected children and prevented unsuitable people working with children. The Criminal Records Bureau estimates the number prevented from working with children at 80,000 since the commencement of Enhanced Certificates⁶.
- 2.3. Removal of the safeguards set out in 1.6, including from the voluntary sector, would expose children to considerable risk from those who seek to harm them. We see no support from volunteer-led organisations to remove vetting requirements. There is, however, a desire to improve certain aspects of the Scheme to reduce administrative burdens, including simplifying the portal arrangements that interface between the CRB and the ISA.
- 2.4. There is also remarkably consistent evidence showing support for vetting and barring including from parents themselves. Various surveys have shown that:
- Nine out of ten CRB customers say checks improve the ability to protect children⁷.
 - 91% of the general public support checks for anyone working or volunteering with children⁸
 - 97% of parents supported vetting of volunteers in community and church-based activities⁹.
 - 85% of 724 customers (employers) found the disclosure certificate useful in making a decision on an individual's application¹⁰.
 - 75% of volunteers agreed that disclosure checks boost parents' confidence and are an important procedure to ensure children's safety¹¹.

⁶ http://www.crb.homeoffice.gov.uk/media/press_releases/new_electronic_applications.aspx

⁷ CRB Customer Research Programme (Year 6) December 2007 Ipsos Mori

⁸ CRB Ipsos Mori survey 2009

⁹ ACPC/NSPCC Ipsos Mori opinion poll in NI of 1000 adults 2008

¹⁰ Access NI survey 2010 Northern Ireland Statistics and Research Agency

¹¹ Child Protection legislation and volunteering in Scottish Sport, Sports Scotland, 2008

- 2.5. In one study, only eight potential volunteers responding (out of 166) reported that the prospect of a disclosure check had put them off volunteering. Disclosure checks were reported as a relatively unimportant barrier to volunteering. Time commitments, work pressures and a lack of skills were all reported as greater barriers for potential volunteers.¹² It has been claimed that vetting processes deter people from becoming volunteers, including negative and often inaccurate media reporting that has distorted this issue. We have seen no evidence of this.
- 2.6. Taken together, the surveys provide important information about how the public and other stakeholders value vetting and barring processes, and underscore the need to communicate these messages in the public domain where a small, vocal minority have made incorrect and misleading statements.

¹² Child Protection legislation and volunteering in Scottish Sport, Sports Scotland, 2008

3 Principles for remodelling the scheme

3.1. Based on past learning, and the strengths of the current Vetting and Barring Scheme, we have developed a number of principles which in our view should inform any remodelling of the Scheme:

- The safety and protection of children and vulnerable adults should be the primary consideration in all decisions made about the vetting and barring scheme.
- Evidence-based and demonstrable improvements introduced by the Safeguarding Vulnerable Groups Act 2006 should be retained and developed.
- The Scheme must be robust and vetting must be based on risk: jobs and roles which involve developing a position of trust with a child should be properly risk assessed and regulated. Positions where such a risk does not exist - for example where there is only irregular or informal (not frequent and intensive) contact with children such as a parent helping out on a school day trip – should not be regulated by the Scheme.
- The new arrangements should retain the ability to continuously monitor information. There should be processes to quickly update employers if new conviction information comes to light which leads to an individual being barred from working with children.
- There should be a process to capture non-conviction information or concerns, in order to identify any patterns of behaviour across activities and organisations which may cumulatively cause concern. It is critical that decisions about suitability should be based also on non-conviction data, not just on convictions. There are many dangerous people who pose a risk to children who do not have convictions and this is recognised widely in government policy such as the provisions in Working Together¹³ and Co-operating to Safeguard Children¹⁴. Consideration should be given to what constitutes non-conviction data to ensure it is substantive.

¹³

<http://www.dcsf.gov.uk/everychildmatters/safeguardingandsocialcare/safeguardingchildren/workingtogether/workingtogethertosafeguardchildren/>

¹⁴ Co-operating to Safeguard Children DHSSPS Belfast 2003

- Any scheme should be proportional, simple and cost effective for volunteers, employees or employers. The scheme should enable the majority of individuals to get clearance quickly and easily when starting a new post. Checks should be portable, enabling volunteers or employees to move between posts without additional costs or bureaucracy.
- There should be effective communication about any new scheme to help the public, parents and carers understand that it is good safeguarding practice. This communication should also ensure that no-one is discouraged from working with children and vulnerable adults because of misconceptions about what the scheme involves. The previous administration failed to challenge much of the misreporting associated with the Scheme.

4. NSPCC recommendations for Improvement

4.1. We consider that the fundamental features of the Safeguarding Vulnerable Groups Act and equivalent parallel Northern Ireland Order are sound. However we believe there are important areas for improvement.

4.2. We set out a number of specific areas for improvement below. Our suggestions are consistent with the principles outlined above, and would enable changes to the VBS without creating major risks to children's safety or undermining parents and carers' confidence about the ability of organisations to protect their children.

Controlled activity

4.3. The NSPCC has made previous submissions to Government on the need to review controlled activity¹⁵. Controlled activity is in essence a 'scheme within a scheme' and is inconsistently applied across sectors. Based on the principle of proportionality, we recommend that it is removed from the legislation and therefore the Scheme. Roles which include demonstrable opportunities to form relationships of trust with children and young people, such as a secretary in a FE college, should be included in regulated activity. Those which do not should no longer be within the VBS Scheme. Employers should use good employment practices interviews, references, etc to screen out unsuitable applicants from these types of ancillary posts.

Regulated activity

4.4. Definitions of regulated activity should be re-set. If the definition of regulated activity is drawn too widely it will capture too many posts where there is little risk, and if too narrowly, roles that involve risks will fall outside the scope of the Scheme. It will not be possible to legislate for every risk.

4.5. The definition of 'regulated activity', must capture all of those posts that involve frequent and intensive contact with children and young people in positions of trust (coaching, teaching etc) to ensure that barred people cannot take up such positions.

¹⁵

http://www.nspcc.org.uk/Inform/policyandpublicaffairs/consultations/2010/controlled_activity_in_VBS_wdf78385.pdf

- 4.6. The definitions of ‘frequent’ and ‘intensive’ were redefined by the Singleton Review¹⁶. The current formulations provide for sufficient flexibility in any requirement to carry out a check and make a distinction between someone undertaking regulated activity on a frequent basis and ad hoc activity. Thus, a parent helping out at a school disco at Halloween and Christmas is outside the scope of the Scheme, as are privately-made transport arrangements for children, while a swimming coach teaching children on a twice-weekly basis falls within the Scheme. The NSPCC is of the view that this is proportionate and common sense threshold.
- 4.7. Regulated activity, establishments and positions. We have examined the scope of ‘regulated activity’, ‘establishments’ and ‘positions’ within Schedule 4 of the Act. Regulated activity positions (Schedule 4(4)) involve some posts that may not have any contact with children, such as the trustee of a children’s charity. We are of a view that it would not significantly reduce safeguards to remove these from the Scheme. Where such a post involved frequent contact with children (or supervision of staff who do), for example if a trustee of a residential charity were to visit and speak to children on a weekly basis as part of their governance responsibilities, they could be covered by regulated activity.
- 4.8. With regard to regulated establishments under Schedule 4 (3), such as schools and Sure Start children’s centres, we would recommend these are left unchanged. The threshold established by the Act for vetting checks is reasonable, consistent with past practice and includes positions such as caretakers and administrative staff who are able to develop significant relationships with children by virtue of the setting in which they work. There is sufficient flexibility within the arrangements to allow parents to participate in activities that are not regular.
- 4.9. Requirements to check. Many of the examples reported in the media to illustrate why the Scheme is disproportionate are cases where a person has been checked for work that does not

¹⁶ <http://www.isa.gov.org.uk/default.aspx?page=414>

actually fall into the category of regulated activity. Government take steps to ensure this does not happen and where necessary produce clear guidance to restrict checks when posts do not fall within regulated activity. Many objections to the current Scheme are based on misconceptions and many of these checks are probably unlawful. We note the way in which AccessNI has restricted enhanced disclosures only to posts that fall within regulated activity or require a disclosure by virtue of an enactment and a similar approach in other jurisdictions may be helpful.

- 4.10. In addition employers should be encouraged to screen out posts that explicitly do not fall within the requirements of the Scheme. This may involve by redesigning roles to take out intensive or frequent opportunities for regulated activity when it is not necessary.
- 4.11. The Act in Sections 7-11 establishes a number of offences relating to both individuals and Regulated Activity Providers based on working in regulated activity while not monitored or barred. We are supportive of taking a common approach to this across sectors but can see some merit in the argument that statutory organisations are in a different place to a small developing voluntary group, without the same infrastructure or developed governance structures. It may be possible for the Government to introduce more flexibility to these provisions as they relate to voluntary and community groups. Section 16 of SVGA could be used to facilitate time-limited exemptions for the voluntary and community sectors in terms of the requirement to carry out a check. This would allow development of capacity and for arrangements to settle in.
- 4.12. The referral and barring data that is currently held by ISA should be reviewed to determine relevant information about the risks associated with certain offences or allegations, and with particular posts and roles. An assessment of this information would help to remove certain positions and roles from the definition of regulated activity.

Volunteers

- 4.13. We are aware that the Government is considering whether volunteers should come within the scope of regulated activity.

We consider that volunteers should remain within the scheme. No distinction should be made between paid and volunteer work. The Statutory Inquiry into Martin Huston (referenced above) provides clear evidence of why volunteers should be within the scope of the scheme and what can happen when they are not.

4.14. There is evidence of widespread support from parents and volunteering-led organisations for vetting arrangements. We have seen no evidence of vetting being a deterrent to volunteering. Taking these posts outside of the Scheme would increase parents' anxiety while not increasing the willingness of volunteers to volunteer.

The relationship between ISA and CRB

4.15. The major criticism of current arrangements by the voluntary and community sectors is the need for repeated checks, their lack of portability and the administrative burden this places on organisations. In extensive discussions with the sector and key stakeholders we have not experienced any desire to move away from checks *per se*, only a desire for a more streamlined system where bureaucracy is reduced.

4.16. Vetting and barring arrangements are legally complex. Some streamlining of the two systems of CRB checking and ISA monitoring should be a priority in any remodelling of the Scheme. CRB checking is well established and understood by the public but the complexity of parallel scheme membership is complex to explain. A danger to be avoided is ending up with two systems: ISA Scheme membership and repeat CRB checks.

4.17. Criminal record disclosures play an important part in providing employers with both conviction and relevant non-conviction data but are limited in that they provide a check only at a single point in time. We remain supportive of the intention behind Recommendation 19 of the Bichard Inquiry regarding continuous monitoring. The ISA membership Scheme as envisaged by SVG Act is one way to deal with this.

4.18. An alternative model on which to build a system of continuous monitoring would be to make criminal records more portable between employers. Such a system would require:

- Employers to be able to verify that an individual's Enhanced Disclosure Certificate is the most recent issued;
- The existence of any new criminal record information that would necessitate a new check as part of this verification;
- The capacity for employers to register an interest in an individual should they become barred by the ISA.

4.19. A further safeguard to ensure employers were advised about an individual's unsuitability and complement vetting developments would be to ensure that the provisions of the Home Office Notifiable Occupations Scheme¹⁷ fit closely any new remodelled vetting and barring arrangements.

Criminal records and disclosures

4.20. We welcome Sunita Mason's review of criminal records and future disclosures, particularly in respect of young people for whom a minor Schedule 1 conviction can have potentially lifelong consequences. We will be contributing separately to this review, but would like to highlight some key issues in this response. A conviction should not invariably act as a bar to working in regulated activity. Good assessment of risk is therefore important. This is a complex area, where filters may not necessarily work in every case. It may be desirable for the police (perhaps using the expertise of ISA) to have the discretion to withhold past offences where there is no degree of risk and no relevance to employment. NSPCC will produce more specific proposals on this issue in due course.

4.21. We support consistent application of ACPO guidance across the UK on the disclosure of non-conviction data to help ensure that it is used responsibly and consistently. The capacity to disclose relevant non-conviction data on the foot of an Enhanced Criminal Record check is important and vital to the fundamental architecture of the VBS. The majority of individuals who pose a significant risk to children do not have convictions

¹⁷ Home Office Circular 6/2006 The Notifiable Occupations Scheme

and without the capacity to disclosure under Part V of the Police Act 1997 would be concerning. There is important information, short of barring, which employers need to know and is relevant to recruitment.

Auto barring

4.22. We are aware of the High Court of Justice decision in *RCN v Secretary of State for the Home Office* and the ISA judgement on this issue relating to ECHR incompatibility of automatic barring and the capacity to make representations. The auto barring provision within the Act creates a number of thresholds for automatic listing, as did previous legislation. In the case of Disqualification Orders under the Criminal Justice and Courts Services Act, these were available by virtue of the length of sentence (12 months or more), but created the anomaly that an individual would have notification requirements under the Sexual Offences Act 2003 but because of the tariff of sentence come under the barring threshold.

4.23. The NSPCC's view is that some offences against children should always be grounds for barring. However, in light of the judgement, the Government should look further at the provision of representations *per se* and those convictions which trigger barring in advance of representations.

5 Beyond Vetting and Barring

5.1. We welcome the Government's acknowledgement that there needs to be more done to raise awareness and understanding of risk and responsibility for safeguarding in society more generally. Vetting is only one part of keeping children safe and we have repeatedly made this point during the development of the legislation and guidance.

5.2. Protecting children is everyone's responsibility and employers, parents and wider society need to be vigilant if they are to safeguard children. The NSPCC is clear that robust vetting and barring is a necessary, but not sufficient, element of safeguarding. A wide range of processes, practices, attitudes and understanding are all important. Vetting must complement and not be a substitute for robust child protection measures.

For employers or voluntary organisations

5.3. Vetting in itself is only one part of safe recruitment practice and good child protection practice. The Vetting and Barring Scheme must be accompanied by other organisational and cultural improvements to keep children safe, for example organisations should have a child protection policy or code of conduct. Parents should have the information and support they need to make sure the activities their children engage in are safe. The case of Vanessa George in Plymouth shows the importance of employers having, and properly implementing, child protection processes and procedures.

5.4. In 2006 we suggested the need for kite-marking and accreditation schemes to complement regulation, particularly for the voluntary and community sectors. We highlighted the potential of Article 18 of the Protection of Children and Vulnerable Adults (NI) Order 2003 in the then Northern Ireland legislation as a concept that could potentially assist, particularly in voluntary organisations, in making whole-system improvements and, as part of this, help to build capacity. We recommend the Government revisit this idea as it has the potential for organisations to build capacity and good practice in relation to standards which go beyond just vetting.

Parents

5.5. Parents should be given the information and support they need to make informed decisions about keeping their children safe. The NSPCC has published two public education documents, *Have fun be safe* and *Out Alone*, which contain many useful suggestions and messages.

5.6 *Have fun be safe* helps parents and carers to be confident that an organisation has made thorough arrangements to safeguard their children. It encourages them to take an interest in the organisations their children attend and to ask a number of questions which focus on:

- Recruitment processes, such as interviews and references;
- Ensuring organisations have a written code of behaviour for staff;
- The management arrangements for staff and volunteers;
- A child protection policy;
- How children and their parents voice concerns in organisations; and
- Internet safety arrangements.

5.7. *Out Alone* has a range of information and advice for parents, including help with keeping their children safe when they are taking part in organised activities.

5.8 There are a number of key messages which Government should communicate at every opportunity, to assist understanding of: the role of vetting and barring, the need for other measures, and the role parents themselves play in keeping children safe.

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