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NICEM

SUBMISSION

**Review of the Role and Regulation of the Private
Rented Sector**

DSD

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Introduction

1.1 The Northern Ireland Council for Ethnic Minorities (NICEM) is an independent non-governmental organisation. As an umbrella organisation¹ 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.

1.2 Ensuring that the private rented sector (PRS) is well developed and regulated is a matter of particular importance to BME communities in Northern Ireland (NI). This is partly due to the large proportion of BME households utilising the PRS as a means of accommodation, with Census figures showing that 3.47% of PRS households (4298 households) are occupied by ethnic groups that make up just 1.79% of the total population.^{3 4}

1.3 Indeed, the preference for the PRS amongst BME communities is starkly illustrated by the fact that 79.9% of all BME households renting accommodation are doing so within the private sector, as compared to only 49.5% of 'White' households identified under the Census.⁵

1.4 Consequently, NICEM welcomes the Department's review of the role and regulation sector and, while acknowledging that many people enjoy a good standard of living in their current accommodation, the opportunity to indicate where shortcomings exist in the current system. These shortcomings largely concern the quality of housing supply, which may be addressed through the introduction of further regulation in line with that utilised in other parts of the United Kingdom (UK).

Affordability

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 is a political term that 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 united together against racism.

³ Northern Ireland Statistics and Research Agency, 'Northern Ireland Census 2011: Table CT0041NI: Private Rented by Ethnic Group – 6 Way Classification' (2011)

⁴ Northern Ireland Statistics and Research Agency, 'Northern Ireland Census 2011: Table QS201NI: Ethnic Group – Full Detail' (2011)

⁵ Northern Ireland Statistics and Research Agency, 'Northern Ireland Census 2011: Table CT0078NI: Theme Table on Tenure of Household' (2011)

Economic Profile of BME Communities in NI

- 2.1 One of the barriers to increased use of the PRS highlighted within the consultation document is affordability, with the potential for rent control or rent penalty measures being raised.
- 2.2 In this context, it is important to note that BME communities in NI, particularly non-settled ethnic communities, face relatively poor economic outcomes in comparison to the general population. Research has illustrated a degree of employment segregation within the labour market, with migrant workers concentrated within low-paying fields of work.⁶
- 2.3 Furthermore, migrant workers with insecure immigration status are vulnerable to exploitative working conditions, including low pay, unauthorised pay deductions and even conditions of forced labour.⁷
- 2.4 BME individuals more generally may face additional barriers to employment that may impact upon their economic outcomes. These include poor English language skills (with inadequate provision made in NI to remedy this issue), under-recognition of overseas qualifications, unfamiliarity with formal application processes and direct workplace discrimination.⁸
- 2.5 These barriers are key contributors to underemployment being a significant issue impacting BME communities in NI.^{9 10}
- 2.6 Employment outcomes have been impacted further for some communities following the economic downturn. 2014 research in the North West of NI has shown a high rate of unemployment (34%) amongst BME communities, with 64% of those having become unemployed within a year of the research.¹¹
- 2.7 Overall, evidence suggests that BME communities are more vulnerable to low-paying employment, exploitative working conditions and underemployment as a consequence of various different factors. When considered alongside the above data on BME prevalence within the PRS, this makes issues of affordability a key concern for this group.

Rent Control

⁶ Wallace, A. et al, 'Poverty and Ethnicity in Northern Ireland: An Evidence Review' (2014), p.25

⁷ ibid

⁸ Rogers, S. and Scullion, G., 'Voices for Change: Mapping the Views of Black and Minority Ethnic People on Integration and their Sense of Belonging in Northern Ireland (2014), pp.39-40

⁹ Equality Commission for Northern Ireland, 'Racial Equality – Policy Priorities and Recommendations (Summary Version)' (2014), p.4

¹⁰ Kouvonen, A. et al, "'We Asked for Workers, But Human Beings Came'" Mental Health and Wellbeing of Polish Migrants in Northern Ireland' (2014), p.4

¹¹ McAfee, C., 'The Impact of the Economic Downturn on the Black and Minority Ethnic People in the North West of Northern Ireland' (2014), pp.2-3

- 2.8 Consequently, it is important to ensure that any potential measures for improving the affordability of accommodation in the PRS are given full consideration.
- 2.9 For example, while the consultation document states that rent control may not be viable due to its potential impact on housing supply, it is important to note that the relationship between supply and rent control in the UK is not definitively established.
- 2.10 Recent research in England has questioned the assertion that rent control would adversely impact housing supply by disincentivising landlords from building houses¹², highlighting the fact that only 8% of private housing stock in England was built by the landlords who currently own it.¹³
- 2.11 While some impact on supply is likely inevitable, it is important to note that this effect need not be significant. While simplistic “first generation” rent controls (i.e. straightforward price ceilings) could drastically affect supply, more complex “second generation” schemes, such as controlling rent for the duration of individual tenancies, may offset this impact and prevent any aggregated effect on supply.¹⁴
- 2.12 Ultimately, the scale of impact upon housing supply will depend upon the model of rent control that is utilised¹⁵, thus it remains a possibility that a measure of benefit could be obtained for tenants in NI without detracting significantly from supply.
- 2.13 On this issue, it is important to note that a limited form of rent control is already in place in NI, whereby landlords who fail to obtain a Certificate of Fitness for a property built after 1945 - where letting to a tenant after the date of 1st April 2007 - are restricted in the amount of rent that they may charge. This regime has a statutory basis, under Article 40 of the Private Tenancies (Northern Ireland) Order 2006.
- 2.14 It is relevant that this rent control measure applies only to accommodation that fails to meet the required standard. In this manner, it may limit its impact on the incentivisation of new builds, whilst also tackling the issue of disproportionate rents for unfit housing (which accounted for 6.4% of private rented properties in 2011, higher than the 4.6% NI average and the highest of all recorded property types).¹⁶
- 2.15 However, the restriction of this measure’s application to older properties

¹² Mankiw, N., *Principles of Economics* (2014, Cengage Learning) p.116

¹³ Clarke, A. et al, ‘The Effects of Rent Controls on Supply and Markets’ (2015), p.39

¹⁴ Heath, S., ‘Rent Control in the Private Rented Sector (England)’ (2014) SN/SP/6760, p.10

¹⁵ Turner, B. and Malpezzi, S., ‘A Review of Empirical Evidence on the Costs and Benefits of Rent Control’ (2003) Swedish Economic Policy Review 11, p.14

¹⁶ Gray, P. et al, ‘Private Rented Sector: Stock Profile, Physical Condition & Key Government Indicators Report’ (2014), p.13

limits its usefulness in tackling disproportionate costs; 30.6% of unfit dwellings identified in 2011 were built after 1945 and are thus excluded from the scope of this measure.¹⁷

2.16 Consequently, expanding the scope of this extant measure could capture further instances of unfairly levied rent without significantly affecting supply, thus striking a balance between the supply, quality and cost of housing.

2.17 NICEM recommends that rent control measures under the Private Tenancies (Northern Ireland) Order 2006 be expanded to apply to unfit dwellings built after 1945.

Housing Quality

Landlord Licensing

3.1 As regards the improvement of PRS housing quality in NI, the regulation of landlords is an important factor to consider. The majority of landlords in NI are relatively inexperienced, with 66% owning 5 properties or fewer and many having entered the market only recently, during the property boom between 2005-2007.¹⁸

3.2 While the NI Government has taken action to improve practice amongst private landlords through the Landlord Registration Scheme, this scheme is limited in its usefulness by the lack of any prescriptive standards or enforcement.

3.3 Indeed, the Chartered Institute of Housing NI, a professional housing body with members working within the PRS, has advocated for licensing as a means of building knowledge and professionalism within the sector.^{19 20}

3.4 It is also notable that systems for licensing landlords already exist across the rest of the UK, under Sections 79-81 of the Housing Act 2004 in England and Wales, and under Section 175 of the Housing (Scotland) Act 2006 in Scotland.

3.5 One of the key reasons cited for introducing these licensing schemes is to improve housing/management standards, with evidence from councils in

¹⁷ Frey, J. et al, 'Northern Ireland House Condition Survey: Main Report' (2011), p.46

¹⁸ McNulty, U. and Gray, P., 'Private Rented Sector in Northern Ireland – Living in the Private Rented Sector: Landlord Perspectives Report' (2011), p.4

¹⁹ Chartered Institute of Housing NI, 'CIH NI Calls for Private Landlord Licensing' (2015) Available at: <http://www.cih.org/news-article/display/vpathDCR//templatedata/cih/news-article/data/NI/CIH_NI_calls_for_private_landlord_licensing> [Accessed 02/12/15] (not paginated)

²⁰ Chartered Institute of Housing NI, 'Licensed to Let?' (2015) Available at: <http://www.cih.org/news-article/display/vpathDCR//templatedata/cih/news-article/data/Licensed_to_let> [Accessed 02/12/15] (not paginated)

England illustrating the efficacy of licensing in raising these standards.^{21 22}

3.6 Consequently, it is important to give consideration to the potential for a licensing scheme to be utilised in NI to raise the quality of PRS accommodation, some 6.4% of which is currently unfit for human habitation.²³

3.7 While the consultation document raises concerns about the financial impact of 'blanket' licensing on reputable landlords, this is not a compelling argument against licensing per se, but rather against the excessive application of licensing.

3.8 In this regard, it is notable that current draft Regulations in England seek to place limits on the extant licensing system, such that further conditions must be met before selective licensing may be utilised in a given area.²⁴ The Department for Communities and Local Government has projected that these changes will "[ensure] that good landlords are not adversely impacted" by the licensing system.²⁵

3.9 Thus, it is possible to devise a system of licensing that does not financially impinge on 'good' landlords or their tenants, whilst ensuring that landlords are regulated in areas where bad practice pervades or vulnerable tenants are resident.

3.10 This could be achieved by ensuring that licensing systems are implemented locally, rather than nationally, subject to conditions similar to those projected under the draft Selective Licensing of Houses (Additional Conditions)(England) Order 2015.

3.11 These conditions include targeting areas where there are a large number of migrant workers, where housing conditions are poor and where there are high levels of deprivation or crime.²⁶

3.12 Ultimately, the licensing of landlords is a key tool for raising the management and property standards of an area, which is an issue of particular concern in NI, where there are a large number of unfit PRS properties.

3.13 NICEM recommends the introduction of a system of licensing for

²¹ The Scottish Government, 'A Place to Stay, A Place to Call Home: A Strategy for the Private Rented Sector in Scotland' (2013), p.16; Wilson, W., 'Selective Licensing of Privately Rented Housing (England & Wales)' (2015), p.1

²² Wall, T., 'Over 300 Landlords Prosecuted in Licensing Areas' (2013) Available at: <<http://www.ehn-online.com/news/article.aspx?id=10582>> [Accessed 02/12/15] (not paginated)

²³ op cit n 16

²⁴ The Selective Licensing of Houses (Additional Conditions)(England) Order 2015, Clauses 3-7

²⁵ See communiqué from Minister of State for Housing and Planning:

<http://www.landlords.org.uk/sites/default/files/15-03-11%20BL%20to%20LAS%20re%20Selective%20licensing.pdf>

²⁶ Selective Licensing of Houses (Additional Conditions)(England) Order 2015, Clauses 4-7

private landlords, targeting deprived areas, areas where there is a concentration of unfit properties and areas where a relatively large number of vulnerable tenants, such as migrant workers, reside.

The Fitness Standard

- 4.1 It must be noted that any arrangements for improving the quality of housing through licensing are dependent upon robust standards being in place. In this regard, NI is behind the rest of the UK, as it continues to apply the outdated Fitness Standard, which was replaced in England and Wales under Sections 1-10 of the Housing Act 2004 and in Scotland through the introduction of the Scottish Housing Quality Standard in 2004.
- 4.2 The standard established by NI's current regime is low – for example, the Fitness Standard views a single power outlet as 'adequate provision for heat' - and makes no provision on a number of factors that are assessed under the equivalent Health and Safety Rating System in England and Wales, such as crowding, entry by intruders, excess heat, noise and others.^{27 28}
- 4.3 It is noted that the Department for Social Development has committed to reviewing the Fitness Standard under its Strategy Action Plan for 2012-2017, with a projection being made that proposals would be released for consultation before the end of 2015.^{29 30}
- 4.4 However, a consultation on newly developed standards has yet to emerge. In terms of improving housing quality, it is vital that new standards be implemented, as any actions seeking to improve PRS housing quality, including licensing, will have limited effect unless adequate standards are in place.
- 4.5 NICEM urges the Department to release the new housing quality standard for consultation as a matter of priority.**

Tackling Anti-Social Behaviour

- 5.1 Anti-social behaviour in the PRS is a matter of concern for many BME communities in NI, particularly where this includes racially motivated incidents. Indeed, 71.5% of recorded race hate crimes in NI in 2014/15 involved anti-social type behaviour, including threats, harassment, assault and property damage.³¹

²⁷ Moss, C., 'Private Tenancies Order: One Year On' (2008) 69 Social Welfare Law Quarterly 18, p.18

²⁸ Department for Communities and Local Government, 'Housing Health and Safety Rating System: Guidance for Landlords and Property Related Professionals' (2006), pp. 3 and 4

²⁹ Department for Social Development, 'Facing the Future: Housing Strategy for Northern Ireland Action Plan 2012-2017' (2012) p.6

³⁰ Department for Social Development, 'Facing the Future: The Housing Strategy for Northern Ireland Action Plan Update' (2015), p.11

³¹ Police Service of Northern Ireland, 'Table 2.2: Recorded Crime with a Racist Motivation by Offence, 2004/05 to 2014/15' (2015)

5.2 Article 26 of the Housing (Northern Ireland) Order 2003 establishes in NI a system for tackling anti-social behaviour by allowing landlords to apply to the High Court or county courts for injunctions against such behaviour. While this provision may assist in addressing some cases of anti-social behaviour, its utility is impeded by its reliance on court proceedings.

5.3 Indeed, research in England, which utilises a similar system to NI, has shown that there is 'little, if any, evidence' of private landlords using injunctions to tackle anti-social tenants.³² Thus, a less cumbersome approach must be adopted in order to ensure that anti-social behaviour in the PRS is effectively dissuaded.

5.4 In Scotland, under Section 68 of the Antisocial Behaviour etc. (Scotland) Act 2004, local authorities are empowered to issue Anti-social Behaviour Notices to landlords whose tenants are engaged in anti-social behaviour. As stated under Section 68(3)(b) of the Act, the notices require landlords to take action to deal with the behaviour specified.

5.5 This approach has seen a measure of success, with housing data illustrating that the proportion of people who find antisocial behaviours to be fairly or very common in their neighbourhood has dropped by 31% in Scotland between 2006/07 and 2013/14.³³

5.6 A further important element of tackling anti-social behaviour in PRS housing is ensuring that private landlords are adequately informed on the actions they can take to address these behaviours.

5.7 For example, a number of Councils in England have developed initiatives that offer training to landlords on key issues related to anti-social behaviour, such as legal eviction, drug awareness and personal safety.³⁴

5.8 However, while the Department for Social Development currently offers guidance to social landlords on tackling anti-social behaviour, guidance is not provided to private landlords on this issue.³⁵

5.9 Whatever tools are made available to landlords regarding anti-social behaviour, it will be important to ensure that private landlords are made aware of these tools and what steps they can take to tackle anti-social behaviour.

5.10 NICEM recommends the introduction of a system whereby

³² Wilson, W., 'Anti-social Behaviour in Private Housing (England)' (2015), p.6

³³ The Scottish Government, 'Scotland's People Annual Report: Results from the 2014 Scottish Household Survey' (2015), p.57

³⁴ Home Office, 'A Guide to Anti-social Behaviour Tools and Powers' (2008), p.26

³⁵ Department for Social Development, 'Anti-social Behaviour: Guidance for the Northern Ireland Housing Executive' (2014)

landlords may be issued with Anti-social Behaviour Notices by local authorities, requiring them to take action to tackle tenants' anti-social behaviour.

5.11 It is further recommended that the Landlord Register be utilised to distribute guidance to private landlords on what constitutes anti-social behaviour, what tools are available to them to tackle anti-social behaviour and on how they may effectively use these mechanisms.

Letting Agencies

6.1 The regulation of letting agents is a matter of concern for all communities in NI. As noted within the consultation document, there is no regulation of letting agents within NI and research has highlighted a proliferation of bad practice within this vacuum.

6.2 For example, 2013 research found that most letting agencies do not advertise costs on their websites and some have proven reluctant to divulge their fees over the phone without significant prompting.³⁶ This lack of transparency makes it difficult for tenants to compare costs across agencies, placing them at risk of incurring substantial upfront costs and obstructing them from obtaining private rented accommodation.

6.3 While a subsequent ruling by the Advertising Standards Authority (ASA) in 2013 asserted that agencies must be clear about their costs, the lack of a regulation system may impede the implementation of this decision, with reliance being placed upon individuals reporting non-compliant agents to the ASA.³⁷

6.4 This generates a wholly reactive system that, unlike a registration-based system, does not allow for the proactive informing of agents about their duties in this regard in order prevent bad practice before it occurs. It is notable that under the current landlord registration system, for example, landlords are provided with information on their various obligations.

6.5 The charging of upfront fees may also obstruct individuals from entering the PRS, particularly amongst BME communities that experience disproportionately low economic outcomes (as discussed above).

6.6 Research has illustrated that while the majority of letting agencies charge upfront fees for a variety of different services - including administration and credit checks – the fees levied far exceed the actual cost of providing these services, with an average of £47.69 being charged for each of these

³⁶ Housing Rights NI, 'The Hidden Costs of Private Renting in NI: An Investigation into the Practice of Letting Charges' (2013), pp.3-4

³⁷ Advertising Standards Authority Ruling on Your-move.co.uk Ltd. (2013) A12-201575

services.³⁸

- 6.7 This financial barrier to entering the PRS is exacerbated by bad practice that has flourished in an unregulated environment; research has illustrated that some letting agents may be 'double charging', that is charging tenants for services that they are also providing to landlords.³⁹
- 6.8 Furthermore, individual instances have shown one letting agent charging £150 to amend the names on a tenancy agreement and another charging £100 per tenancy for administration costs.⁴⁰
- 6.9 These financial obstructions to some BME communities aside, NICEM is particularly concerned at the evidence that at least one letting agent has levied fees in a racially discriminatory manner, contrary to the Race Relations (Northern Ireland) Order 1997. The lack of oversight and regulation of letting agencies makes such practices easier to engage in, both deliberately and accidentally.⁴¹
- 6.10 Consequently, the introduction of a system for regulating the practices of letting agents in NI is a matter of priority. Such regulation is conducted in different ways in other parts of the UK.
- 6.11 For example, in Scotland Section 82 of the Rent (Scotland) Act 1984 prevents any tenancy fees from being levied, except rent and a refundable deposit. Furthermore, Part 4 of the Housing (Scotland) Act 2014 creates a regulatory system for letting agents, including a register (Section 29), the requirement that the agent be a fit and proper person (Section 32(2)(a)) and training requirements (Section 32(2)(c)).
- 6.12 Naturally, preventing letting agents from levying any fees to tenants would prevent the type of exploitative fee arrangements and bad practice outlined above. Although there have been claims that costs have been passed onto tenants in the form of increased rents in Scotland, research has suggested that this increase is small, temporary and largely explicable by other economic factors.^{42 43}
- 6.13 While it is too early yet to establish the impact of the recent regulatory reforms in Scotland, a preliminary assessment by the Scottish Government highlighted its anticipation that the regulatory system would increase service standards and professionalism amongst letting agencies, whilst also increasing standards and quality within the PRS generally.⁴⁴

³⁸ *ibid* p.2

³⁹ *ibid*

⁴⁰ *ibid* p.4

⁴¹ *ibid*

⁴² Wilson, W., 'The Regulation of Private Sector Letting and Management Agents (England)' (2015), p.22

⁴³ Shelter, 'End Letting Fees: Lessons from the Scottish Letting Market' (2013), p.5

⁴⁴ The Scottish Government, 'Consultation on a Draft Statutory Code of Practice and Training

- 6.14 Akin to Scotland, Wales utilises a compulsory registration system (under Section 4 of the Housing (Wales) Act 2014) that requires the letting agent to be a fit and proper person and meet certain training requirements (Section 19(2)(a) and (b)).
- 6.15 England and Wales do not prohibit tenancy fees in the same manner as Scotland. However, as noted above, the Advertising Standards Authority requires all letting agents in the UK to make it clear to tenants what their fees and charges are, including on websites.
- 6.16 England is the only part of Great Britain that does not require the registration of letting agents. However, they are required to join a 'redress scheme' under Article 3 of the Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014.
- 6.17 These schemes allow for the investigation of complaints against landlords by an independent person and the levying of fines against non-compliant agents by local authorities.⁴⁵
- 6.18 In observing the different approaches utilised in Great Britain, it is apparent that a system of registering letting agents would allow the greatest level of oversight. Indeed, the fitness and training requirements attached to the registration process would likely be the most direct manner of tackling the unprofessional conduct and bad practice that has proliferated within the unregulated environment of NI.
- 6.19 Furthermore, this could be integrated with existing measures on fee transparency, through the dissemination of information on agents' obligations to registered parties.
- 6.20 NICEM recommends that a registration system for letting agents be introduced in Northern Ireland, based on the systems utilised in Scotland and Wales. Letting agents should be required to be fit and proper persons, with appropriate training as outlined in regulations.**
- 6.21 It is also recommended that this registration system be utilised as a mechanism for disseminating information to letting agents on their obligations, including those on the advertising of their costs.**

Fast-Track Eviction

- 7.1 As noted in the consultation document, Section 21 of the Housing Act 1988 allows landlords in England and Wales to obtain a court order for possession where they have terminated an assured shorthold tenancy with two months' notice to the tenant.

Requirements for Letting Agencies in Scotland' (2015), p.59

⁴⁵ op cit n 42 p.4

- 7.2 In essence, this means that a tenant may be evicted from the premises with no reason given by the landlord and no recourse to contest their eviction. While this may accelerate the eviction process for landlords, concerns have been raised in England that landlords can use this procedure to retaliate against tenants who have tried to get health and safety issues in their premises addressed.⁴⁶
- 7.3 Evidence gathered by the Citizens' Advice Bureau in England has shown a number of case studies where Section 21 notices were utilised to evict tenants who complained to statutory agencies about their housing conditions.⁴⁷
- 7.4 Indeed, a survey of environmental health officers in England showed that 54% of respondents felt that tenants were 'sometimes' deterred from using help because of fears of being evicted, 46% said that tenants were 'often' deterred and 2% said that tenants were 'always' deterred. No respondents felt that tenants were never deterred.⁴⁸
- 7.5 The reality of retaliatory evictions has been acknowledged by the Government in England and Wales, with attempts being made to dissuade this practice through the Deregulation Act 2015 and the Renting Homes Bill (Wales).
- 7.6 While it is too early to determine whether this legislation will be effective in preventing retaliatory evictions, the fact that its existence was necessitated illustrates the harmful impact that fast-track proceedings may have on security of tenure.
- 7.7 Thus, it would seem inadvisable for the Department to implement such lax eviction procedures in NI due to the potential for tenant exploitation and for the implementation of housing standards to be impeded, including the Department's planned updated health and safety standards.
- 7.8 In this context it is notable that any measures that facilitate the exploitation of tenants would disproportionately impact on BME communities, as BME groups are much more likely to utilise PRS housing than the 'White' majority in NI (PRS housing comprised 42.8% of all BME households, compared to 14.6% of all 'White' households in 2011).⁴⁹
- 7.9 NICEM recommends that, due to the potential impact on security of tenure and the implementation of housing standards, no system for fast-track eviction be introduced in Northern Ireland.**

⁴⁶ Crew, D., 'The Tenant's Dilemma – Warning: Your Home is at Risk if You Dare Complain' (2007), p.4

⁴⁷ *ibid* pp.6-7

⁴⁸ *ibid* p.8

⁴⁹ *op cit* n 5

For further enquiries about this submission, please contact the following:

Mr. Luke Kelly, Volunteer Policy Officer or
Patrick Yu, Executive Director of NICEM

Northern Ireland Council for Ethnic Minorities

Ascot House, 1/F

24-31 Shaftesbury Square

Belfast BT2 7DB

Northern Ireland

UK

Tel: +44 28 9023 9645

Fax: +44 28 9031 9485

Email: luke@nicem.org.uk or patrick@nicem.org.uk