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To whom it may concern

## Re: Vetting and Barring Scheme Review

The Northern Ireland Commissioner for Children and Young People welcomes the opportunity to respond to this consultation.

However, as noted in our correspondence with the Review Team we are concerned that the short timescale for consultation and the lack of opportunity to engage in meetings outside of the London area will negatively impact on the review process. This is of particular concern given the significance of the decision to review all aspects of the scheme, including considering what, if any, scheme is needed. Due to time constraints, this submission highlights only a number of key points.

It is of critical importance that all aspects of the legislative and policy framework to protect children and young people from abuse operate to the highest standards. Developing safeguards where individuals will have access to positions of trust with children whom they may seek to abuse is a key element of this. Approaches to vetting and barring must be evidence based and proportionate while ensuring lessons are learned from previous gaps and failings. This last point was, of course, a driving force for the development of the Vetting and Barring Scheme (VBS) following the Richard Inquiry.

Moves to improve vetting arrangements in recent years are to be welcomed and the development of a unified vetting and barring system which operates in a straightforward and transparent manner must remain a government focus in safeguarding children. In progressing to a 'live' scheme which provides ongoing monitoring of the status of individuals and enables registration to be mobile, the VBS offers further opportunities for strengthening vetting arrangements. We also welcome a



single agency and decision making body being responsible for vetting and barring arrangements.

It is important to note that vetting arrangements, including any interim arrangements, must apply equally across all jurisdictions. As Northern Ireland has a land border with another European jurisdiction we are particularly keen that further progress is made in arrangements to track and monitor the movement of offenders both across and within UK borders.


In addition to this, we draw attention to the need for the scheme to apply across individuals in positions of trust whether they are employees, volunteers or self employed. We are also of the view that the use of the categories of regulated and controlled activity should be revised to one category. Decisions on placing roles within this category must be based on an assessed risk of the role allowing individuals to develop relationships of trust with children who may then be abused.

The debate which took place during the announcement of the VBS has highlighted the need for public discussion about vetting to be well informed and that government must play an active role in raising awareness about the purpose and scope of vetting and barring arrangements. Throughout the current review of the VBS any debate must ensure a clear focus is maintained on the protection of children and young people and the outcome of this review must not dilute or fragment the levels of protection afforded to them.

We have enclosed our November 2009 submission to Roger Singleton and our 2007 report which reviewed progress made against recommendations of earlier research on vetting and barring.

Please do not hesitate to contact me if you would like any further information.

Yours faithfully,



Alex Tennant  
Head of Policy and Research

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