

In scrutinising this Bill please consider the following points:

Failure to provide for Safe Access to facilities which operate within the law is a breach of Human Rights requirements.

Everyone accessing or attempting to access medical care and advice of any kind should be free to do so in a safe setting including any buildings, outside spaces, accesses including access routes from public transport and parking areas. Staff should also be free from harassment, abuse and obstruction in their course of employment.

Areas outside health facilities be they public, private or charitable are not an appropriate forum for protests. Gatherings of people, approaches to facility users, use of offensive language and display of offensive materials should not be permitted in such areas. Many if not all users will be vulnerable people. Most will be young women. The majority of staff will also be female.

The Rights to Free Speech and Assembly should be upheld but must be balanced with the rights of others to be free from intimidation, harassment and defamation.

Current Harassment laws are not adequate to ensure safe access zones at health care facilities. The legal threshold of at least two incidents of harassment may be sufficient where A is harassing B but where A, G, R, E, S, O and R are each harassing V, I, C, T, I and M in turn. Fining of individuals may not be sufficient and organisations and individuals which organise and incite such behaviour should be severe.