



Home Office

**UK Border
Agency**

COMPULSORY IDENTITY CARDS FOR FOREIGN NATIONALS

RESULTS OF THE CONSULTATION ON THE
“CODE OF PRACTICE ABOUT THE SANCTIONS
FOR NON-COMPLIANCE WITH THE BIOMETRIC
REGISTRATION REGULATIONS”

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FOREWORD BY THE PARLIAMENTARY UNDER-SECRETARY OF STATE



Foreign nationals come to the United Kingdom for a wide range of reasons such as to study or work. Using advances in biometric technology we can reinforce our business processes and cut illegal working, protect legal migrants, and identify those trying to evade our rules and laws. This will help strengthen border security and lay the foundation for the wider National Identity Scheme. By recording a person's fingerprints, we can now fix a person to a single identity making it simpler to check whether someone is who they say they are. The card will make provide reassurance and identity protection to the many here legally.

The *UK Borders Act 2007* gives the Government the power, through secondary legislation, to issue identity cards to foreign nationals. These new cards will confirm both a person's immigration status and entitlement to work and access to public funds in the UK. The Act allows the Secretary of State to make regulations that require a person to apply for an identity card for foreign nationals, and to provide their biometric identifiers, such as their fingerprints and facial image. These regulations may impose other requirements, including a requirement for the card holder to provide it in certain situations so it can be checked and verified.

Non-compliance with the requirements may result in an imposition of a sanction – for example, the person's application for leave to enter or remain in the UK may be refused or rejected; the person's application for a card may be refused; the person's existing leave to enter or remain in the UK may be curtailed or cancelled; or the person may be required to pay a civil penalty.

As part of our obligations under the *UK Borders Act 2007* we have produced a Code of Practice and consulted on it. This document sets out the results of our public consultation on the *Code of Practice about the sanctions for non-compliance with the biometric registration regulations*. It includes our response to your views and the changes we have made to the Code as a result. The full detailed analysis on the consultation is being published separately.

A handwritten signature in black ink that reads "Meg Hillier".

Meg Hillier MP
Parliamentary Under-Secretary of State

¹ Known in legislation as biometric immigration documents

EXECUTIVE SUMMARY AND RESPONSES

This report describes the findings from a public consultation on the “Code of Practice about the sanctions for non-compliance with the biometric registration regulations” and sets out the Government response. The consultation period ran from 25 February to 5 May 2008. A total of 17 responses were received during this time. Fourteen responses were received electronically and there were three hard copy responses. All responses were analysed. Percentages given are based on the number of respondents who answered the particular question, not the total of 17 who responded to the consultation.

The report details the results of analysis undertaken into responses to the consultation, in the order of the consultation questions, as follows:

- The compliance requirements (questions 1, 1a and 1b.)
- The types of sanctions (question 2)
- Immigration sanctions (question 3a – 3d)
- Civil penalties (questions 4a – 4f)
- Provisions for vulnerable people (questions 5a – 5b)
- When a sanction may not be imposed (questions 6a – 6b)
- Open question for further comment (question 7).

THE COMPLIANCE REQUIREMENTS

Respondents’ comments

A significant proportion of respondents felt that the distinction between the likely primary and secondary compliance requirements of the Code of Practice was not clear and most respondents commented on the requirements which they thought should be reclassified between primary and secondary requirements.

Government response

The Government will make changes to simplify the requirements by removing the distinction between primary and secondary requirements and introducing

“application” and “maintenance” requirements, with the intention of simplifying the differing types of requirement.

THE TYPES OF SANCTIONS

Respondents’ comments

Respondents raised a concern that the Code of Practice lacked clarity on the different sanctions that might be imposed in different circumstances and for failure to meet primary and secondary requirements.

Government response

The Code will be amended to clearly specify that there are three types of sanction which can be applied: civil penalty, immigration, and refusal to issue a card.

IMMIGRATION SANCTIONS

Respondents’ Comments

There was a mixed response on this point with many respondents concerned that the Code of Practice did not clearly outline reasons for not imposing an immigration sanction for failure to comply with a compliance requirement and requesting further detail be provided and more precise terminology employed to make the Code of Practice clearer.

Many of the respondents considered that the Code of Practice clearly outlined the circumstances when the Secretary of State would refuse an immigration application for an Identity Card for a foreign national, or when a person’s existing leave to remain might be varied (curtailed) or cancelled.

Most respondents who expressed a view considered that the Code of Practice clearly outlined the circumstances when a person might appeal against the imposition of an immigration sanction. Those who disagreed sought clarity on when an appeal would be possible and thought the lack of appeal rights on the granting of an Identity Card would lead to cases of judicial review.

Government response

The government has updated the draft to specify that there are three types of sanction and when they will be applied.

CIVIL PENALTIES

Respondents' comments

There was a mixed response on this point with many respondents concerned that the Code of Practice did not clearly outline the circumstances when the Secretary of State may issue a civil penalty notice.

Respondents most frequently (but not exclusively) selected 'those with parental responsibility' and/or 'those given responsibility for a child's care through the courts' as designated responsible adults.

Respondents were divided on whether the Code of Practice clearly outlined the circumstances when a person might object to or appeal a civil penalty notice.

A majority of respondents considered 20 working days was an insufficient period within which to object to a civil penalty notice. A period of 30 or more working days was preferred.

Government response

The Government will amend the Code to increase the period for objecting to 30 working days plus 2 working days for mailing. In addition the draft Code has been amended to make clear that the Secretary of State can cancel a civil penalty notice on consideration of an objection.

PROVISIONS FOR VULNERABLE PEOPLE

Respondents' comments

Nearly half of the respondents thought that the Code of Practice did not clearly outline the circumstances when the Secretary of State would consider a person to be vulnerable and a number of respondents commented on additional circumstances to consider under the provision of vulnerable people. These include suggestions of considerations for those with mental incapacity and those who are victims in some way.

Government response

The Government has included the victims of domestic violence under this category. Every effort will be made to help individuals meet their obligations under the regulations, however, there is no intention to exempt individuals from the requirement if they

are physically able to comply. It is not possible to give exhaustive examples about how UKBA will manage vulnerable foreign nationals.

WHEN A SANCTION MAY NOT BE IMPOSED

Respondents' comments

A majority of respondents were unsure whether the Code of Practice clearly outlined the circumstances when a sanction would not be imposed.

Government response

The government has no plans to amend the Code in this area following consultation. We will allow the Code to run and review it in the future.

APPENDIX 1

ANALYSIS OF RESPONSES RECEIVED TO THE “CODE OF PRACTICE ABOUT THE SANCTIONS FOR NON-COMPLIANCE WITH THE BIOMETRIC REGISTRATION REGULATIONS”

SECTION 1 THE COMPLIANCE REQUIREMENTS

Question 1a:

Does the Code of Practice clearly distinguish between the likely primary and secondary compliance requirements of the forthcoming biometric registration regulations? (See Section 2 of the Code of Practice)

Ten of the 17 respondents said that the Code of Practice did not clearly distinguish between the likely primary and secondary compliance requirements of the biometric registration regulations. Five respondents agreed that a clear distinction is made and two respondents were unsure.

Some respondents suggested that any change in circumstances or personal details, and all registration requirements, should be secondary requirements. They requested clarification on potential penalties and the timeframes for compliance and questioned the legal basis of immigration sanctions.

Table 1: Q1a Does the Code of Practice clearly distinguish between the likely primary and secondary compliance requirements of the forthcoming biometric registration regulations?

Response	Number of Respondents
Yes	5
No	10
Unsure	2
Total	17

All of the ten respondents who said the Code of Practice did not make a clear distinction between primary and secondary compliance requirements provided comments.

Nine respondents commented on what they considered to be a lack of clarity and an artificial distinction between primary and secondary compliance requirements. Five of those respondents felt it was unclear why there was greater importance attached to some compliance requirements than others and felt distinctions between the categories could be seen as arbitrary. Two of these respondents saw both compliance requirements as leading to the same sanctions.

Concerns were also raised that the terminology of the code was very legalistic and could be confusing to non-EAA citizens or even a lay person.

Question 1b:

Do you think that any of the compliance requirements (whether primary or secondary) should be reclassified – i.e. a secondary compliance requirement re-classified as a primary compliance requirement? If so, please say which requirement(s) you think should be re-classified – and why.

Fifteen respondents commented on the requirements they thought should be reclassified. The main theme among respondents was a concern about the lack of distinction between primary and secondary requirements.

Five respondents reiterated calls for greater clarification on the division between primary and secondary compliance requirements including one respondent who required clarification on the distinction between primary and secondary requirements before they could comment on reclassification. Two of these respondents felt the classifications to be artificial.

SECTION 2 THE TYPES OF SANCTIONS**Question 2:**

Does the Code of Practice clearly summarise the different sanctions which might be imposed? (See Section 3 of the Code of Practice)

Views were divided on whether the Code of Practice clearly summarizes potential sanctions. The majority of respondents (nine) agreed that the Code did clearly summarize the sanctions whilst seven respondents disagreed.

Table 2: Q2 Does the Code of Practice clearly summarise the different sanctions which might be imposed?

Response	Number of Respondents
Yes	9
No	7
Unsure	1
Total	17

Respondents sought clarity on how sanctions will operate and how each sanction will be imposed and if there would be differences depending on the class of immigrant. Two respondents thought that were three classes of sanctions, namely civil penalties, immigration sanctions and refusal to issue an identity card. One of these respondents pointed out that refusal to issue a card was included within immigration sanctions in one section of the code but not in another. It was consequently unclear in which circumstances there could be a refusal of an immigration application rather than a refusal to issue a card. This was important because one decision was appealable, but not the other.

Four respondents were generally concerned about how decisions would be made on which sanctions to use and the potential for discriminatory impact, including the imposition of immigration sanctions on those less able to afford to pay a civil penalty.

Concerns were also raised that the distinction between sanction and civil penalty was unclear and that it was unclear as to which is more serious.

SECTION 3 IMMIGRATION SANCTIONS

Question 3a:

Does the Code of Practice clearly outline the circumstances when an immigration sanction would not be imposed for failure to comply with a compliance requirement? (See Section 5 of the Code of Practice)

Respondents were divided on whether the Code of Practice clearly outlines the circumstances for when an immigration sanction would not be imposed for failure to comply with a compliance requirement: seven respondents agreed and eight disagreed.

Table 3: Q3a Does the Code of Practice clearly outline the circumstances when an immigration sanction would not be imposed for failure to comply with a compliance requirement?

Response	Number of Respondents
Yes	7
No	8
Unsure	2
Total	17

Seven of the eight respondents who felt the Code of Practice did not clearly outline the circumstances when an immigration sanction would not be imposed commented on this view or suggested how the information might be improved.

Three respondents sought clearer definitions to better understand this issue, particularly in respect of what are ‘compelling reasons’. One wanted clarification on what would be a ‘compelling reason’ for cancelling Indefinite Leave to Remain (ILR). Another suggested a non-exhaustive list of factors that could lead to the cancellation of ILR be provided and the third stated that the guidance was unclear on what would be compelling reasons

Three respondents thought that it was unclear how sanctions would apply to different categories of immigrants and how the Code would interrelate with other provisions such as human rights legislation and international conventions on refugee status.

Question 3b:

Does the Code of Practice clearly outline the circumstances when the Secretary of State would refuse an immigration application and an application for an identity card for foreign nationals? (See Section 5 of the Code of Practice)

Ten respondents said that the Code of Practice does not clearly outline the circumstances when the Secretary of State would refuse an immigration application and an application for an identity card for foreign nationals. Six respondents thought that these circumstances were clearly outlined.

Table 4: Q3b Does the Code of Practice clearly outline the circumstances when the Secretary of State would refuse an immigration application and an application for an identity card for foreign nationals?

Response	Number of Respondents
Yes	6
No	10
Unsure	1
Total	17

Question 3c:

Does the Code of Practice clearly outline the circumstances when a person’s existing leave to remain in the UK might be varied (curtailed) or cancelled? (See Section 5 of the Code of Practice)

Nine respondents said that the Code of Practice did not clearly outline the circumstances when a person’s existing leave to remain in the UK might be varied (curtailed) or cancelled. Seven respondents agreed that these circumstances were clearly outlined in the Code of Practice.

Table 5: Q3c Does the Code of Practice clearly outline the circumstances when a person’s existing leave to remain in the UK might be varied (curtailed) or cancelled?

Response	Number of Respondents
Yes	7
No	9
Unsure	1
Total	17

Nine respondents commented on their negative response to how clearly circumstances were outlined for the refusal of immigration applications and ID cards and / or the curtailment or cancellation of Indefinite Leave to Remain (ILR).

Five respondents considered that the wording of the Code was ambiguous and subjective. For example, it is not clear how many infringements of primary and secondary requirements would affect Indefinite Leave to Remain (ILR). Respondents wanted to know what weight a primary requirement had compared to as secondary requirement.

These respondents commented that the process needs to be more open and transparent and unambiguous – words such as ‘reasonable’ were disputed

Three respondents felt that a complete list of definitions was required to clarify when applications or rights could be refused, curtailed or cancelled.

Question 3d:

Does the Code of Practice clearly outline the circumstances when a person might appeal against the imposition of an immigration sanction? (See Section 5 of the Code of Practice)

The 15 respondents who gave a view on whether the Code of Practice clearly outlines the circumstances when a person might appeal against the imposition of immigration sanction were divided. Seven respondents agreed and five disagreed.

Table 6: Q3d Does the Code of Practice clearly outline the circumstances when a person might appeal against the imposition of an immigration sanction?

Response	Number of Respondents
Yes	7
No	5
Unsure	3
Total responses to question 3d	15
No response, and no comment	2

Three respondents saw a need to clarify when an appeal is possible. One felt it was not clear when the sanction would be to refuse of an application for leave, or curtailment of existing leave, rather than refusal to issue an ID card.

SECTION 4 CIVIL PENALTIES

Question 4a.

Does the Code of Practice clearly outline the circumstances when the Secretary of State may issue a civil penalty notice? (See Section 6 of the Code of Practice)

Eight respondents said that the Code of Practice did not clearly outline the circumstances when the Secretary of State may issue a civil penalty notice. Five respondents thought that these circumstances were clearly outlined.

Table 7: Q4a Does the Code of Practice clearly outline the circumstances when the Secretary of State may issue a civil penalty notice?

Response	Number of Respondents
Yes	5
No	8
Unsure	2
Total responses to question 4a	15
No response, and no comment	2

Four respondents wanted to see a list setting down criteria that would be seen as ‘compelling’. These respondents felt that this could take some of the ambiguity out of the process.

Question 4b:

How important should the following factors be in determining the amount of the civil penalty? (See Section 6 of the Code of Practice)

- i) Whether the person has failed to meet a primary or secondary compliance requirement?

Ten of the respondents felt that failure to meet a primary or secondary compliance requirement should be either important or very important in determining the amount of the civil penalty. Four of the respondents were unsure about the importance of this factor.

Table 8: Q4b How important should the following factors be in determining the amount of the civil penalty? i) Whether the person has failed to meet a primary or secondary compliance requirement?

Response	Number of Respondents
Very important	6
Important	4
Not very important	1
Not at all important	0
Unsure	4
Total responses to Question 4bi	15
No response, and no comment	2

- ii) Whether the person has a history of non-compliance?

Twelve of the respondents felt that a history of non-compliance was either important or very important in determining the amount of the civil penalty.

Table 9: Q4bii How important should the following factors be in determining the amount of the civil penalty? ii) Whether the person has a history of non-compliance?

Response	Number of Respondents
Very important	8
Important	4
Not very important	2
Not at all important	0
Unsure	1
Total responses to Question 4bii	15
No response, and no comment	2

- iii) Whether there are children aged under 18, who have also failed to comply, in the person's household?

Respondents were divided on the importance of the presence of children under the age of 18 who have also failed to comply in the household. Eight of the 15 respondents thought this was either important or very important whilst 5 of the respondents thought it was not very or not at all important.

Table 10: Q4b How important should the following factors be in determining the amount of the civil penalty? iii) Whether there are children aged under 18, who have also failed to comply, in the person's household?

Response	Number of Respondents
Very important	3
Important	5
Not very important	1
Not at all important	4
Unsure	2
Total responses to Question 4biii	15
No response, and no comment	2

iv) Whether the person has limited financial means?

Ten of the respondents thought that whether a person has limited financial means should be either an important or a very important factor in determining the amount of the civil penalty. Four of the respondents thought this was not very or not at all important.

Table 11: Q4b How important should the following factors be in determining the amount of the civil penalty? iv) Whether the person has limited financial means?

Response	Number of Respondents
Very important	6
Important	4
Not very important	2
Not at all important	2
Unsure	1
Total responses to Question 4biv	15
No response, and no comment	2

Question 4c:

Which, if any, of the following should be considered as a 'designated responsible adult'?

Seven respondents said that parents with parental responsibility should be considered as a 'designated responsible adult'. The same number of respondents said that adults given responsibility through the court for a child's care should be considered a 'designated responsible adult'. Four respondents thought adults given care of children through private fostering and three that other responsible adults should be considered as 'designated responsible adults'.

Table 12: Q4c: Which, if any, of the following should be considered as a 'designated responsible adult'? Please tick all that apply.

Response	Number of Respondents
Person with parental permission	2
Person with parental responsibility	7
Adult given responsibility for child's care through courts	7
Adult given care of child through private fostering	4
Other responsible adult	3
Unsure	5
Other	2

Question 4d:

Does the Code of Practice clearly outline the circumstances when a person might object and appeal to a civil penalty notice? (See Section 6 of the Code of Practice)

Respondents were divided on whether the Code of Practice clearly outlines the circumstances for objection and appeal to a civil penalty notice. Seven of 15 respondents thought that circumstances were clearly outlined but five respondents disagreed.

Table 13: Q4d Does the Code of Practice clearly outline the circumstances when a person might object and appeal to a civil penalty notice?

Response	Number of Respondents
Yes	7
No	5
Mixed views	1
Unsure	2
No response, but commented	1
No response, and no comment	1
Total	17

Three respondents sought greater clarity on rights of objection and appeal.

Question 4e:

Do you think 20 working days is a suitable period within which to object to a civil penalty notice? (See Section 6 of the Code of Practice)

Twelve respondents thought that 20 working days was not a suitable period within which to object to a civil penalty notice.

Table 14: Q4e Do you think 20 working days is a suitable period within which to object to a civil penalty notice?

Response	Number of Respondents
Yes	3
No	12
Unsure	1
Mixed views	1
Total	17

SECTION 5 PROVISIONS FOR VULNERABLE PEOPLE

Question 4f:

If you have answered 'No' to the question above, what period do you believe should be introduced?

Of those respondents who thought that 20 days was not a suitable period within which to object to a civil penalty notice the majority suggested an alternative time period of 30 days.

Table 15: Q4f: If you have answered 'No' to the question above, what period do you believe should be introduced?

Response	Number of Respondents
10 working days	0
15 working days	0
25 working days	0
30 working days	7
40 working days	2
90 working days	1
No suggestion made	2
Total	12

Question 5a:

Does the Code of Practice clearly outline the circumstances when the Secretary of State would consider the person to be vulnerable? (See Section 7 of the Code of Practice)

Eight respondents thought the Code of Practice did not clearly outline the circumstances when the Secretary of State would consider the person to be vulnerable but five respondents agreed that the circumstances were clearly outlined.

Table 16: Q5a Does the Code of Practice clearly outline the circumstances when the Secretary of State would consider the person to be vulnerable?

Response	Number of Respondents
Yes	5
No	8
Unsure	3
Total responses to Question 5a	16
No response, and no comment	1

Three respondents were concerned that the list of 'vulnerable' provided was exclusive and that there may be many other categories of 'vulnerable' people. These respondents felt each case should be dealt with on its merits.

Three respondents had concerns for how victims of trafficking would be managed.

Two respondents sought further details on what constitutes relevant 'serious' medical conditions, and the impact this might have on the timeframe within which requirements may be delayed.

SECTION 6 WHEN A SANCTION MAY NOT BE IMPOSED

Question 5b:

Are there any other circumstances which the Secretary of State should consider under the provisions for vulnerable people – if so, what?

Seven respondents commented on other circumstances which the Secretary of State should consider under the provisions of vulnerable people and made a number of suggestions. None of the suggestions was mentioned by more than one respondent indicating no strong themes in this area.

Question 6a:

Does the Code of Practice clearly outline the circumstances when a sanction would not be imposed? (See Section 8 of the Code of Practice)

Nine respondents thought the Code of Practice did not clearly outline the circumstances when a sanction would not be imposed but seven respondents agreed that the circumstances were clearly outlined.

Table 17: Q6a Does the Code of Practice clearly outline the circumstances when a sanction would not be imposed?

Response	Number of Respondents
Yes	7
No	9
Unsure	1
Total	17

Five respondents sought clarification on what would be defined as ‘satisfactory’ evidence.

SECTION 7 OPEN QUESTION FOR FURTHER COMMENT

Question 6b:

Do you think there are any other circumstances in which the Secretary of State should consider not issuing a sanction for non-compliance?

Over half of 14 respondents (8) were unsure if there were any other circumstances in which the Secretary of State should consider not issuing a sanction for non-compliance. Four respondents thought there were other circumstances and two thought there were no other circumstances.

Table 18: Q6b Do you think there are any other circumstances in which the Secretary of State should consider not issuing a sanction for non-compliance?

Response	Number of Respondents
Yes	4
No	2
Unsure	8
Total responses to question 6b	14
No response, but commented	1
No response, and no comment	2

There were no clear themes in respondents' suggestions as to other circumstances in which the Secretary of State should consider not issuing a sanction for non-compliance.

Question 7:

Please feel free to provide any other comments on any aspect of the Code of Practice:

Ten respondents provided other comments on various aspects of the Code of Practice. A wide range of comments were raised and the main areas of concern (raised by more than one respondent) were:

- Concerns about the effect the Code and its sanctions would have on human rights, civil liberties.
- Concerns about data storage including safety and security of data.
- No consultation sought on 'Process before issuing a sanction'.

APPENDIX 2

BACKGROUND AND APPROACH TO THE CONSULTATION

BACKGROUND

In October 2007, Royal Assent of the UK Borders Act 2007 gave the Government the power to begin issuing identity cards to foreign nationals. These new cards will confirm both a person's immigration status and entitlement to work and/or access to public funds in the UK. The Act obliges UKBA to issue a Code of Practice about its proposals for ensuring compliance with the rules. This consultation, therefore, sought views on the draft 'Code of Practice about the Sanctions for Non-compliance with the Biometric Registration Regulations'.

Those who wished to respond to the consultation were asked to do so no later than 4th May 2008. All responses received by 6th May 2008 are included in this analysis.

Letters and e-mails were sent to approximately 180 organisations identified as key stakeholders to alert them to the consultation and encourage responses. Reminders were sent to increase response rates. The consultation was also made available via the Border and Immigration Agency (now the UK Border Agency), and Home Office websites. Respondents could return either hard-copy or electronic responses.

The consultation period ran from 25 February to 5 May 2008. A total of 17 responses were received during this time. Fourteen responses were received electronically and there were three hard copy responses.

Please note that, given the very small number of respondents, findings cannot necessarily be considered representative of the general population or the stakeholders identified. Some response bases are particularly small as not all respondents answered each question.

APPROACH TO THE ANALYSIS OF CONSULTATION QUESTIONS

The majority of the questions contained in the consultation document were presented with response options (e.g. yes, no or unsure). Each question also gave respondents the opportunity to provide any further comments through the use of free response sections. Responses to each question were first analysed on the basis of the response options provided. Further comments to each question were then coded into commonly occurring themes if such were apparent

17 responses were analysed. With this number of responses, a full analysis was not possible by organisation size or sector. Neither is percentages provided for most questions as the small number of responses renders them less useful than the actual numbers, which are provided in tables.

Percentages, where given, in the results are based on the number who answered the particular question, not the total of 17 responses.

APPENDIX 3

DEMOGRAPHIC DETAILS OF THE RESPONDENTS

Nine responses were received from organisations, four from members of the general public and four from people responding in a professional capacity.

Table 19: Thinking of the response that you have given to this consultation, who are you responding on behalf of?

Response	Number of Respondents
Member of the general public	4
In a professional capacity	5
On behalf of an organisation	9
Other	1
Prefer not to state	0
Total number of individual responses	17

N.B. Multiple responses could be selected for this question, therefore the number of respondents per category does not add up to the total number of respondents answering this question

Five responses came from organisations involved in immigration or legal advice, three from voluntary or community organisations or charities and two from an educational institution.

Table 20: Which, if any, of the following best describes your organisation? (Please select all that apply)

Response	Number of Respondents
Voluntary/community organisation or charity	3
Educational institution	2
Local government	1
Immigration advice or legal advice provider	5
Healthcare provider	1
Central government	0
Private sector company	0
Other (Trade Union)	3
Prefer not to state	0
Total	11

N.B. Multiple responses could be selected for this question, therefore the number of respondents per category does not add up to the total number of respondents answering this question

Twelve respondents supplied details of their nationality. The majority (8) were UK nationals, two were non-EEA nationals and one had dual nationality.

Table 21: From the list below, please select the option which best describes your current nationality.

Response	Number of Respondents
UK National	8
Other EEA or Swiss National	0
Non-EEA National	2
Dual Nationality	1
Prefer not to state	6
Total	17

N.B. Multiple responses could be selected for this question, therefore the number of respondents per category does not add up to the total number of respondents answering this question

APPENDIX 4

RESPONDENTS BY ORGANISATION

Responses to the Consultation were received from the following organisations:

1. Equality and Human Rights Commission
2. Immigration Law Practitioners Association
3. Joint Council for the Welfare of Immigrants
4. Northern Ireland Human Rights Commission
5. Office of the Immigration Services Commissioner
6. Royal College of Nursing
7. UK Council for International Student Affairs
8. University of Edinburgh
9. West Norfolk Diverse Community Forum

