

FAO: Rt Hon Dominic Raab
Lord Chancellor and Secretary of State for Justice

Ministry of Justice
102 Petty France
London
SW1H 9AJ
United Kingdom

Dear Justice Secretary,

Pre-Legislative Scrutiny of a ‘Bill of Rights’

We write as more than 150 civil society organisations and leaders to share our urgent concern about the Government’s statement of 9 June 2022 that it does not intend to submit its Bill of Rights for pre-legislative scrutiny.

As highlighted by the Joint Committee on Human Rights, Justice Committee, Lords Constitution Committee, and Public Administration and Constitutional Affairs Committee, the proposals set out in the Bill of Rights are of “supreme constitutional significance and have the potential to impact on the rights of individuals for many years to come.” Ministers of the devolved nations have highlighted how the Government’s proposals to replace the Human Rights Act threaten to undermine the devolution settlement.

It is therefore highly disappointing and worrying that the Government has rejected calls from Parliamentary Committees representing both Houses and all major parties to ensure that these measures are subject to the fullest amount of public and parliamentary scrutiny.

Pre-legislative scrutiny of these plans is made ever more important by the divergence between the proposals and the findings of the independent panel established by the Government to review the operation of the Human Rights Act. The panel, chaired by retired Court of Appeal judge Sir Peter Gross, found that the HRA is operating effectively to preserve parliamentary sovereignty and protect individuals’ rights. The Government’s subsequent proposals ignored these findings and pushed vastly beyond the panel’s scope to a position that would be a vast and deeply consequential overhaul of human rights protection in this country.

Proposed legislation of such constitutional importance and with potentially vast-ranging impact on the rights of individuals and their ability to defend those rights requires careful and robust consideration, which can only be achieved if elected members of Parliament and peers in the House of Lords are given the time and space to fully consider its implications.

We urge the Government to respect the principles of our parliamentary democracy and subject the proposed Bill of Rights to the pre-legislative scrutiny it clearly requires.

Yours sincerely,

1. Martha Spurrier, Director, Liberty
2. Kevin Hanratty, Director, Human Rights Consortium
3. Isobel Ingham-Barrow, CEO, Community Policy Forum
4. Mia Hasenson-Gross, Director, René Cassin
5. Svetlana Kotova, Director of Campaigns & Justice, Inclusion London
6. Helen Moulinos, Chief Executive, POhWER

7. Silkie Carlo, Director, Big Brother Watch
8. Naomi Smith, CEO, Best for Britain
9. Paddy Kelly, Director, Children's Law Centre
10. Annie Viswanathan, Director, Bail for Immigration Detainees
11. Dr. Daniel Ehighalua, Legal and Advocacy Director, Rights and Security International, UK.
12. Estelle du Boulay, Director, Rights of Women
13. Louise King, Director, Children's Rights Alliance for England
14. Phil Booth and Sam Smith, Coordinators, medConfidential
15. Harriet Wistrich, Director, Centre for Women's Justice
16. Carolyne Willow, Director, Article 39
17. Gisela Valle, Director, Latin American Women's Rights Service
18. Andrea Simon, Director, The End Violence Against Women Coalition
19. Nicole Francis, Chief Executive, ILPA
20. Barbora Bukovská, Senior Director for Law and Policy, ARTICLE 19
21. Fiona Rutherford, Chief Executive, JUSTICE
22. Dave Timms, Head of Political Affairs, Friends of the Earth (England, Wales and Northern Ireland)
23. Jess McQuail, Director, Just Fair
24. Sacha Deshmukh, Chief Executive, Amnesty International UK
25. Mhairi Snowden, Director, Human Rights Consortium Scotland
26. Marguerite Hunter Blair, CEO, Play Scotland
27. Ailsa MacKenzie, Chief Officer, The Pyramid at Anderston
28. Kat Lorenz, Director, Asylum Support Appeals Project
29. John Cairns Campaign Coordinator Scottish CND
30. Agnes Tolmie chair of The Scottish Women's Convention
31. Mark Hazelwood, CEO, Scottish Partnership for Palliative Care
32. Steve Crawshaw, Policy and Advocacy Director, Freedom from Torture
33. Asma Abdalla, CEO, Empower Women for Change
34. Nazek Ramadan, Director, Migrant Voice
35. Tom Brake, Director, Unlock Democracy
36. Margaret Simpson MBE MSC FRSA Director/CEO
37. Shivali Fifield, Chief Officer, Environmental Rights Centre for Scotland
38. Barry Gale, Leader, Mental Health Rights Scotland
39. Clare MacGillivray, Director, Making Rights Real
40. Dr Donald Macaskill, Chief Executive, Scottish Care
41. Fraser Sutherland, Chief Executive, Humanist Society Scotland
42. Glasgow Council for the Voluntary Sector
43. Lucila Granada, CEO, Focus on Labour Exploitation (FLEX)
44. Alison Douglas, Chief Executive, Alcohol Focus Scotland
45. Steve Crawshaw, Policy and Advocacy Director, Freedom from Torture
46. Tim Naor Hilton, CEO, Refugee Action
47. Moira Tasker, CEO Inclusion Scotland
48. Brian Gormally, Director, Committee on the Administration of Justice
49. Tim Hopkins, Director, Equality Network
50. Maggie Lennon, Director, Bridges Programmes
51. Sara Redmond, Chief Officer of Development, Health and Social Care Alliance Scotland
52. Robert Rae, Director, Art27 Scotland
53. Sanchita Hosali, CEO, The British Institute of Human Rights
54. Dr Sarah Wishart, Creative Director, EachOther
55. Sandra Stephens, Lead Advocacy Worker, Advocacy Western Isles
56. Maureen Martin CEO Edinburgh Development Group

57. Pippa Goodfellow, Chief Executive, Alliance for Youth Justice
58. Robert Moore, Secretary North Wales Regional Equality Network
59. Alastair Hudson - CEO HIV Scotland
60. Jardine Simpson, Chief Executive, Scottish Recovery Consortium
61. Suzanne Swinton, CEO, Scottish Independent Advocacy Alliance
62. Chris Jones, Director, Statewatch
63. Very Rev Dr Susan Brown, Convener - Faith Impact Forum, the Church of Scotland
64. Kathy Evans, CEO, Children England
65. Sara Ogilve, Director Policy, Rights and Advocacy, Child Poverty Action Group
66. Louise Willson, Deputy Chief Executive, Outside the Box
67. Deborah Coles, Executive Director, INQUEST
68. Anna Ritchie Allan, Executive Director, Close the Gap
69. Jen Persson, Director, defend digital me
70. Mark Lee, Chief Executive, Together Trust
71. Ruth Marks, Chief Executive, Wales Council for Voluntary Action
72. Azmina Siddique, Policy and Impact Manager, The Children's Society
73. Louise Hunter, CEO, Who Cares? Scotland
74. Andrew Copson, Chief Executive, Humanists UK
75. Shoaib M Khan, Human Rights Lawyer
76. Siobhán Hyland, Chair, Northamptonshire Rights and Equality Council
77. Phyllida Swift, CEO, Face Equality International
78. Sarah Mistry, CEO, British Geriatrics Society
79. Veronica Gray, Deputy CEO, Hourglass (Safer Ageing)
80. Amy Gibbs, CEO, Birthrights
81. Khatuna Tsintsadze, Co-Director, Zahid Mubarek Trust
82. Sarah Vibert, Chief Executive, National Council for Voluntary Organisations
83. Lynne Turnbull, Chief Executive Officer, Disability Positive
84. Cathy Anne Dunn, Manager, Advocacy Western Isles
85. Dr Judith Turbyne, Chief Executive, Children in Scotland
86. Danielle Roberts, Senior Policy Development Officer, Here NI
87. Yasmin Rehman, CEO, Juno Women's Aid
88. Juliet Harris, Director, Together (Scottish Alliance for Children's Rights)
89. Audrey Ludwig, Director of Legal Services, Suffolk Law Centre
90. Annette Lawson, Chair, the Judith Trust
91. Joe Powell, Chief Executive, All Wales People First
92. Jonathan Senker, Chief Executive, VoiceAbility
93. Julie Bishop, Director Law Centres Network
94. Polly Neate, Chief Executive, Shelter
95. Kadra Abdinasir, Strategic Lead, Children and Young People's Mental Health Coalition
96. Justine Forster, CEO, Advocacy Focus
97. Chris Minnoch, CEO, Legal Aid Practitioners Group
98. Bryan Michell, CEO, My Life My Choice
99. Kari Gerstheimer, Chief Executive, Access Social Care
100. Karen Parry, Chief Executive Officer
101. Joyce Kallevik, Director, Wish
102. Pauline Lunn, Director, In Control Scotland
103. Recording Clerk (CEO), Quakers in Britain
104. Lubia Begum-Rob, Director, Prisoner's Advice Service
105. Karen Chandler, Chief Officer, Pembrokeshire People First
106. Annemarie McClure, CEO Start360 N. IRELAND
107. Kerry Smith, CEO, Helen Bamber Foundation and Asylum Aid

108. Norman L. Reimer, Global CEO, Fair Trials
109. Rhian Davies, Chief Executive, Disability Wales
110. Katharine Sacks-Jones, CEO, Become
111. Tracey Lazard, CEO, Inclusion London
112. Halima Begum, CEO, Runnymede Trust
113. Tressa Burke, Chief Executive Officer, Glasgow Disability Alliance
114. Heléna Herklots CBE, Older People's Commissioner for Wales
115. Sophie Corlett, Director of External Relations, Mind
116. Maggie Lennon, National Committee Member, Women for Independence -
Independence for Women
117. Aisling Playford, The Rainbow Project, Northern Ireland
118. Ewan Roberts, CEO, Asylum Link Merseyside
119. Deborah Gold, Chief Executive, National AIDS Trust
120. Ruth Smeeth, CEO, Index on Censorship
121. Christy Taylor, Chief Executive, Caerphilly People First
122. Frances Lynne Evans, Director, RCT People First
123. Simon Starling, Director of Policy, Advocacy and Research, Bond
124. Jatin Haria, Executive Director, Coalition for Racial Equality and Rights (Scotland)
125. Christina McAnea, General Secretary, UNISON: The Public Service Union
126. Mark Day, Head of Policy and Communications, Prison Reform Trust
127. Samantha Clark, CEO, Learning Disability England
128. Yasmine Ahmed, UK Director, Human Rights Watch
129. Ben Leather, Director, Peace Brigades International UK Section
130. Meghan Campbell, Deputy-Director of the Oxford Human Rights Hub
131. Andy Elvin, CEO, TACT
132. Helen Wildbore, Director, Relatives & Residents Association
133. Beth Cadger, National Co-Coordinator, Article 12 in Scotland
134. David Mackie, Convenor, Howard League Scotland
135. Maureen O'Neill, Director Faith in Older People
136. Colin Lee, Chief Executive, CEMVO Scotland
137. Clare Moody, Co-CEO, Equally Ours
138. Murray Hunt, Director, Bingham Centre for the Rule of Law
139. Dr Mhairi Crawford, CEO, LGBT Youth Scotland
140. Catherine Tuitt MBE, Trustee, Tower Hamlets Law Centre
141. Rocio Cifuentes MBE, Children's Commissioner for Wales
142. Bruce Adamson, Children and Young People's Commissioner Scotland
143. Koulla Yiasouma, Northern Ireland Commissioner for Children and Young People
144. Jo Hickman, Director, Public Law Project
145. Baroness Helena Kennedy, Director, IBA's Human Rights Institute
146. Emma Norton, Director, Centre for Military Justice
147. Patricia Durr, CEO, ECPAT UK
148. Ian Williams, Dates-n-Mates Scotland
149. Emily Bolton, Director, APPEAL
150. Frances O'Grady, General Secretary, Trades Union Congress
151. Sarah Mann, Director, Friends, Families and Travellers
152. Lui Asquith, Director, Mermaids
153. Daniel Gorman, Director, English PEN
154. Melanie Carter, Chair Steering Committee, Public Law Solicitors Association
155. Ben Leather, Director, Peace Brigades International (PBI) UK
156. James Wilson, Deputy Director, Detention Action