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NORTHERN IRELAND COUNCIL FOR ETHNIC MINORITIES

&

BELFAST MIGRANT CENTRE

Response to All-Party Parliamentary Group on Migration Family Migration Inquiry

January 2013

About Us

The Northern Ireland Council for Ethnic Minorities (NICEM) is an independent non-governmental organisation. As an umbrella organisation[1] we represent the views and interests of black and minority ethnic (BME) communities.[2] Our mission is to work to bring about social change through partnership and alliance building, and to achieve equality of outcome and full participation in society. Our vision is of a society in which equality and diversity are respected, valued and embraced, that is free from all forms of racism, sectarianism, discrimination and social exclusion, and where human rights are guaranteed.

The Belfast Migrant Centre provides a one-stop shop service with bi-lingual staff to eliminate language barriers. It provides help to those in need by providing outreach services and responding to the needs of victims of racial harassment and those in crisis situations as well as immigration advice. The overall aim is to tackle racism and eliminate barriers against new and settled migrant communities in NI.

Summary of Key Points

- The new income requirement is forcing families to live separately without certainty as to reunification in the future and the inflexibility of the rules can result in illogical conclusions.
- The new minimum income requirement has been set arbitrarily and without regard to relevant factors such as the varying income levels across the UK. It has the impact of discriminating against disadvantaged groups such as low-earners and women.
- The social consequence of the changes to the rules mean that families are being split up because children are being forced to live with one parent whilst the family work out how to navigate the rules in order to be able to stay together.
- Another economic consideration is that third party financial support is prohibited under the new financial rules, which was previously permitted, and this impacts particularly on British / settled persons who are studying.
- One of the practical implications of the new rules, is that they are extremely complex and long-winded and application forms do not assist in ensuring that applicants are aware of all of the requirements, which creates confusion, uncertainty and frustration.
- The category of adult dependent relatives makes up a small proportion of migrants to the UK, and consequently, it is submitted that the stringent new criteria are a disproportionate interference with family life.
- The new rules obstruct families who are able to financially support themselves from being together and rather than promoting, in fact serve to hinder integration.
- The UK immigration system should recognise the value of family life, as well as the individual nature of varying circumstances of different families in the UK.

[1] Currently we have 27 affiliated BME groups as full members. This composition is representative of the majority of BME communities in Northern Ireland. Many of these organisations operate on an entirely voluntary basis.

[2] In this document "Black and Minority Ethnic Communities" or "Minority Ethnic Groups" or "Ethnic Minority" has an inclusive meaning to unite all minority communities. It refers to settled ethnic minorities (including Travellers, Roma and Gypsy), settled religious minorities, migrants (EU and non-EU), asylum seekers and refugees and people of other immigration status.

1. Introduction

1.1 NICEM and the Belfast Migrant Centre welcome the opportunity to respond to this important inquiry on the new family migration rules, which have wide-reaching implications for our clients and the communities we represent. The changes in immigration rules relating to family migration of 9 July 2012 form part of the government's strategy to "take net migration back to the levels of the 1990s - tens of thousands a year, not hundreds of thousands", by 2015.[3] The government intended to codify Article 8 of the European Convention on Human Rights, the right to a family and private life, in the revised family immigration rules. However, within three months of the revised rules coming into force, the Upper Tribunal in *MF (Article 8 – new rules) Nigeria*[4] ruled that, "as a result of these changes the rules are longer and incorporate some of the vocabulary of Article 8 makes no difference".

1.2 Nonetheless, given the government's stated intention to codify Article 8 within the rules, it is therefore within the context of the right to a family life that these new rules must be considered. It is our submission that the rules, with their arbitrary and prescriptive requirements, serve to undermine the concept of family life. Blanket and inflexible rules such as the minimum income requirement are keeping families apart, delaying family reunion, and causing significant stress and anxiety to spouses, partners and children.

1.3 The extensive evidential requirements in Appendix FM-SE, and the complexity of the new rules, in particular the minimum income requirement, make it even more difficult for applicants, as well as immigration practitioners, to understand exactly what is required, and provide evidence that they meet the requirements. The rules are poorly drafted. They require an applicant to refer backwards and forwards between various subsections within Appendix FM and Appendix FM-SE, in order to understand the rule and how to evidence that they meet the rule, creating confusion and uncertainty.

1.4 As a consequence of the new rules, many British citizens and permanent residents who are able to support themselves and their dependents without recourse to public funds are unable to sponsor their family members to live with them in the UK.

2. New minimum income requirement to sponsor non-EEA spouses/partners

What does the available evidence suggest have been the impacts of the new minimum income requirement on potential sponsors and/or applicants since July 2012?

2.1. The result of the new income requirement is that families are being forced to live separately, with uncertainty over whether or not they will be reunited. This includes families

[3] Invitation to Join the Government of Britain, The Conservative Manifesto 2010, and Damien Green MP, House of Commons, Hansard, 12 December 2011: Col 513.
[4] UKUT 00393 (IAC).

with children. British citizens and permanent residents married to non-EEA nationals are being forced to decide with which parent their British child should live. This is in breach of section 55 of the Borders, Citizenship and Immigration Act 2009, which places a statutory duty on the Secretary of State to promote and safeguard the welfare of children in the UK.

2.2. The inflexibility of the rules results in illogical conclusions, at the expense of family unity. For example:

a) The requirement to have held the minimum income for 12 months means that families are forced to live separately merely in order for the UK spouse to clock up their 12 months. For example, a PhD graduate who was earning a low salary whilst studying, and has recently started a job at which he or she is earning above the minimum income, will need to wait until they have been in that job for a year before their spouse can apply to join them in the UK. Third party financial support from family members is not permitted.

b) A person is working reduced hours so as to care for an ill or disabled family member. As a consequence they earn less than £18,600 per year. Claiming Carer's Allowance of £58.45 would enable them to be exempt from the minimum income requirement under Section E-ECP.3.3 of Appendix FM. However, they are not eligible for Carer's Allowance as they are earning over £100 per week.[5] Whilst they may have sufficient savings to support their spouse, only savings in excess of £16,000 are counted. Consequently, in order to be able to sponsor their spouse, they would need to give up their job, and claim Carer's Allowance, resulting in a greater burden on the taxpayer.

c) The foreign income of the non-EEA spouse is not taken into account, nor is their earning potential in the UK. A UK citizen living abroad with their high-earning spouse may not even have the right to work whilst abroad. They are unable to move back to the UK without securing a job themselves that earns more than £18,600, despite their spouse's potential to earn significantly more.

Case Study from the Belfast Migrant Centre

2.3. Client M, originally from Syria, naturalised as a British citizen over 20 years ago, and lives in Belfast. He has always worked in the UK and has never claimed benefits. He owns his own house, and is able to comfortably provide for himself and his family. In 2010 he married a Syrian national, B. At the time, his wife was unsure whether she wanted to move to the UK or not. B had a good job working at a university in Damascus. The couple decided not to apply for a spouse visa, as at the time, B did not have the intention to settle in the UK permanently (although they satisfied all the other requirements of the immigration rule at the time, including the financial requirements). They applied instead for a visit visa, to enable B to come to the UK and decide together whether to make their future home here. Their application

[5] https://www.gov.uk/carers-allowance/eligibility

was initially refused and the couple had to wait nine months for the appeal to be listed in the First Tier Tribunal in Belfast. At the hearing, the appeal was allowed immediately, with the Immigration Judge criticising the poor quality of the initial decision of the Entry Clearance Officer and the lack of an adequate review by the Entry Clearance Manager.

2.4. Whilst B was visiting the UK in 2011, she fell pregnant. Fully aware that the immigration rules did not permit her to apply for a spouse visa from within the UK, B returned to Syria before her visit visa expired, and gave birth to their baby there. The baby is a British Citizen. B now wants to apply for a spouse visa to live with her husband M and bring up their British child in the UK. However, M is earning just under the £18,600 required under the new rules. Whilst the couple have savings, these are less than £16,000 and therefore cannot be included in the financial assessment. B's education, employment experience and potential income in the UK are not considered.

2.5. The family are currently split, with B and the baby living in dangerous and unpredictable conditions in Syria. M is living in the UK and is unable to visit his family in Syria. He cannot take more time off from work or he will be in danger of losing his job. The family is under considerable stress at being separated, with uncertain prospects of being able to live together in the UK.

2.6. If B applies for a spouse visa, it will be refused on the basis that the inflexible income requirement is not met. The immigration rules purport to reflect Article 8 ECHR, and the particular circumstances of her application will not be considered by the Entry Clearance Officer. In addition to paying the £826 for the application, she will need to pay a further £140 to appeal the decision, in addition to legal fees, and will have to wait a further 6-9 months for the appeal to be listed in the Tribunal in Belfast.

2.7. An immigration judge should consider her application under the 'real' Article 8 - as determined by the Upper Tribunal in *MF (Article 8 – new rules) Nigeria*[6] - and may decide that refusal of a spouse visa is a disproportionate interference with family life. However, under the immigration rules, her appeal will be refused. The consequences of being refused under the immigration rules with her appeal allowed under Article 8 ECHR, means that she will be granted leave on a 10 year route to settlement, rather than 5 years. This will require her to pay for a total of five applications before she can settle in the UK (one entry clearance application, three extension applications and one settlement application). Based on current application fees this would be a minimum total of £3,500 (however, application fees rise every year).

2.8. This case study is an example of a genuine family who are suffering as a consequence of the new financial requirement, which does not take into account the lower salaries and living costs in Northern Ireland, the family's ability to financially support themselves without

[6] [2012] UKUT 00393 (IAC).

recourse to public funds, the couple's history of abiding by the UK immigration rules, the right of the British child to live safely and securely in the UK with both parents, and the right to respect for family life of all concerned. Since the rules have changed, it is a typical example of how families are affected.

Does available evidence suggest that the new minimum income requirement for sponsoring non-EEA spouses and partners to come to the UK has been set at the right level? Please provide support for your view.

2.9. It is our submission that the new minimum income requirement of £18,600 has been set arbitrarily and without regard to relevant factors including: the varying income levels across the UK; the variation in salaries and cost of living across the UK; the typically lower income levels of women; and lower incomes of migrants, and of certain ethnic groups. As a consequence the minimum income requirement is discriminatory.

2.10. In July 2012 the £18,600 minimum annual income requirement replaced the former maintenance rule, which required a family to have sufficient funds to maintain and accommodate themselves and their dependants without recourse to public funds (*KA and Others (Adequacy of maintenance) Pakistan*[7]). The previous rule ensured that family members of British nationals/permanent residents would have sufficient finances so as not to place a burden on the UK's welfare system. Notwithstanding, spouses/partners are not entitled to benefits such as job-seekers allowance or housing benefits during the probationary period anyway. After providing accommodation, the minimum amount a sponsor needed to have is the equivalent to what he or she would be entitled to if in receipt of state benefits for themselves and their dependants.

2.11. The current income support level for a couple over the age of 18 is £111.45 per week, which amounts to £5,795.40 per year.[8] Applicants under the old rule would have to demonstrate that their income or savings were sufficient to pay for accommodation, with an additional £5,795.40 per year.

2.12. The national minimum wage is £6.19 per hour, amounting to an annual income of £12,875.20.[9] The Living Wage, calculated at £7.45 per hour, for people living across the UK outside of London, amounts to an annual income of £15,496. The London Living Wage, £8.55 per hour, amounts to £17,784 per year.[10]

2.13. All of the annual income rates detailed above are less than the new income requirement for migrants to sponsor their family members to live with them in the UK. Indeed, for people living in Northern Ireland, where salaries and living costs are lower than in other parts of the

[7] [2006] UKAIT 00065.
[8] https://www.gov.uk/income-support/what-youll-get *Accessed on 29 January 2013.*
[9] https://www.gov.uk/national-minimum-wage-rates *Accessed on 29 January 2013.*
[10] Northern Ireland Assembly Research Service, *The Living Wage,* January 2013, available at http://www.niassembly.gov.uk/Documents/RaISe/Publications/2013/employment_learning/1513.pdf *Accessed on 29 January 2013.*

UK, to sponsor their spouse or partner, under the new rules, they need to be earning £6,000 more than minimum wage.

2.14. The new financial rule does not reflect the varying incomes of people in different parts of the UK. Research conducted of behalf of KPMG in October 2012 shows that one in five people across the UK earn less than the living wage. As a consequence, at least 20% of the overall population would be unable to live with their non-EEA spouse or partner in the UK, under the new family migration rules. Northern Ireland is the region with the highest proportion of people in the UK (24%) earning below the living wage.[11] The majority of clients seen by the Belfast Migrant Centre are earning less than the £18,600 required to sponsor their non-EEA spouse.

2.15. It is our submission that the new minimum income requirement has little to do with ensuring that migrants are not a burden to the taxpayer, for the following reasons:

a) The previous financial requirement was sufficient to ensure that a sponsor could accommodate and maintain themselves and their dependants without recourse to public funds, as applicants were required to demonstrate that they could provide accommodation and have additional funds equivalent to income support levels to maintain themselves and their dependents.

b) The new minimum income requirement is £6,000 above the national minimum wage. It exceeds both the London living wage, and the UK living wage.

c) The new minimum income requirement exceeds the income of at least 20% of the UK population, meaning that one in five people living in the UK is unable to live in this country with a non-EEA spouse or partner.

d) Non-EEA spouses and partners of British citizens and permanent residents, admitted under both the old family migration rules and the new rules, have no recourse to public funds during their probationary period. This means that under the new rules, for five years, they will not be able to access any form of welfare benefit, and thus, will not be a burden to the taxpayer regardless of the income of their sponsoring spouse.

2.16. It is submitted that the new financial requirement is put in place, rather, to contribute towards the Coalition Government's aims of reducing migration to the tens of thousands by 2015, and that the impact of the new financial requirement is discriminatory:

a) It discriminates against migrants who have settled in the UK or naturalised as British citizens, many of whom are in lower-earning jobs, and who are unable to meet the

[11] *Ibid.*

new financial requirement to sponsor their non-EEA spouse. A briefing paper by the Migration Observatory indicates that the presence of foreign-born workers has grown fastest in relatively low-skilled sectors and occupations (an increase from 8.5% in 2002 to 28.2% in 2011).[12]

b) It discriminates indirectly against women:

   i. Women typically earn less than men whilst working in the same jobs. According to the results from the Northern Ireland Annual Survey of Hours and Earnings 2012 there has been a widening of the gender pay gap. Female median hourly earnings were some 90.3% of male earnings (compared to 91.2% in 2011).[13]

   ii. Women take on disproportionate childcare responsibilities compared to men. British / settled women living abroad who are dependent on their husband's salary whilst caring for children, will be unable to sponsor their husband to live in the UK, as their husband's salary abroad, or earning potential in the UK, is not considered.

   iii. British / settled women wishing to return to the UK to have a baby will not be able to sponsor their husbands unless they have a job offer in the UK. It will be unlikely that they will have a job offer to start within 3 months of return to the UK, if they are pregnant.

c) It discriminates against people living in parts of the UK where salaries are lower, for example in Northern Ireland, which has the lowest average salary in the UK. As a blanket rule, it does not take into account lower living costs in different parts of the country.

d) The prohibition of third party support discriminates against certain ethnic groups whose cultural practices involve receiving financial support from extended family members.

Please provide details of any other economic, social or practical considerations relating to the new minimum income requirement.

2.17. The social consequence of the changes to the rules should not be underestimated. Families are being split apart; children are being forced to live with one parent whilst the

[12] Migration Observatory, *Briefing – Migrants and the UK Labour Market: An Overview,* 28/08/2012, available at: http://www.migrationobservatory.ox.ac.uk/sites/files/migobs/Briefing%20-%20Migrants%20in%20the%20UK%20Labour%20Market_0.pdf. *Accessed on 29 January 2013.*

[13] Northern Ireland Annual Survey of Hours and Earnings 2012, available at: *http://www.detini.gov.uk/ni_ashe_2012_bulletin-revised_22-11-12.pdf Accessed on 29 January 2013.*

family work out how to navigate the rules in order to be able to stay together. The increased probation period for spouses from two to five years causes uncertainty and does not assist the migrant family member's integration into the UK. The requirement to satisfy the minimum income requirement continuously throughout the five year probationary period means that any economic misfortune, redundancy, illness or family crisis could prevent the migrant family member from settling in the UK. This causes added stress to families and does nothing to promote social cohesion.

2.18. Third party financial support, which was previously permitted but is prohibited under the new financial rules, allowed for British / settled persons who were studying (for example a PhD), and financially supported by their parents or other family members, to have their non-EEA spouses or partners living with them in the UK. Once here, the spouse / partner was able to work, contribute towards the family income, and support their British / settled spouse through their academic career. Under the new rules, a British / settled person who wants to live in the UK with their non-EEA spouse, cannot choose to study in this country, unless they have savings of £62,500 to demonstrate that they can support their dependant family member for 2.5 years.[14]

2.19. On a practical note, the new rules are extremely complex and long-winded. Applicants are required to check and cross-reference between various sections and subsections of Appendix FM and Appendix FM-SE of the rules. The section on the evidential requirements is difficult to understand, in particular where applicants partners' are self-employed or where assessing income is not as straightforward as simply looking at the previous 12 months' employment. Missing out an item of evidence in an application leads to disproportionate consequences.

2.20. The application forms do not assist in ensuring that applicants are aware of all of the requirements. This creates confusion, uncertainty and frustration not only for applicants and their families, but also for their legal advisors and UKBA staff. From April 2013 legal aid for immigration applications will no longer be available. It is envisaged that there will be an increase in appeals to the First Tier Tribunal by family members, resulting in greater costs for all parties involved.

3. Rules on sponsorship of non-EEA adult/elderly dependent relatives

What does the available evidence suggest have been the impacts of the new rules affecting elderly dependents on potential sponsors and/or applicants since July 2012?

3.1. The new rules on sponsorship of non-EEA adult dependent relatives are extremely onerous, and the fee, which is currently £1,850, has increased significantly in recent years. Only parents, grandparents, sons, daughters, and siblings over 18 can apply, and applications must be made from abroad, regardless of circumstances (e.g. a family member suddenly

[14] If the non-EEA applicant's partner is not in employment, they must demonstrate that they have savings of £18,600 x 2.5 years, plus £16,000. This amounts to £62,500.

falling severely ill whilst visiting the UK). The applicant must demonstrate that, as a result of age, illness or disability, they require a level of long-term personal care to perform everyday tasks that can only be provided in the UK by their relative here, and without recourse to public funds. They are required to show either that care is not available in their country of origin, or is not affordable.[15] As a consequence of such stringent conditions, from the period between 9 July to 31 October 2012, only one adult dependent visa was issued.[16]

3.2. It is our submission that the new rules interfere with family relationships between British nationals and settled residents, and their elderly parents or relatives, in a disproportionate manner. Many of these relatives are near to the end of their lives. Denying British nationals and residents the opportunity to care for their parents at the end of their lives, denying children the chance to spend valuable time with their grandparents before they die, diminishes the notion of family life. It is an insult to these families to suggest, as the rules do given that they purport to reflect Article 8, that family life is respected where it is possible to pay someone abroad to provide personal care on a daily basis for your infirm or dying relative rather than care for that person yourself.

3.3. The previous immigration rules allowed sponsorship of non-EEA adult dependant relatives where they were aged over 65, or living abroad in 'exceptional compassionate circumstances', providing they could be supported in the UK without recourse to public funds.[17] This rule set a high threshold yet was sufficient to allow for discretion to be applied and take into account the individual nature of family relationships and circumstances. The current rules do not permit this. Further, there was previously provision in the immigration rules for Retired Persons of Independent Means, where persons aged over 60 with an income of at least £25,000, who could demonstrate a close connection with the UK, and can maintain and accommodate themselves without recourse to public funds, were permitted to reside here. However, this category was closed to new entrants in November 2008. As a consequence, it has become virtually impossible for adult dependant relatives to live out their final years with their children in the UK, as evidenced by only one grant of settlement in this category between July and October 2012.

Please provide details of any other economic, social or practical considerations relating to the new rules affecting elderly dependents.

3.4. The fact that only one settlement visa was issued in the four month period referred to above illustrates that it is practically impossible to satisfy the stringent new criteria. Socially, the impact of the rule is that British citizens and settled persons are unable to live with and care for their elderly parents, which is a key element of family life. This will result in British citizens / settled residents spending more money to travel internationally to visit their parents and pay for their care abroad. This places additional strain on families where a loved one is ill or in the final years of their life. Children lose out on the social and cultural benefits of living close to their grandparents.

[15] Immigration Rules, HC514, Appendix FM, Section E-ECDR
[16] Letter from Lord Taylor of Holbeach to Lord Avebury dated 18 December 2012, in response to Lord Avebury's question [Official Report 23 Oct 2012 : Column 189].
[17] Rule 317 of previous Immigration Rules.

3.5. The category of adult dependent relatives makes up a small proportion of migrants to the UK, and consequently, it is submitted that the stringent new criteria are a disproportionate interference with family life.

The Coalition Government stated that its objectives in introducing new family migration rules were to tackle abuse, promote integration and relieve any burden on the taxpayer caused by family migration to the UK. Are the new family migration rules meeting these objectives?

3.6. It is submitted that the previous family migration rules were sufficient to prevent abuse and burdens on the taxpayer, and to promote integration. The new rules, in contrast, obstruct families who are able to financially support themselves from being together and rather than promoting, in fact serve to hinder integration:

a) The previous family migration rules ensured that only spouses/dependent relatives who could be adequately accommodated and financially maintained by their British/settled sponsoring family member could come to live in the UK, thereby ensuring that they would not be a burden on the taxpayer. Allowing third party support and sponsorship undertakings by other family members ensured that the migrant family member would be financially supported.

b) Under the previous rules, non-EEA spouses/partners did not have recourse to public funds during the probationary two year period. Migrants who could not be maintained without recourse to public funds during the two year probationary period would not be able to apply for settlement. This ensured that family migrants would not be a burden on the taxpayer.

c) The previous rules on accommodation and maintenance were sufficient to ensure that family migration would not place a burden on the taxpayer. The new financial requirements, introduced under the guise of contributing towards this aim, are really about reducing the numbers of migrants coming to the UK. The new rules for spouses/partners and adult dependent relatives, in fact have the consequence of making it more difficult for British / settled persons capable of supporting their non-EEA family members, to live together in the UK.

d) The extensive evidential requirements may be in place to ‘tackle abuse’. However, it is our submission that the actual consequence of the complicated financial evidential requirements is to increase confusion for persons who do in fact satisfy the minimum income but have difficulty providing all of the evidence required, in particular in the case of self-employed persons and persons whose income and savings do not come from a single source.

e) The previous two year probationary period for spouses/partners, prior to applying for settlement, served to better promote integration than the new five year probationary period. Non-EEA spouses and partners are now unable to settle in the UK for a much longer time period, despite making a home here with their British /settled spouse and children. Increasing the probationary period does not promote integration; instead, it creates uncertainty and added anxiety over one's immigration status.

f) Further, the new financial requirement, which needs to be satisfied throughout the five year probationary period, adds to a family's anxiety and is not conducive to integration. Should a family suffer a redundancy, illness or other economic or family crisis, the non-EEA family member's immigration status is at risk. Living in the UK for five years with insecurity over one's future immigration status does not assist the migrant family member to integrate.

g) Non-EEA family members who do not meet the financial requirements but are allowed to live in the UK as it is recognised that refusal would breach their right to a family life in the UK under Article 8 ECHR, need to live in the UK for ten years before they are allowed to acquire permanent residency. Requiring a person, whose family life in the UK is recognised, to renew their permission to stay in the UK every 2.5 years until they have lived here for 10 years, does not promote that person's integration.

What role does family life play in the integration process in the UK? How should the immigration system recognise and support the value of family life?

3.7. The support of one's family is vital to being able to integrate into the surrounding society and community. This applies as much to the British/settled person's integration into their community as it does to the migrant's integration. A British citizen whose spouse and children are living abroad because they cannot meet the financial requirements of the rules, is less likely to be positively integrating within his or her local community due to the emotional, practical and financial difficulties of being separated from his or her family. Likewise, a migrant who has moved to the UK to live with his or her British / settled spouse or partner, is better able to integrate if they are secure in the knowledge that they will be able to continue to live in this country even if their family were to suffer economic misfortune during their probationary period.

3.8. The UK immigration system should recognise the value of family life, as well as the individual nature of varying circumstances of different families in the UK. Seeking to codify 'family life' within a prescriptive and arbitrary set of immigration rules, which do not permit discretion nor flexibility fails entirely to grasp the meaning of family life.

3.9. We live in a globalised world. British citizens and settled residents travel, live abroad, fall in love, and form families with people from outside the European Union. Their family life must be respected. However, the consequences of the new rules have been to separate families who have the means to support themselves without relying on public funds, force

children to live apart from one of their parents, and prohibit persons capable of financially supporting their elderly parents from living with them and caring for them in the final years of their lives. Whilst the Coalition Government aims to reduce net migration, this should not be at the expense of breaking up families.

4. Further information

For further information in relation to this consultation response please contact:

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