Independent review of the Overseas Domestic Workers visa

Submission by the Anti-Trafficking Monitoring Group (ATMG)

Introduction

The Anti-Trafficking Monitoring Group (ATMG) monitors the UK's compliance with, and implementation of, the 2005 Council of Europe Convention on Action against Trafficking in Human Beings, as well as the EU Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims. The eleven organisations belonging to the ATMG are:

AFRUCA (Africans Unite Against Child Abuse)
Amnesty International UK
Anti-Slavery International
Bawso
ECPAT UK
Focus on Labour Exploitation (FLEX)
Helen Bamber Foundation
Kalayaan
POPPY Project (of Eaves Housing for Women)
TARA project (Trafficking Awareness Raising Alliance, of Community Safety Glasgow (CSG))
UNICEF UK

In addition to this submission, the ATMG would like to refer the review to its previous published research reports, each of which comment on the impact of the terms of the Overseas Domestic Worker (ODW) visa, both pre- and post-April 2012, and make recommendations as to how the rights of domestic workers can be better protected. Please see ATMG reports; 'Wrong Kind of Victim?' (2010)[1], 'All Change: Preventing Trafficking in the UK' (2012)[2], and 'In the Dock' (2013)[3].

In 2014, the ATMG also published[4] an 'Alternative' Bill (entitled the 'Modern Slavery, Human Trafficking and Human Exploitation' Bill) to assist in the scrutiny and strengthening of the Modern Slavery Act 2015 in its passage through the Parliament. The provisions contained within this Alternative Bill are those which the ATMG feel are imperative for inclusion in comprehensive and world-leading anti-slavery legislation. Clause 19 of the Bill sets out the rights that overseas domestic workers should be entitled to, both those working in private households and those accompanying diplomats, as well as the obligations of their employers. The ATMG urges the UK government to ensure through UK law, policy and practice that, at a minimum, all of the rights and obligations listed in Clause 19 are, respectively, upheld and enforced.

[1] In particular, see pgs. 93 & 97
[2] See pgs. 10, 36 and 50.
[3] See pg. 52
[4] ATMG, 2014, 'Modern Slavery, Human Trafficking and Human Exploitation' Bill. http://www.antislavery.org/includes/documents/cm_docs/2014/a/atmg_modern_slavery_human_trafficking_and_human_exploitation_bill.pdf

a) Whether the arrangements for issuing Overseas Domestic Worker Visas are effective in protecting potential victims from abuse:

Lord Bates in his letter to Baroness Royall, dated 9th February 2015 (see attached), noted a number of immediate steps that the Government was to take to further protections for Overseas Domestic Workers (ODWs).

The first is a pilot visa interview programme in Africa to enable UKVI staff to speak to workers prior to the issuing of a visa. Whilst pre-departure interviews may be helpful for informing workers of their employment rights it is unlikely to have significant success in uncovering abuse. The worker is very unlikely to feel confident to speak out about the conditions that they are working under either for fear of retribution from their employer (they may even have been coached very clearly as to what they need to say to the authorities), or fear that disclosure may result in a visa not be issued (with dire consequences for the worker). They may have been driven to tolerate the conditions due to their financial vulnerability and need for employment or may have normalised this treatment due to prolonged abuse.

Moreover, Lord Bates' letter does not provide detail as to the steps that should be taken by UKVI staff if, through these interviews, abuse is identified or suspected. The inquirer must be in a position to support and protect the domestic worker is such cases, particularly if there is a risk that the abuser has been implicitly or explicitly alerted to what has been alleged. Regardless that the ATMG has reservations as to the potential success of such pre-departure arrangements in identifying abuse, it would have serious reservations about the UK implementing this pilot interview programme if effective support and protection mechanisms were not in place to assist victims of abuse.

The second is the introduction of a new, more comprehensive contract of employment between domestic worker and employer. This new contract, in Appendix 7 of the Home Office Immigration Rules[5], includes sections on holiday entitlement, accommodation and health insurance provision, and clearly states that the worker's passport should not be retained by their employer. It also states that their employer must pay them at least the minimum wage. Whilst this clear and more comprehensive statement of obligations and entitlements is a positive step, it will only be of benefit to the domestic worker if it is understood and enforceable. The post-April 2012 ODW visa (hereafter the 'post-2012 visa') creates an imbalance of power which removes the ability of the worker to negotiate better working conditions if the terms of the contract are not upheld. The domestic worker may theoretically be able to access the UKVI website which further details their employment rights in the UK[6] but this will in practice be used infrequently given English[7] and computer illiteracy rates amongst domestic workers and/or lack of access to a computer. Given the restrictive terms of the visa which ties them to their employer, it is also clear that workers on the post-2012 visa are not in practice able to access their employment rights as any attempt to do so is likely to lead to their dismissal and subsequent curtailing of their visa (see section (c)) .

The third measure introduced in Lord Bates' letter is a requirement for caseworkers issuing an ODW visa to 'be satisfied that the National Minimum Wage will genuinely be paid'. The letter does not

[5] Home Office, Immigration Rules- Appendix 7
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/422350/20150406_immigration_rules_appendix_7_final.pdf

[6] https://www.gov.uk/domestic-workers-in-a-private-household-visa/your-employment-rights

[7] Domestic workers may also be illiterate in their native language also, having never had the opportunity to read or write.

provide detail on how the caseworker should make this judgment and how this will be monitored once employment has begun. Home Office guidance for staff on the visas for Domestic Workers in Private Households, updated in April 2015, has a section on Human Trafficking which contains disappointingly scant information[8], merely stating that if human trafficking is suspected advice must be sought from a manager or single point of contact (SPOC) on human trafficking.

Kalayaan has suggested a number of sensible and cost-effective ways to ensure that employers are compliant with their obligations to pay worker's minimum wage[9]. This includes requiring that the worker have their own bank account, obliging employers to issue payslips and passing the details of employee and employer to HMRC to ensure that tax and NI contributions are being paid. All of these recognise the individual as a worker with associated labour rights, rather than a visitor to the UK.

When an ODW visa is issued, the domestic worker should be interviewed without their employer present. They should also be given a leaflet to inform them of their rights within the UK as a domestic worker. The below figures (in Table 1) from Kalayaan show that over the three years since the introduction of the new visa in 2012 just over half of their clients were interviewed when an application for their visa was made. Two-thirds had their employer present when they made an application, less than half had signed a contract, and only one in ten domestic workers were provided with information on their rights in the UK. It is also not clear what, if anything, is done with the information which is collected at interview, beyond making the decision as to whether a visa should be issued. **If staff do identify abuse indicators, there should be support procedures in place to assist the worker and protect them from further harm.**

Table 1. Application for Entry Clearance as an ODW (*Reports by ODWs to Kalayaan in 3-year period 6/4/2012- 5/4/2015)*

		% of total
Number of ODW interviewed for Entry Clearance	292 (n=529)	55%
Was employer present when application made in sending country?	Yes 303 (n=469) No 166 (n=469)	**Yes** - 65% **No** - 35%
ODW given information/ leaflet about rights?	Yes 54 (n=483) No 429 (n=483)	**Yes** - 11% **No** - 89 %
Did they sign a contract?	Yes 161 (n=358) No 48 (n=358) Unknown 149 (n=358)	**Yes** - 45% **No** - 13% **Unknown** - 42%

[8] Home Office guidance, Domestic workers in private households –v12.0, April 2015, see *p.* 33 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/422047/ODW_v12_0.pdf

[9] Kalayaan, May 2015, Britain's forgotten slaves; Migrant domestic workers in the UK three years after the introduction of the tied Overseas Domestic Worker visa. http://www.kalayaan.org.uk/wp-content/uploads/2014/09/Kalayaan-3-year-briefing.pdf

At the risk of contradicting the above recommendation about the need for workers to be informed of their rights in the UK, it is worth noting that this will only be of practical benefit to domestic workers if they do in fact have rights and there are protections available to them. If they are told that they cannot change employer, making clear that they are effectively tied to them, this information can only alert the domestic worker to their position of vulnerability and play into the hands of unscrupulous employers (see below for further detail).

b) Whether there is any evidence that the terms of the Visa, including the link to the specified employer, have led to the trafficking or slavery of domestic workers

The government does not collect any data which can provide an accurate answer to this question. NRM data alone is an inadequate measure given that the majority of adult victims (of all forms of trafficking) identified by authorities and service providers choose not to be referred into the NRM[10]. Moreover, even when the NRM data is combined with data from support organisations, such as Kalayaan, about the number of victims identified outside of the NRM (as reported in the NCA's strategic assessment[11]), this data also cannot be used as a measure to show whether the changes to the visa have led to an increase in the trafficking of migrant domestic workers. If, for instance, this data showed a reduction in the numbers of ODWs identified as trafficked since April 2012, both those referred to the NRM and those identified outside of the NRM, it may be more an indication that migrant domestic workers are unable or too fearful to approach the authorities or NGOs, due to the impact of the terms of the visa, than an indication of a reduction in the numbers being trafficked. In fact, support organisations *have* seen a reduction in the number of domestic workers who have registered with their service[12]. When a domestic worker on the tied visa approaches Kalayaan with reports of abuse there is little that the charity can do for them unless they are victims of trafficking and will consent to being referred into the NRM. If they do not consent and have left their employer they are at risk of being deported.

The only organisation which does systematically collect evidence to monitor the impact of the terms of the visa on migrant domestic workers is Kalayaan. Their published figures consistently show that those domestic workers who enter the UK on a tied visa suffer higher levels of abuse than those who enter the UK on the pre-2012 visa. As they have regularly stated, it is not that those on the pre-2012 visa are not trafficked and are not abused, they are, it is that those on the tied visa each and every year experience more abuse and are more likely to be identified by Kalayaan as trafficked.

To quote the statistics from Kalayaan's most recent briefing[13], in the three years between April 2012 and the end of March 2015 Kalayaan registered a total of 590 new workers. 184 of these workers were tied to their employers (*either because they entered the UK on the tied Overseas Domestic Worker visa, or because they entered in the employ of a diplomat*).

---

[10] The extent of those opting not to enter the NRM was made clear in the NCA baseline assessment in 2013 which reported that 60% of the number of potential victims identified in the assessment were not recorded on the NRM. In 2012 this figure was even higher at 65%. See http://www.nationalcrimeagency.gov.uk/publications/399-nca-strategic-assessment-the-nature-and-scale-of-human-trafficking-in-2013/file, para 21.

[11] For instance, see http://www.nationalcrimeagency.gov.uk/publications/399-nca-strategic-assessment-the-nature-and-scale-of-human-trafficking-in-2013/file

[12] *Supra* note 4. Kalayaan have reported such a reduction over the three years since the introduction of the tied visa in 2012.

[13] Supra note 4

Proportionally, the levels of abuse reported remain consistently higher for those on the tied visa compared with those who are not on the tied visa.

- 14% of workers tied by their visa to employers reported physical abuse, compared with 9% who were not tied
- 66% of tied workers reported being prevented from leaving the house freely, compared with 41% of those who had entered on the original visa.
- 81% tied workers reported having no time off compared to 66%
- Reports by workers tied to employers were that 31% were not paid at all, compared with 11% who were not tied
- 74% of workers who were tied reported having their passport kept from them, compared with 50% who were not tied
- Kalayaan staff internally identified 64% of the workers on a tied visa as trafficked, compared with 25% who were not tied

Kalayaan's evidence presents a clear picture that the tied visa facilitates trafficking and abuse. Their findings are supported by further research undertaken by other organisations, such as Human Rights Watch[14] and the Centre for Social Justice[15]. Indeed, even seven years ago parliamentarians had recognised and acknowledged the importance of the pre-2012 visa in protecting domestic workers. The Home Affairs Select Committee on human trafficking in 2009 stated 'to retain the Migrant Domestic Worker visa and the protection it offers workers is the single most important issue in preventing the forced labour and trafficking of such workers'.[16]

There are parallels between the UK's current domestic worker visa system and the kafala system of sponsorship found in certain Middle Eastern countries. The kafala system links the individual's work permit to a single person, the 'sponsor', who is usually the employer. The worker is not allowed to leave their employer or leave the country without their employer's consent. Numerous pieces of research[17] have been undertaken to show that this kafala system, combined with a lack of labour laws, enables unscrupulous employers to exploit and abuse domestic workers. Regular calls are made from non-governmental organisations for reforms to be made to the kafala system.

States themselves have used international human rights machinery to openly criticise the kafala system. This includes the UK, who used the opportunity presented by the most recent Universal Period Review of Qatar[18] to urge the state to '[r]eform the sponsorship system, removing the

---

[14] Human Rights Watch, 2014*, Hidden Away: Abuses Against Migrant Domestic Workers in the UK* http://www.hrw.org/sites/default/files/reports/uk0314_ForUpload.pdf

[15] 'It happen Here', 2012, p. 92

[16] Home Affairs Committee, The Trade in Human Beings: Human Trafficking in the UK. Sixth report of session 2008–9, Volume 1. House of Commons, p26

[17] Amnesty International, 2014, *My sleep is my break* http://www.amnesty.org.uk/webfm_send/358; Anti-Slavery International, 2014, *Into the Unknown* http://www.antislavery.org/includes/documents/cm_docs/2014/i/into_the_unknown_report.pdf; Human Rights Watch, 2014, *I Already Bought You: Abuse and Exploitation of Female Migrant Domestic Workers in the United Arab Emirates* http://www.hrw.org/node/129798; International Labour Organization, 2014, *Women migrant domestic workers in the Arab States: An annotated bibliography*, http://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/projectdocumentation/wcms_236688.pdf

[18] OHCHR Universal Periodic Review. Second Cycle – Qatar http://www.ohchr.org/EN/HRBodies/UPR/Pages/QASession19.aspx

requirement for foreign workers to obtain permission before…moving jobs'[19]. Given the similarities between the kafala system and the current domestic worker visa in the UK, in that both tie the worker to their employer creating power imbalance that facilitates abuse, the ATMG noted this recommendation with surprise. The UK also further recommended to the state of Qatar to '[r]eform labour laws to ensure that domestic workers are legally protected and improve the enforcement of those laws'[20]. The ATMG hopes that the UK will heed its own recommendations to the state of Qatar and not only change the terms of the visa to allow domestic workers to change employers and recognise the domestic worker as a worker, but also introduce measures to ensure that the terms of their employment contract are upheld.

c) Whether the policies or processes for (i) identifying and (ii) providing support to victims of modern slavery amongst those who entered the country on an ODW visa are effective.

Since the introduction of the tied domestic worker visa in April 2012, the number of domestic workers registered with Kalayaan has fallen (by approximately a third) whilst the number of domestic worker visas issued has remained relatively stable, with a small rise seen in 2014.[21] Furthermore, the numbers of those registered on the tied domestic visa who have gone to the authorities has also fallen[22]. Research found that the principle reasons for these reductions is fear and restrictions in freedom and movement (an increase in which has been seen since the visa change in 2012[23]); a domestic worker on the tied visa who leaves their employer, often without documentation and access to financial resources, is in breach of the immigration rules and is at risk of deportation. They are at risk of being criminalised for attempting to escape the abuse they have been subjected to.

If a worker on a tied visa approaches Kalayaan there is little in reality that the charity can do to support them; they can advise them to go to the police, which may result in them being penalised for breaching the immigration rules, or enter the NRM, which will prevent them being unable to work and send money home. Given these limited options, it is unsurprising that domestic workers go underground to find alternative employment in order that they may continue to earn money.

Clause 53 of the Modern Slavery Act 2015 changes little in practice for ODWs, compared to what is currently available for them under the NRM. The similarities between the protections and entitlements available through the NRM and the 'Commons amendment in lieu' (now Clause 53) was compared in a briefing written by the Immigration Law Practitioners Association (ILPA) for the 'Ping Pong' debate on the Modern Slavery Act 2015 in the House of Lords on 23rd March 2015.[24] The protections are the same, if not less, as a result of the changes made to the immigration rules by Clause 53. If the domestic worker is recognised as a victim of modern slavery through the NRM they

[19] *Ibid*, para. 124.72
[20] *Ibid*, para. 124.84
[21] Home Office figures show that 16,528 ODW visas were issued in 2013; 15,745 in 2012; 16,187 in 2011; 15,351 in 2010; and 14,887 in 2009, according to data obtained through freedom of information request (see https://www.opendemocracy.net/beyondslavery/kate-roberts/modern-slavery-bill-migrant-domestic-workers-fall-through-gaps). The figure rose slightly in 2014 to 16,753 (see http://www.kalayaan.org.uk/wp-content/uploads/2014/09/Kalayaan-3-year-briefing.pdf).
[22] Only 63 of the 214 domestic workers that Kalayaan identified as trafficked consented to be entered into the NRM and only 25 agreed to report their abuse to the police. See http://www.kalayaan.org.uk/wp-content/uploads/2014/09/Kalayaan-Briefing-for-Commons-MSB-17.3.15.pdf for further information.
[23] *Supra* note 4
[24] ILPA Briefing, 25 March 2015,Modern Slavery Bill Ping Pong – House of Lords http://www.ilpa.org.uk/resources.php/30835/ilpa-briefing-for-modern-slavery-bill-ping-pong-house-of-lords-overseas-domestic-workers-25-march-20

will only be allowed one, six-month visa to find new employment. Aside from the fact that six months is often too short a period for the worker to secure new employment (particularly if their new employer is looking for someone trusted to care for a young or vulnerable relative), it is also shorter than the one years' discretionary leave that they are currently entitled to following a positive conclusive NRM decision during which they are not restricted to finding employment only in the domestic work sector. There is therefore no reason to think that more ODWs will now chose to come forward as a result of these changes, as was argued by the Minister for Modern Slavery.[25] Furthermore, referral into the NRM for adults is be made on an informed and voluntary basis. The immigration rules now negate the principle of informed consent by forcing the domestic worker to enter the NRM in order to access protections.

The changes brought in through Clause 53 will provide limited benefit to only a small proportion of all overseas domestic workers, those who have been trafficked. It will be of no benefit to those workers who have not been trafficked but who have nevertheless suffered abuse, for instance those who are raped by their employer. If they are not eligible to receive a positive conclusive NRM decision as a victim of trafficking they are left with the choice of leaving and breaching the immigration rules or remaining as the employee of their rapist.

It is again worth highlighting that the current visa and Clause 53 do nothing to **prevent** modern slavery and abuse of domestic workers. A domestic worker can only change employer *after* exploitation has taken place.

d) Whether the policies and processes for pursuing those accused of perpetrating modern slavery offences against those on an Overseas Domestic Workers Visa are effective

There has only been one conviction of an employer of an ODW, prosecuted under the offence of slavery[26], which occurred prior to the visa change in 2012. No one has ever been successfully prosecuted in the UK for the *trafficking* of an ODW. Given this record it is clear that the policies and processes to successfully pursue perpetrators are not effective.

Firstly, as with all trafficking cases, a successful prosecution is reliant in large part to the testimony of the trafficking victim. As Kalayaan's figures have shown, fewer domestic workers are coming forward and registering with the charity since the introduction of the tied visa. A domestic worker who is concerned about their immigration status may make a less reliable witness than one who does not have such concerns.

In rejecting Amendment 72 voted in by the House of Lords, the government argued that allowing ODWs to change employer without notifying the authorities would enable their employers to go on to abuse others[27]. Firstly, it is important to note that domestic workers who came into the UK on the pre-2012 ODW visa **would** have notified the Home Office when they changed their employer. It was recommended for those on the visa to tell the Home Office when they left the employer and provide the reasons for this. Even if the worker didn't follow this recommendation, they would still come to the attention of the Home Office when they applied to renew their visa when starting new employment. Contrary to the government's argument the Home Office may in fact now have less of

[25]HC Debate 17 Mar 2015 : Column 681
http://www.publications.parliament.uk/pa/cm201415/cmhansrd/cm150317/debtext/150317-0002.htm
[26] R v Balira at Southwark Crown Court, August 2011 http://www.thelawpages.com/court-cases/Rebecca-Siima-Balira-7236-1.law
[27] HC Hansard 17 Mar 2015 : Column 647
http://www.publications.parliament.uk/pa/cm201415/cmhansrd/cm150317/debtext/150317-0001.htm#15031750000002

a grasp of the movements of ODWs in the UK than they did pre-2012, when ODWs could change employer.

Secondly, there is little reason to believe that the government's amendment in lieu of Amendment 72 (now Clause 73 of the Act) will result in a greater number of prosecutions of exploitative employers. The Minister in introducing the new clause made the following, somewhat contradictory statement:

'I want victims to provide information that enables us to catch the perpetrators and increase the number of prosecutions. However, when somebody comes forward and is referred to the national referral mechanism, it does not require the involvement of the police at any point in the process.'[28]

The question remains whether a referral into the NRM is necessary to achieving the aim of increasing prosecutions? There is no evidence to suggest that a positive NRM determination improves the chances of a successful prosecution[29], and information-gathering on abusive employers can take place outside of the NRM. A domestic worker could still notify the authorities if they changed employer and voluntarily provide their reasons for doing so if they wished. This would remove their dependence on a system (the NRM) that they may not have independently chosen to enter otherwise.

There is also a danger that this reliance of a positive NRM decision could be used against the domestic worker in criminal cases. If this is requisite before changing employers, the argument could be made that a domestic worker has an inducement to making an NRM referral, exaggerate their exploitation and/or make a false claim. This can only serve to exacerbate the culture of disbelief that currently exists.

With respect to diplomats who traffick domestic workers, their diplomatic immunity continues to shield them from prosecution thus perpetuating impunity across this group. The recent Court of Appeal judgement handed down in the case of Reyes & Anor v Al Malki[30], in which a trafficked domestic workers right to recourse through the employment tribunals was trumped by their employer's diplomatic immunity, further confirms this. To protect domestic workers employed by diplomats they must also be allowed to change their employer (without the need to have first received a positive NRM decision). The ATMG would also recommend that the domestic worker is employed by embassies rather than individual diplomats. Given the judgement in the recent landmark Court of Appeal Case of Benkharbouche & Janah vs Sudan & Libya[31], this may facilitate greater access to justice.[32]

e) The need to maintain the integrity of the immigration system

---

[28] HC Hansard, 17 Mar 2015 : Column 667
http://www.publications.parliament.uk/pa/cm201415/cmhansrd/cm150317/debtext/150317-0002.htm

[29] See ATMG, 'In the Dock', *p*.54. This was also highlighted by Parosha Chandran, a leading barrister and recognised expert in the field of human trafficking, in Anti-Slavery International's 'Ping Pong' briefing in the Modern Slavery Act debates, available here:
http://www.antislavery.org/includes/documents/cm_docs/2015/m/ms_bill_ping_pong_briefing_antislavery_international.pdf In particular, see Para. 9.

[30] Reyes & Anor v Al-Malki & Anor [2015] EWCA Civ 32
http://www.bailii.org/ew/cases/EWCA/Civ/2015/32.html

[31] Janah v Libya; Benkharbouche v Embassy of the Republic of Sudan [2015] EWCA Civ 33
https://www.judiciary.gov.uk/wp-content/uploads/2015/02/benkharbouche-and-janah-v-embassy-republic-sudan-others.pdf

[32] The court upheld the Claimants' declaration that there was an incompatibility between the State Immunity Act 1968 and their EU law rights, in order that the workers could make a claim.

The pre-2012 ODW visa did not undermine the integrity of the immigration system. Instead it provided a safer migration route which recognised ODWs as workers and allowed them to apply to renew their visa only if they remained in full time employment as a domestic worker in a private household without recourse to public funds. The route also provided them with some protection under UK employment law, allowing them to change employer (but not the type of employment) without losing their immigration status.

Conversely, the post-2012 visa has undermined the integrity of the UK immigration system by removing the protections that are recognised internationally as best practice by such bodies as the International Labour Organisation (ILO)[33] and the Special Rapporteur on the Human Rights of Migrants[34] (2010). Indeed it has produced a position, as is said earlier in this response, akin to that the UK is criticising of others. The current 6-month non-renewable visa makes it clear to the worker and the employer that, in spite of any contracts requested when applying for entry clearance, the workers is in practise a short-term visitor in the UK who is tied to the individual named in their passport. It is unsurprising then that some domestic workers who find themselves in an abusive employment relationship choose to go under the radar of the immigration authorities to find alternative employment.

[33] Draft ILO Multilateral Framework on Labour Migration. *Non binding principles and guidelines for a rights-based approach to labour migration*, Geneva, 31 Oct- 2 Nov 2005. Annex II '*Examples of best practise, VI Prevention of and protection against abusive migration practises*', pt 82.

[34] Report of the Special Rapporteur on the human rights of migrants, Jorge Bustamante, 2010. 'Mission to the United Kingdom of Great Britain and Northern Ireland'. Available: http://www2.ohchr.org/english/bodies/hrcouncil/docs/14session/A.HRC.14.30.Add.3_en.pdf