

# Together we can.

A manifesto for a  
safer society for all



If you have any questions about our Manifesto or would like to work with us to endorse any of our recommendations, please contact us.

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Our newly revised and updated Manifesto sets out Thirtyone:eight's areas of interest and activity in relation to legislative and policy change across the UK. We've developed our recommendations by drawing on published evidence and our own research to inform our calls for action.

### About Thirtyone:eight

Thirtyone:eight is the UK's leading independent Christian safeguarding charity. We help individuals, organisations, charities, faith and community groups to protect vulnerable people from harm and abuse. We work with a network of thousands of organisations across the UK and internationally helping them to create safer places. We are leading experts in safeguarding, working with governments to inform legislation and promote high standards in safeguarding practice.

### Our Manifesto Development Team

Katy Jackson (Public Policy and Advocacy Manager)

Justin Humphreys (Chief Executive)

Peter Wright (Head of Strategic Communications)

**With thanks to all our staff, Trustees, and partners who contributed to the development of this Manifesto.**

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# Together we can create a safer society.



**Justin Humphreys**  
Thirtyone:eight's Chief Executive

**For nearly half a century Thirtyone:eight has been at the forefront of safeguarding and child protection in the UK working as a trusted champion for the rights of all children, young people and adults at risk of harm.**

The charity's formation in the early 1970's coincided with significant legislative reform to the child protection systems in the UK which sought to put children's welfare at the heart of how we care for the most vulnerable in our society.

Since those early days we've witnessed the development, evolution, and more recently the devolution of the legislative landscape surrounding safeguarding, driven in part by learning from past mistakes, and changes in international law and human rights. That process continues to this day.

In working shoulder-to-shoulder with over 10,000 grassroots organisations from the faith and charity sector across the UK to implement good safeguarding practice, we see the real-life impact legislation has on the ground for those delivering activities, care and support for children, young people, and adults.

In partnership with academic bodies, legislators, policy-makers and other like-minded organisations we've been hard at work to understand the risks that remain and the areas where improvement or development in legislation could help support the creation of safer places across all settings.

Despite the many challenges, the opportunity remains for us to develop laws and guidance which continue to support and enhance the hard-won protections already in place, to reform and strengthen existing legislation, and to break new ground in areas where there is still a lack of clear and effective policy and guidance.

In our ongoing work across the UK parliaments in Scotland, Northern Ireland, Wales and England to advocate and engage governments and parliamentarians we've already seen significant success. We know it works.

As a charity, our vision is of a world where every child and adult can feel, and be, safe. Can we make significant and tangible steps toward seeing that vision become a reality in our lifetime? **We believe that together we can.**

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Thank you for reading our manifesto. We look forward to engaging with parliamentarians, lawmakers, and like-minded organisations and individuals as we work together to make the most of the opportunities we have identified and outlined in this manifesto.

**Together we can make our society a place where every child and adult can feel, and be, safe.**

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# Wales

## The context

Wales is home to over 600,000 children and young people, along with 2.4 million adults. It is unique in the safeguarding context as the legislation and practice that underpins how people are kept safe, applies to both children and adults. It is the only UK jurisdiction where this happens. The Welsh government has also committed to implementing the six recommendations from the Independent Inquiry into Child Sexual Abuse (2022)<sup>8</sup> that relate specifically to Wales. Key pieces of legislation that have transformed the Welsh safeguarding landscape over the last decade include the Social Services and Well-being (Wales) Act 2014 and Working Together to Safeguard people. Wales has also led the way amongst the four UK nations in including the United Nations Convention on the Right of the Child (UNCRC) into its legislation.

**Together we can create  
a safer Wales.**



## What we're asking for

# Strengthen the safeguards

An opportunity exists to tighten the safeguards that are already in place to protect children, young people, and adults at risk of harm. We are asking for the Welsh government to improve the level of protection available for vulnerable people by reviewing and updating existing legislation.

- 1 Review the **definition of regulated activity**.
- 2 Introduce a **statutory definition of grooming**.
- 3 Widen the scope of existing **Position of Trust legislation**.

## Regulated activity definition

### The opportunity:

The regulated activity definition underpins key decisions such as DBS eligibility, duty to refer to DBS, positions of trust legislation and proposed mandatory reporting. The current definition leaves loopholes in the faith and sports sectors. Clarifying and expanding the definition will ensure comprehensive safeguarding across all contexts, and help educate groups about their responsibilities.

### The challenge:

Significant gaps exist in the current definition of regulated activity within faith communities. Current loopholes mean many volunteers and workers who have unsupervised access to children are not subject to enhanced DBS checks due to the frequency of their role, increasing the risk of harm.

The irregularity and informality of many faith settings mean they are not consistently classified as regulated activity. Faith leaders and other trusted figures may not be properly vetted, leading to misplaced trust.

### Our recommendation:

- ▶ **A review of the definition of regulated activity to ensure that all relevant roles in faith communities are covered and the frequency element is removed so the definition is based on the nature of contact rather than supervision.**

# Grooming

## The opportunity:

Criminalising grooming offers a much greater level of protection to vulnerable people from those intending to groom. When a person grooms a child or adult, intervention is needed so charges may be brought, and the victim protected from further harm.

## The challenge:

Despite current laws in Wales that recognize grooming behaviours, the law fails to comprehensively address the problem of online grooming, focussing on the intention to meet a child following grooming, rather than criminalising the preceding grooming behaviour.

## Our recommendations:

- **Introduce a full statutory definition of Grooming with accompanying guidance.**
- **Measures and provision for the online element of grooming to be specifically added to legislation.**
- **Provision under legislation to be extended for young people aged between 16-18.**
- **An offense to be created which focuses on the preceding grooming behaviour.**

# Positions of Trust

## The opportunity:

Children and young people receive care or support services from adults in a variety of settings. These adults are in a unique and important relationship with the children they interact with. Existing Positions of Trust legislation gives children and young people a level of protection by acting as a powerful deterrent and holding these adults accountable if they exploit their position towards a child to sexually abuse them. For this to be effective it needs to apply to any role that holds a similar level of trust and responsibility across all sectors and settings.

## The challenge:

The existing scope of Abuse of Positions of Trust legislation in England and Wales, despite being extended in 2022 to include faith organisations and community groups, still creates gaps around other similar settings where children engage with adults regularly including non-religious community groups such as Scouts, which creates inequality and leaves young people without statutory protection across similar settings.

## Our recommendations:

- **Update Abuse of Positions of Trust legislation to apply to all environments where young people aged 16 and 17 engage with adults in roles that are responsible for caring for, training, supervising or being in sole charge of them.**
- **Supplement the current list of potential settings and roles by making the purpose, nature and context of the relationship between the adult and child the factor which brings a role under the scope of law.**
- **Bring greater parity between Positions of Trust and Regulated Activity through amending the respective definitions and removing the 'frequency', 'intensity' and 'supervision' requirements**



## What we're asking for

# Better protect victims and survivors

Significant opportunities exist to better protect victims and survivors of abuse in Wales through the development of new legislation:

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Introduce a **mandatory reporting** legislation.

## Mandatory reporting

### The opportunity:

Reporting abuse when it happens should be an absolute obligation with no exceptions. Making failure to report child sexual abuse a criminal offence gives greater protection to children and young people who report any concerns or disclose abuse. Evidence from other countries who already have mandatory reporting laws in place show it works.

### The challenge:

Mandatory reporting is a recommendation of the Independent Inquiry into Child Sexual Abuse (2022)<sup>8</sup> that the Welsh government have accepted in principle with a view to under take further consultations on whether to implement a mandatory reporting duty.

### Our recommendations:

► Implement a mandatory reporting duty as recommended by the Independent Inquiry into Child Sexual Abuse (2022)<sup>8</sup> which includes criminal sanctions, legitimate suspicions of abuse, and applies to those in regulated activity and positions of trust.







## What we're asking for

# Create safer environments

Significant opportunities exist within Wales to develop new legislation that support the creation of safer environments for all by reducing the risks posed to children and young people from sexual abuse:

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Implement the recommendations from the **Independent Inquiry into Child Sexual Abuse (2022)**<sup>8</sup>.

## IICSA (2022) Recommendations

### The opportunity:

Children have the right to be protected from all forms of harm and abuse, including Child Sexual Abuse. The report of the Independent Inquiry into Child Sexual Abuse (2022)<sup>8</sup> published in October 2022 included 20 concluding recommendations about a range of issues including Mandatory Reporting, Redress for victims and survivors, a Cabinet Minister for Children, the introduction of new Child Protection Authorities for England and Wales with investigative powers, and significant changes to the Disclosure and Barring Service.

### The challenge:

Of the 20 recommendations in the IICSA report<sup>8</sup>, six were directed at the Welsh Government. Four of the recommendations were accepted, with the remaining two accepted in principle. In most of these, the Welsh government is already making progress, however ongoing work is required to ensure momentum is maintained to bring about the full implementation of all the recommendations.

### Our recommendations:

- **Make sustained progress toward implementing all six of the IICSA (2022) recommendations.**





# Speak out on behalf of the voiceless, and for the rights of all who are vulnerable

Proverbs 31:8 (CEB)

If you have any questions about  
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recommendations, please contact us.

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