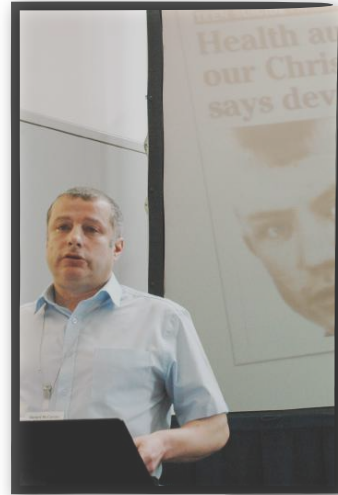


Shadow Report to the United Nations Committee on Economic, Social and Cultural Rights' examination of the United Kingdom's 6th Periodic Report

Participation and the Practice of Rights (PPR)

August 2015



EXECUTIVE SUMMARY



The **Participation and the Practice of Rights (PPR)** organisation was established in 2006 and works in Northern Ireland to support disadvantaged groups to assert their right to participate in social and economic decisions which affect their lives. This approach of grassroots monitoring developed and used by PPR and its participant groups was cited by the Office of the High Commissioner for Human Rights as “**an example of how people can effectively use indicators to claim their rights**” in 2012.

PPR are concerned by the **significant omissions in the State Party’s report**, both in relation to the impacts of government policy on the enjoyment of rights generally and the absence of specific information related to Northern Ireland.

PPR has compiled a list of suggested questions the Committee may wish to ask and a list of suggested recommendations which the Committee may wish to consider in developing its report. These are summarised below. PPR intend the following submission to be relevant to the Pre- Sessional Working Group List of Issues stage and the main examination.

Reporting on Northern Ireland:

Suggested Question:

- The Committee may wish to request that the UK government supply specific information on the impact of policies in Northern Ireland under each of the articles contained in the Covenant and/or under each of the Committee’s recommendations issued in the Concluding Observations.

The Right to Work (Article 6):

Suggested Questions:

- The Committee may wish to ask the UK government how the NI Executive plans to tackle unemployment, with particular emphasis on groups which are disproportionately impacted by long term unemployment and youth unemployment.
- The Committee may wish to ask the UK Government how the Northern Ireland Executive is ensuring public procurement practices are harnessed to address deprivation and create jobs for the most vulnerable, particularly the long term unemployed.

Suggested Recommendation:

- The Committee may wish to recommend that government adopt innovative measures on procurement such as the Real Jobs Now model
- The Committee may wish to recommend that the Northern Ireland Executive ensure that measures to encourage investment gives due priority to marginalised groups living in areas of longstanding deprivation.

The Right to Social Security (Article 9):

Suggested Questions:

- The Committee may wish to ask the UK Government how the Northern Ireland Executive is ensuring that the application of social security sanctions are not interfering with people’s right to a minimum essential level of benefits.

- The Committee may also wish to ask what measures will be put in place to ensure vulnerable groups are protected in any future changes to social security which may take place in Northern Ireland.

The Right to the Widest Possible Protection and Assistance to the Family (Article 10(1)):

Suggested Recommendation:

- The Committee may wish to recommend that measures put in place to address domestic violence such as non-molestation orders, are rigorously monitored, with targets set against them to ensure they are appropriate and effective.

The Right to Adequate Housing (Article 11):

Suggested Question:

- The Committee may wish to ask the UK Government and the Northern Ireland Executive what measures it has in place to ensure that public land use respects, protects and fulfils the right to adequate housing, for disadvantaged groups.

Suggested Recommendations:

- The Committee may wish to recommend inequalities facing disadvantaged groups such as Catholics in North Belfast are appropriately identified, including the use of residuary methods in line with best practice.
- The Committee may wish to recommend that the Northern Ireland Executive use its available powers to take steps to ensure that land capable of realising the right to adequate housing, particularly for disadvantaged groups such as Catholics in north Belfast, is used for such purposes.

The Right to the Highest Attainable Standard of Health (Article 12):

Suggested Recommendations:

- The Committee may wish to recommend that steps are taken to ensure that adequate follow up arrangements are put in place for mental health patients who seek treatment at Emergency Departments. Such steps should include effective 'sectioning' protocols implemented in timely manner which includes the training of medical professionals.
- The Committee may wish to recommend that the Northern Ireland Executive take steps to adequately resource mental health care in Northern Ireland in accordance with the level of need, paying particular attention to the mental health needs of vulnerable groups.

The Right to Education (Article 13):

Suggested Recommendation:

- As a matter of urgency, the State Party should provide culturally appropriate diagnostic and support provisions for children and young people with Special Education Needs within the Irish Medium Education sector.

For further information on this submission, please contact:

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INTRODUCTION



Participation and the Practice of Rights (PPR)

Participation and the Practice of Rights (PPR) was established in 2006 works in Northern Ireland to support disadvantaged groups to assert their right to participate in social and economic decisions which affect their lives.

PPR currently works with **grassroots groups in economically deprived areas of Northern Ireland (NI)** on issues relating to the implementation of rights under the International Covenant on Economic, Social and Cultural Rights (ICESCR) such as the right to adequate housing (Art 11), the right to work (Art 6), the right to social security (Art 9) and the right to the highest attainable standard of health (Art 12). PPR has also recently started working with grassroots groups on the right to the widest possible protection and assistance to the family (Article 10(1)) as well as the right to education (Article 13).

Grassroots Monitoring of progressive Realisation

“It’s the way in which human rights work should be, but isn’t done”

Mary Robinson, Former UN High Commissioner for Human Rights speaking on the work of PPR in 2013.

This report will provide a grassroots viewpoint on how the policies and practices in place in Northern Ireland are performing to realise economic, social and cultural rights in the most deprived communities in Northern Ireland. PPR concentrates our work in deprived areas of Northern Ireland, mainly in North and West Belfast which according to government figures make up the 18 of the 20 most deprived areas in Northern Ireland. These are the areas which also suffered the highest number of deaths during the 30 year conflict which took place in Northern Ireland between 1969 - 1998.

Each of the groups supported by PPR make practical use of the articles in the ICESCR and the related General Comments in their work to monitor if these standards are being made real in their own communities. They have used these standards as the basis for **developing and monitoring grassroots human rights indicators and benchmarks** to assess if their economic and social rights are being made real on the ground. As the groups are all located in communities which are amongst the most disadvantaged in Northern Ireland, **their work also tests whether government is successfully according ‘due priority’ to vulnerable groups** as required by the Committee’s General Comments. The unique aspect of

this work is that progressive realisation is being defined and monitored by people affected by human rights violations rather than national governments.

This approach of grassroots monitoring developed and used by PPR and its participant groups was cited by the Office of the High Commissioner for Human Rights as “an example of how people can effectively use indicators to claim their rights” in 2012.¹

Reporting on Northern Ireland

PPR has reviewed the information supplied in the State Party’s report to the Committee, providing factual comments on a draft document during the Ministry of Justice’s development of the Periodic Report.²

PPR wish to draw the Committee’s attention to **specific gaps in information relating to Northern Ireland in the State Party’s report and the State Party’s divergence from the revised CESC Reporting guidelines.**³ Both these factors limit the detail provided by the State Party on the impact of government measures on the enjoyment of Covenant rights (especially in Northern Ireland), despite such detail having been emphatically requested in the revised CESC reporting guidelines.

Such **gaps and omissions** include:

- Despite the Committee’s 2009 Concluding Observation regarding unemployment particularly for disadvantaged and marginalised groups⁴, no reference is made to the impact of these issues in Northern Ireland in the State Party’s report. The information provided (paragraph 31) runs to one sentence and is exclusively regarding youth unemployment and is restricted to the naming of two strategies with no assessment of impact.
- No detail is given in the State Party report regarding the impact of efforts made to combat violence against women. Comments relevant to Northern Ireland are restricted to the reference to the Northern Ireland Executive’s action plan to tackle domestic and sexual violence and abuse (paragraph 40).
- The State Party’s report is limited in its reference to housing policy in Northern Ireland. Information provided is restricted to the naming of the ‘Facing the Future’ housing strategy and the Social Housing Reform Programme (paragraph 54).

¹ OHCHR (2012) “Human Rights Indicators: A Guide to Measurement and Implementation” “Human Rights Indicators: A Guide to Measurement and Implementation” For further, please see <http://www.ohchr.org/EN/NewsEvents/Pages/IndicatoressentialtoolsinrealizationofHR.aspx>

² Please see PPR submission to Ministry of Justice (May 2014), ‘Factual Comments on the report draft from the Participation and the Practice of Rights organisation, Northern Ireland’, available at <http://pprproject.org/sites/default/files/PPR%20Factual%20Comments%20to%20MOJ%20re%20periodic%20report%20to%20CESCR.pdf>

³ Guidelines on Treaty Specific Documents to be submitted by State Parties under Articles 16 and 17 of the International Covenant on Economic, Social and Cultural Rights (March 2009) UN Doc E/C.12/2008/12

⁴ Concluding Observations of the Committee on Economic, Social and Cultural Rights, United Kingdom of Great Britain and Northern Ireland, the Crown Dependencies and the Overseas Dependent Territories (June 2009) UN Doc E/C.12/GBR/CO/5 para.20

- Additionally, the State Party report entirely omits any reference to the Committee's 2009 concern regarding the chronic shortage of housing for Catholic families in North Belfast.⁵
- No detail relevant to Northern Ireland is presented in the State Party's report regarding the impact of measures taken to reduce suicides or ensure improved access to the complaints process, despite the Committee's 2009 concerns regarding these issues.⁶ Information provided specific to Northern Ireland is restricted to the naming of the Suicide Prevention strategy (paragraph 78).
- Despite the Committee's 2009 Concluding Observation that immediate steps should be taken to address regressive funding in mental health service, no information is presented relevant to Northern Ireland in this section of the State Party's report (paragraphs 66–69).

The Committee may also wish to be made aware that since the publication of the 2009 Concluding Observations, PPR has written to the Office of the First and Deputy First Minister in Northern Ireland asking for information on how the NI Executive are progressing the Committee's recommendations on three occasions. Despite some information having been supplied to a resident in the Equality Can't Wait campaign following the Committee's initial examination in 2009⁷, no useful information in relation to the Concluding Observations has been received.⁸

Suggested Question:

- **The Committee may wish to request that the UK government supply specific information on the impact of policies in Northern Ireland under each of the articles contained in the Covenant and/or under each of the Committee's recommendations issued in the Concluding Observations.**

This Report's Structure

This report is structured by the relevant Covenant article, providing detail on the impact of NI Executive measures on the enjoyment of Covenant rights as well as the information contained in the State Party report pertaining to Northern Ireland and the relevant gaps in information provided by the State Party.

Each section also provides evidence from the work of PPR groups who are engaged in human rights monitoring using human rights indicators and benchmarks. This information should be helpful to the Committee in assessing the State Party's fulfilment of Article 2 obligations to progressively realise Covenant rights in Northern Ireland, to the maximum of its available resources.

An Executive Summary is also included at the beginning of this report.

⁵ Ibid., Para. 29

⁶ Ibid., Para 35

⁷ Correspondence from the Department for Social Development dated 18th June 2009 to Ms Angie McManus relating to housing queries raised in correspondence from Ms McManus to OFMDFM following the Committee's 2009 examination.

⁸ PPR Correspondence to OFMDFM dated 30th January 2012, 11th February 2014 and 10th March 2014.

The Right to Work (Article 6)

KEY ISSUES:
**ACCESS TO EMPLOYMENT FOR DISADVANTAGED
GROUPS & GOVERNMENT 'BACK TO WORK' SCHEMES**



Unemployment

In 2009, the CESCR Concluding Observations noted the levels of unemployment and recommended that the State Party “strengthen its measures to reduce the substantial number of unemployed persons and to counteract the impact of the economic downturn on employment in order to implement fully the right to work, in particular with regard to the **most disadvantaged and marginalized individuals and groups** (emphasis added)”.⁹

Despite this, there remains persisting issues with unemployment in Northern Ireland particularly for disadvantaged and marginalised groups. According to government figures, the overall unemployment rate is 6.5% in Northern Ireland which is slightly higher than the UK rate of 5.6%.¹⁰

According to the Office of National Statistics (April 2015) the highest levels of unemployment in Northern Ireland are concentrated in the constituencies of Foyle, North Belfast and West Belfast¹¹. These constituencies, which suffered the most deaths and highest levels of social and economic deprivation during the conflict, were noted in the same statistics as the areas with the 2nd, 5th and 6th highest rate of unemployment across all 650 UK constituencies.

Government figures also capture different experiences of unemployment by gender and religious background.

⁹ Concluding Observations of the Committee on Economic, Social and Cultural Rights, United Kingdom of Great Britain and Northern Ireland, the Crown Dependencies and the Overseas Dependent Territories (June 2009) UN Doc E/C.12/GBR/CO/5 para.20

¹⁰ (DETINI) Labour Force Survey, August 2015, accessed at: http://www.detini.gov.uk/index/what-we-do/deti-stats-index/labour_market_statistics/stats-labour-market-unemployment.htm

¹¹ Statistics from a comparison of the Office of National Statistics (ONS) Claimant Count data for Parliamentary Constituency (April 2015) and Department for Enterprise Trade and Investment (DETINI) Claimant Count data also by Parliamentary Constituency for the same period

According to a 2014 government statistics bulletin which focussed on women and the labour market, the experience of those not in employment in Northern Ireland differ by gender¹². Whilst the employment rate for women aged 16–64 in Northern Ireland, at 63.9% is lower than the male rate at 72.8%; the **male unemployment rate of 8.4% is almost double the female unemployment rate of 4.1%**. Despite lower levels of employment therefore, women are less represented in unemployment figures than males. This is explained through women's higher representation in economic activity statistics, with the same statistics referencing a 33% rate of economic inactivity for women compared to a 20% rate for men. Additionally, different experiences of unemployment according to religious background are also recorded in government statistics. According to a 2013 government statistics bulletin which focussed on religion and the labour market, **Catholic males continue to be more impacted by unemployment than their Protestant counterparts** with 13% of Catholic men unemployed compared to 8% of Protestant males¹³. Additionally, the same statistics identify that in the Catholic community, greater numbers of the unemployed are long term unemployed (56%) than in the Protestant community (46%).¹⁴

In addition, long term unemployment (defined as being unemployed for one year +) and youth unemployment have worsened significantly in Northern Ireland since the Committee last examined the United Kingdom. According to statistics produced by the Department for Enterprise, Trade and Investment for Northern Ireland, **the percentage of 18–24 year olds unemployed has risen from 14.8% in the period January – March 2009 to 21.8% in the same period of this year**¹⁵.

The statistics for the same period also show **the incidence of long term unemployment to have doubled**, with the percentage of those who are unemployed having been so for one year or more rising from 29.9% to 62.1%.¹⁶ Research shows that that the longer an individual is out of employment the more difficult it is to return to the labour market.

Grassroots monitoring

Since the summer of 2012, PPR has been working with people who are out of work and in receipt of social security payments. The **Right To Work: Right to Welfare**

¹² (DETINI) Labour Market Statistics Bulletin, Women in Northern Ireland (September 2014) accessed at: http://www.detini.gov.uk/women_in_northern_ireland_2014.pdf?rev=0

¹³ (OFMDFM, 2014) Labour Force Religion Report 2013, Table A5.4 Unemployment Rates by Gender. Accessed at: <http://www.ofmdfmni.gov.uk/labour-force-religion-reports>

¹⁴ (OFMDFM, 2014) Labour Force Religion Report 2013, Table A5.6 Numbers Unemployed Short term or Long term. Accessed at: <http://www.ofmdfmni.gov.uk/labour-force-religion-reports>

¹⁵ (DETINI) Labour Force Survey Key Data Historical Series 1995– Present, Unemployment by Age Table 3.9, accessed at: http://www.detini.gov.uk/index/what-we-do/deti-stats-index/labour_market_statistics/labour_force_survey.htm

¹⁶ (DETINI) Labour Force Survey Key Data Historical Series 1995– Present, Unemployment by Duration Table 3.10, accessed at: http://www.detini.gov.uk/index/what-we-do/deti-stats-index/labour_market_statistics/labour_force_survey.htm

(R2W) Group¹⁷ has surveyed 388 unemployed people outside seven social security offices since 2012. In March 2013, 72% of those surveyed outside local jobcentres viewed themselves as fit and able to work but had been unemployed for over one year. One year later in March 2014, there had been little improvement with 69% of those surveyed reporting the same.

Suggested Question:

- **The Committee may wish to ask the UK government how the NI Executive plans to tackle unemployment, with particular emphasis on groups which are disproportionately impacted by long term unemployment and youth unemployment.**

State measures to address unemployment

Government ‘back to work’ schemes require an unemployed person’s participation as a condition of their social security payment. Unemployed people are required to work for up to 35 hours per week for which they receive £15 per week in addition to their benefits. In Northern Ireland the main ‘back to work’ scheme is called ‘Steps to Success’ which recently replaced the scheme known as ‘Steps to Work’.

According to an official evaluation of the Steps to Work scheme commissioned by the Department for Employment and Learning in Northern Ireland, the scheme met the performance target of 25% of participants sustaining employment for 13 weeks.¹⁸

Despite this, in March 2013, **the R2W Group’s surveying of 163 people only 5% of those who had participated in a government ‘back to work’ scheme such as ‘Steps to Work’ or ‘Steps to Success’ secured a job** as a result of their participation. In March 2014, the R2W monitoring indicated that such marginal success had reduced further with only 3.8% securing employment as a result of participation in the scheme. The ineffectiveness of government ‘back to work’ schemes was also highlighted by the UK House of Commons Work and Pensions Committee in their 2013 report which stated that such schemes were “unlikely to reach the most disadvantaged long term unemployed people.”¹⁹ According to Department for Work and Pensions information in 2013, only 3.2% of ‘back to work’ scheme participants in England had secured jobs.²⁰

¹⁷ In January 2014, then UN Special Rapporteur on extreme poverty and human rights, Magdalena Sepúlveda Carmona referred to the work being done by the R2W Group to hold the government accountable as ‘crucial’ and ‘promising practice to be followed’.

¹⁸ (DELNI) Steps to Work, Evaluation of the Steps to Work Programme, February 2012 p.152 accessed at: <http://www.delni.gov.uk/steps-to-work-evaluation.pdf>

¹⁹ (House of Commons Work and Pensions Committee) May 2013, Report accessible at: <http://www.publications.parliament.uk/pa/cm201314/cmselect/cmworpen/162/16202.htm>

²⁰ Please see ‘Work programme creates just 48,000 long-term jobs in three years’ Guardian newspaper, 21st March 2014 accessed at: <http://www.theguardian.com/society/2014/mar/21/work-programme-creates-48000-long-term-jobs-three-years>

Inward Investment Patterns and Job Creation

Invest NI is the public body responsible for attracting inward investment and business development in Northern Ireland. It should play a critical role in terms of providing a framework and incentives to create economic opportunity and outcomes for areas historically neglected by pre-Good Friday/Belfast Agreement economic policy. However, **17 years after the signing of the Agreement, the same areas of Northern Ireland remain the most deprived.** Government statistics show that 32 of the top 50 most deprived areas in Northern Ireland are in North and West Belfast, and 12 in Foyle, surrounding the city of Derry/Londonderry. Previous patterns of uneven investment and economic development also persist.

According to government figures in the three years from 2011 to 2014 Invest NI provided £211.4m of investment assistance to the Belfast area. North Belfast received £17.4m (8%) and West Belfast received £11.5m (5%) while East Belfast received £54.3m (26%) and South Belfast received £128.2m (61%). In terms of job creation 830 (14%) of jobs were created in North Belfast and 451 (7%) jobs created in the West of the city, whereas 2160 (36%) jobs created in East Belfast and 2570 (43%) in the South. Unequal distribution of resources exists across Northern Ireland. Foyle has received £25.6 million Investment assistance from Invest NI from 2011 to 2014, £185.8 million less than Belfast's overall total.

An April 2013 report by the NI Assembly's Public Accounts Committee criticised Invest NI as they provided "no measurement of how many people living in disadvantaged areas gain employment in supported projects". They recommended that "Invest NI's current target for promoting inward investment in disadvantaged areas needs to be strengthened significantly" and they must "consider redressing the geographic imbalance in financial assistance offers made to investing companies".

Suggested recommendation:

- **The Committee may wish to recommend that the Northern Ireland Executive ensure that measures to encourage investment gives due priority to marginalised groups living in areas of longstanding deprivation.**

Public Procurement and Job Creation – The 'Real Jobs Now' clause



Alongside inward investment, in these times of austerity every opportunity must be taken to make use of the 'maximum available resources' to implement the right to work and create jobs. In light of the evidence provided by both these human rights indicators the **R2W Group worked with PPR to develop a proposal which could realise rights by developing models of job creation targeted at disadvantaged groups.**

Using international human rights and local equality standards, the R2W Group and PPR presented a proposal to Belfast City Council which aimed to ensure that the Council's £40 million annual procurement budget ring fenced fully paid jobs and apprenticeships for the long term unemployed. The R2W campaign which galvanised the support of long term unemployed people themselves, political

parties and community organisations ensured that the proposal, known as the ‘REAL JOBS NOW! Social clause’ was passed by political parties at Belfast City Council in February 2014.²¹ The REAL JOBS NOW proposal distinguished itself from typical government procurement clauses in that it required three things; that inclusion of the REAL JOBS NOW be included at every available opportunity in Council contracts; that fully paid jobs (not ‘back to work’ placements) and apprenticeships for the long term unemployed be provided; and that adherence to the REAL JOBS NOW clause be a contract condition.

Despite the innovative approach taken by the R2W Group and the political support for the REAL JOBS NOW social clause, there has been resistance to the implementation of the human rights and equality standards contained in the proposal. For example, from the limited information available to the R2W Group it is clear that a £10 million investment from Belfast City Council at the redevelopment of the Girdwood site in North Belfast has only resulted in four jobs for the long term unemployed.

Suggested Question:

- The Committee may wish to ask the UK Government how the Northern Ireland Executive is ensuring public procurement practices are harnessed to address deprivation and create jobs for the most vulnerable, particularly the long term unemployed.

Suggested Recommendation:

- The Committee may wish to recommend that government adopt innovative measures on procurement such as the Real Jobs Now model

The Right to Social Security
(Article 9)

KEY ISSUES:
THE IMPACT OF THE USE OF SANCTIONS AND BARRIERS TO ACCESS AN EFFECTIVE REMEDY FOR VULNERABLE GROUPS



In 2009, the Committee noted its concerns that pension entitlements do not provide the most disadvantaged and marginalised groups with an adequate standard of living.²² This concern is addressed in the State Party’s report to the

²¹ For further on the R2W campaign for REAL JOBS NOW! please see PPR website, accessible at: www.pprproject.org/right-to-work

²² Concluding Observations of the Committee on Economic, Social and Cultural Rights, United Kingdom of Great Britain and Northern Ireland, the Crown Dependencies and the Overseas Dependent Territories (June 2009) UN Doc E/C.12/GBR/CO/5 paragraph 23.

Committee. However, not referred to in the State Party report is information about the impact on access to social security for the most vulnerable of the Welfare Reform policy agenda.

PPR echo the concern of many civil society organisations about the impact of 'Welfare Reform' on the most vulnerable. PPR support the evidence to the Committee on such matters in submissions from organisations such as the Committee on the Administration of Justice (CAJ).

Sanctions

The Committee may wish to be aware that despite the full extent of such measures having yet to be realised in Northern Ireland, there has been **increased incidence of problems in accessing social security payments as a result of benefit changes and/or sanctions**.²³ Sanctions are used as a punitive measure against social security claimants who do not meet the conditions of the benefit they are claiming.

In March 2013, 39% of jobseekers who took part in R2W monitoring outside Social Security Offices indicated that their access to social security payments had been interrupted or stopped as a result of a change in benefit or sanction. By March 2014, R2W Monitoring indicated that the incidence of sanctions had risen amongst those surveyed to 50%.

As a consequence of a sanction, an individual's access to social security entitlement can be reduced or denied for up to three years. As a result, the impact of sanctions and other changes to benefit entitlement is not only relevant to the right to social security, but also to other Covenant rights since often **it leaves vulnerable claimants without access to a "minimum essential level of benefits"**²⁴. The Trussell Trust for example, note in their 2014 report that 49% of people referred to food banks are there due to problems with social security payments.²⁵

In addition to the financial impact of sanctions, there has also been **concern regarding the sanctioning process**. The guidelines followed by those who administer sanctions in local Social Security Offices allows for sanctions to be imposed when a claimant has failed to meet a condition of the benefit e.g. attendance at a 'back to work' scheme interview, without 'good reason'. The vague and subjective nature of such criteria has led to criticism that decisions to impose sanctions are arbitrary. By way of illustration, it is common for survey respondents in R2W monitoring to relate their experience of being sanctioned for arriving early

²³ PPR received information under Freedom of Information legislation in June 2015 from the Department for Social Development regarding the total number of recorded Employment Support Allowance (ESA) and Jobseekers Allowance (JSA) sanctions broken down by Social Security Office in the last year. According to this information, in the period April 2014 – April 2015, 5779 sanctions were imposed on people in receipt of Jobseekers Allowance in Northern Ireland. the same information indicates that in the same period 13, 609 'adverse decisions' were made to remove people's entitlement to ESA.

²⁴ United Nations Committee on Economic, Social and Cultural Rights General Comment 19, paragraph 59(a):

"Under no circumstances should an individual be deprived of a benefit on discriminatory grounds or of the minimum essential level of benefits"

²⁵ (2014) Trussell Trust, Below the Breadline: The Relentless Rise of Food Poverty in Britain, accessed at: http://www.trusselltrust.org/resources/documents/foodbank/6323_Below_the_Breadline_web.pdf

or late to appointments or missing appointments because of a funeral etc. The arbitrary nature of sanction decisions is also suggested in the high rate of sanction decisions which are overturned on appeal, indicating that many are deprived of their social security entitlement without just cause.²⁶

Furthermore, research suggests that the **use of sanctions is not effective** at encouraging claimants to adhere to scheme conditions in order to secure a job. A 2015 cross area analysis of the UK carried out by Oxford University identified that whilst the use of sanctions has led to a drop in the numbers of people accessing social security payment, it has not resulted in more people returning to employment.²⁷

Effective remedy

R2W monitoring of the progressive realisation of the right to social security has also identified difficulties in accessing effective remedies when social security is denied. Noting the absence of sufficient information and support about how to appeal a decision to change or sanction benefit entitlement, many people reported their experience of the process as 'very stressful'. In March 2013, R2W monitoring identified that of those surveyed who had been sanctioned, 64% stated that they did not have sufficient information to appeal the decision. This number rose to 77% in March 2014. PPR are therefore concerned that social security claimants' right to an effective remedy is not being appropriately upheld.

Suggested Questions:

- **The Committee may wish to ask the UK Government how the Northern Ireland Executive is ensuring that the application of social security sanctions are not interfering with people's right to a minimum essential level of benefits.**
- **The Committee may also wish to ask what measures will be put in place to ensure vulnerable groups are protected in any future changes to social security which may take place in Northern Ireland.**

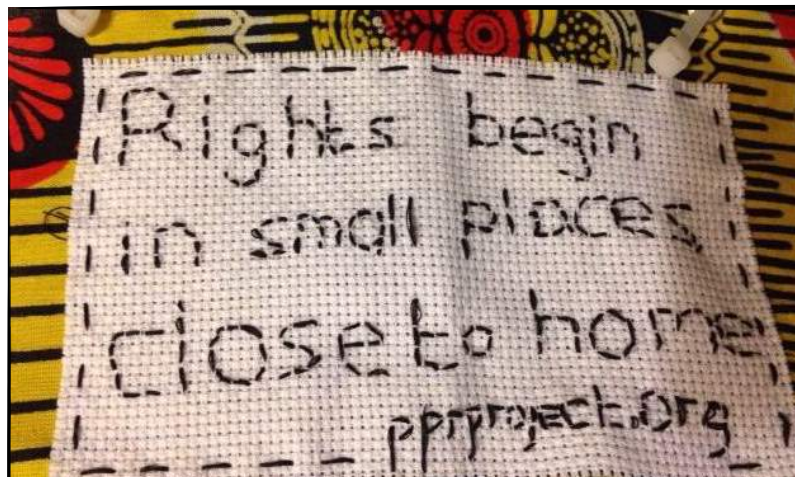
²⁶The average rate of appeals success for those sanctioned over the period 22 Oct 2012 to 30 Sept 2013 was 58 percent. In the three months to 30 Sept 2013, the success rate was 87 percent. (2014) 'The DWP's JSA/ESA Sanctions Statistics, Webster, 19 February 2014, accessible at: <http://www.welfareconditionality.ac.uk/2014/03/the-great-sanctios-debate/>

²⁷ (2015) 'Do punitive approaches to unemployment benefit recipients increase welfare exit and employment? A cross-area analysis of UK sanctioning reforms' Working Paper produced by Rachel Loopstra, Aaron Reeves, Martin McKee and David Stuckler, University of Oxford.

**The Right to the
Widest Possible
Protection and
Assistance for the
Family**

(Article 10 (1))

**KEY ISSUES:
DOMESTIC VIOLENCE
AND NON-
MOLESTATION ORDERS**



In 2009, the Committee recommended that the State party reinforce its measures to combat violence against women²⁸. Since 2011, PPR has been working with **Footprints Women's Movement on Non-Molestation Orders**, a civil order aimed at preventing abusive partners (or ex-partners) from using, or threatening violence, intimidation, or harassment and to ensure the safety of anyone experiencing domestic violence and their family. They can be issued by a court ex parte, and are not legally in force until served on the partner by the Police Service of Northern Ireland (PSNI).

The Northern Ireland Executive's Domestic Violence strategy 'Stopping Domestic Abuse and Sexual Violence in Northern Ireland 2013-2020'²⁹ states the intention at page 68, paragraph 4.113 to 'secure the provision of efficient and effective civil proceedings' for those affected by domestic violence. In its General Recommendation No.19 (eleventh session, 1992) of the Committee on the Elimination of Discrimination against Women, the Committee recommended:

"States parties should take appropriate and effective measures to overcome all forms of gender-based violence, whether by public or private act"³⁰

During Footprints Women's Movement's work with women impacted by domestic violence, they submitted several Freedom of Information requests on this issue, it became clear **that there is no overall policy requiring monitoring of the time taken to serve a non-Molestation Order, or any target or guideline time** within which the PSNI deems it appropriate for a non-Molestation Order to be served.

Suggested Recommendation:

- **The Committee may wish to recommend that measures put in place to address domestic violence such as non-molestation orders, are rigorously monitored, with targets set against them to ensure they are appropriate and effective**

²⁸ Concluding Observations of the Committee on Economic, Social and Cultural Rights, United Kingdom of Great Britain and Northern Ireland, the Crown Dependencies and the Overseas Dependent Territories (June 2009) UN Doc E/C.12/GBR/CO/5 Para. 24

²⁹ Accessed at: <http://www.dhsspsni.gov.uk/dsva-strategy.pdf> as consultation document. The final strategy is not yet on the DHSSPSNI website.

³⁰ CEDAW General Recommendation No. 12 (11th Session, 1992) accessed at: <http://www.un.org/womenwatch/daw/cedaw/recommendations/recomm.htm#recom19>

The Right to Adequate Housing (Article 11)

KEY ISSUES:

PERSISTING RELIGIOUS INEQUALITY EXPERIENCED BY CATHOLICS IN NORTH BELFAST AND RELATED CONCERNS REGARDING DISAGGREGATED DATA & THE USE OF PUBLIC LAND TO ADDRESS HOUSING RIGHTS.



Amongst the 2009 CESCR Concluding Observations relating to the right to adequate housing the Committee noted concern regarding “the chronic shortage of housing, in particular social housing, for the most disadvantaged and marginalized individuals and groups, such as ...Catholic families in Northern Belfast, in spite of the financial resources provided, and other measures taken, by the State party in this regard”.³¹

Whilst gaps/omissions in the State Party’s Periodic Report are addressed at the beginning of this report, PPR wish to draw specific attention to those omissions relevant to the right to adequate housing in Northern Ireland.

The comments included in the State Party’s Periodic Report (paragraphs 51–54) only partially assess the Committee’s concerns. The Periodic Report refers to both the “Facing the Future: Housing Strategy for Northern Ireland 2012–2017” and the “Social Housing Reform Programme”(paragraph 54). However, no information is presented in relation to the impact of either policy on the progressive realisation of rights for vulnerable groups.

Significantly, the State Party’s report omits any reference to the CESCR concern regarding the chronic shortage of housing for Catholic families in North Belfast.

This absence is especially notable given the attention drawn to the issue by the **UN Special Rapporteur on Adequate Housing**³² and the inclusion in the ten

³¹ Concluding Observations of the Committee on Economic, Social and Cultural Rights, United Kingdom of Great Britain and Northern Ireland, the Crown Dependencies and the Overseas Dependent Territories (June 2009) UN Doc E/C.12/GBR/CO/5 Para. 29

³² Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context, Raquel Rolnik. Addendum Mission to the United Kingdom of Great Britain and Northern Ireland (Dec 2013) UN Doc A/HRC/25/54/Add.2 Para. 73

recommendations issued following her Official Visit to the UK in September 2013, which called for “additional efforts to address challenges to overcome persistent inequalities in housing in North Belfast.”³³

Since 2007 PPR has been working with the homeless and families living in inadequate housing in north Belfast to monitor the progressive realisation of housing rights in their community. The residents, who previously attended the Committee’s 2009 examination, are now known as the **‘Equality Can’t Wait’ (ECW) campaign**. This work has now expanded with people in housing crisis across Belfast and beyond becoming involved.

The ECW residents group’s monitoring through surveys and focus groups demonstrates considerable unmet housing need, particularly **in the Catholic community of north Belfast where religious inequality impacting this group has been identified**. Preliminary survey results from ECW’s 2015 monitoring for example, identify indicate that a majority (57%) of respondents’ homes do not meet their family’s needs.

In addition to the persisting religious inequality in social housing impacting the Catholic community in north Belfast, the Committee may wish to be aware of two further related developments since the last examination in 2009.

Developments since 2009: disaggregated data



The Committee may be aware that following her official visit to Northern Ireland in September 2013, the UN Special Rapporteur on Adequate Housing expressed **‘concerns about differences in the way information is collected, disaggregated and presented’**³⁴

Disaggregated data regarding the experiences of vulnerable groups is of particular importance in Northern Ireland **in light of the provisions contained within the Good Friday/ Belfast Agreement**. In acknowledgment of the socio-economic inequalities which underscored the conflict in Northern Ireland, the peace agreement made specific provision to ensure that public authorities had ‘due regard’ to the promotion of equality of opportunity amongst nine groups, in all of their functions. This provision, made a legal requirement in **Section 75(1) of**

the Northern Ireland Act 1998, includes a requirement that public authorities develop and maintain accurate data monitoring systems to ensure that inequalities are identified and tackled.

Monitoring systems to capture the extent of recognised inequalities have previously been put in place in Northern Ireland in relation to employment inequalities. These systems have resulted in considerable success noted in religious differentials

³³ Ibid., Para 80 (i)

³⁴ PPR has developed an evidence base regarding multiple concerns relating to disaggregated data although this submission concentrates primarily on the monitoring method used to record the religious background of social housing applicants.

between Catholics and Protestants in the workplace.³⁵ For example, as noted by the Committee on the Administration of Justice in their 2006 report, by 2004 the imbalances in the workplace had been significantly reduced with the overall workforce composition (58% Protestant 42% Catholic) more reflective of the proportion of those available for work (57% Protestant 43% Catholic).³⁶

Guidance developed by the Equality Commission for Northern Ireland relating to fair employment in the workplace, for example states that in cases where an applicant does not self identify their religious background, a residuary method can be used to identify their religious background based on other information they have supplied.^[2] Section 11(3) of the Fair Employment (Monitoring) Regulations (Northern Ireland) 1999 lists information which can be used for this purpose including for example, the school the person attended or where they live^[3]. Additionally, the admissions criteria for some integrated education schools also include reference to the use of similar proxies to identify the religious background of applicants who do not self identify. **In these sectors ensuring that public authorities develop the fullest picture about the extent of inequalities has led to appropriate targeting and improved outcomes for disadvantaged groups.**

PPR is concerned however, that a similar approach has not occurred in relation to monitoring the religious background of social housing applicants despite the recognised religious inequality in this area. This concern is intensified in light of the successful approach taken elsewhere in Northern Ireland to monitor and address inequality.

The Northern Ireland Housing Executive (NIHE) does not use a residuary methodology to identify the religious background of applicants who do not self identify. In practice this means that the religious background **of a significant number of applicants is ‘unknown’ or ‘undisclosed’**. Consequently, the **extent of inequalities facing such groups is masked.**

Information received under Freedom of Information legislation in August 2015 indicates that 11% of all social housing applicants termed to be in ‘housing stress’ in the north Belfast have a religious background which is unknown or undisclosed. As the table below shows, the % of applicants whose religious background is unknown is similar to those with a religious background as ‘Protestant’ (16%) and significantly higher than those whose background is recorded as ‘mixed’ (1%) ‘none’ (4%) or ‘other’ (5%).

³⁵ See for example (2006) Equality in Northern Ireland: the Rhetoric and Reality, Committee on the Administration of Justice, Chapter 2 which acknowledges “substantial progress towards a more equitable distribution of employment and employment opportunities”.

³⁶ Ibid., p.18

^[2] (2011) Equality Commission for Northern Ireland, A Step By Step Guide to Monitoring; Monitoring Your Workforce and Applicants in Line with Fair Employment Regulations, accessed at: <http://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Monitoring%20and%20review/StepbyStepguide2011updated26-2-14.pdf>

^[3] A list of possible residuary methods is contained within Section 11(3) of the Fair Employment (Monitoring) Regulations (Northern Ireland) 1999 accessed at: <http://www.legislation.gov.uk/nisr/1999/148/regulation/11/made>

Social Housing Applicants in Housing Stress in the NIHE north Belfast area (2015) ^[4]						
Catholic	Protestant	Other	Undisclosed	Mixed	None	Refused
901	226	79	163	11	62	5
62%	16%	5%	11%	1%	4%	0%

Suggested Recommendation:

- The Committee may wish to recommend inequalities facing disadvantaged groups such as Catholics in North Belfast are appropriately identified, including the use of residuary methods in line with best practice.

Developments since 2009: land use

A key obstacle to realising housing rights for the Catholic community in north Belfast is the **failure by relevant bodies with responsibility for housing, to use available public land** to build the required social housing to tackle religious inequality impacting this community. The use of public land to realise housing rights is a developing human rights issue of global concern. PPR are cognisant of the valuable work of the previous Special Rapporteur on the Right to Adequate Housing in her 2012 report to the United Nations General Assembly. In this report, Ms Rolnik noted that despite the importance of this land, “there remain obstacles to using public land for such purposes. For instance, poor land governance, corruption in land administration and the tight relationship that exists between tenure status and land values encourages nepotism, corruption, clientelism and market-driven interests in public land allocation.”³⁷

Available public land to address housing rights for disadvantaged groups particularly in north Belfast is at a premium though it does exist. In 2015 ECW residents engaged in a ‘photo-mapping’ exercise to identify vacant land which could be used to build social housing. Both public land and land which public authorities have powers to vest or acquire were identified. Since 2006, PPR along with other civil society organisations in Northern Ireland including the Committee on the Administration of Justice (CAJ) have expressed concern regarding the missed opportunities to use public land in this way at sites in north Belfast such as the Girdwood Barracks. The approach by the Northern Ireland Executive to the use of available land for this purpose has not improved since then. Last year, media reports highlighted that the Northern Ireland Executive was considering the sale of land at the Belfast Harbour to finance a reduction in the levels of ‘Corporation Tax’ for corporations choosing to locate in Northern Ireland.³⁸ This site could potentially support 3,500 homes of which 10–15% would be zoned for social housing by planners.

³⁷ (2012) Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context, Raquel Rolnik A/HRC/22/46 paragraph 78

³⁸ 17th December 2014, Belfast Harbour Estate: Stormont planning £400m sell-off to pay for corporation tax

Belfast Telegraph newspaper. Accessed at: <http://www.belfasttelegraph.co.uk/news/northern-ireland/belfast-harbour-estate-stormont-planning-400m-selloff-to-pay-for-corporation-tax-30843486.html>

Suggested Question:

- The Committee may wish to ask the UK Government and the Northern Ireland Executive what measures it has in place to ensure that public land use respects, protects and fulfils the right to adequate housing, for disadvantaged groups.

Suggested Recommendation:

- The Committee may wish to recommend that the Northern Ireland Executive use its available powers to take steps to ensure that land capable of realising the right to adequate housing, particularly for disadvantaged groups such as Catholics in north Belfast, is used for such purposes.

The Right to the Highest Attainable Standard of Health

(Article 12)

**KEY ISSUES:
EQUAL ACCESS TO SERVICES FOR MENTAL HEALTH PATIENTS & FUNDING FOR MENTAL HEALTH SERVICES**



In 2009 the Committee noted the “increasing rates of suicide in Northern Ireland and Scotland”³⁹ and the “difficulties in accessing the complaints system” and called on states to address this by targeting causes of suicide, ensuring access to the complaints system and strengthening the provision of psychological counselling services. The Committee also recommended that immediate steps be taken to address “regressive measures taken in funding mental health services”.⁴⁰ Despite this, the UK’s report’s only reference to mental health and suicide rates in Northern Ireland is a brief reference to Protect Life, the suicide strategy put in place by the Northern Ireland Executive.

In 2014, research produced by The Samaritans collated suicide statistics produced by the relevant government authorities in each region of the United Kingdom for comparison⁴¹. An analysis of government authority information carried out by The

³⁹ Concluding Observations of the Committee on Economic, Social and Cultural Rights, United Kingdom of Great Britain and Northern Ireland, the Crown Dependencies and the Overseas Dependent Territories (June 2009) UN Doc E/C.12/GBR/CO/5 paragraph 35

⁴⁰ Ibid., paragraph 33

⁴¹ (2014) The Samaritans, Suicide Statistics Report 2014, accessible at: <http://www.samaritans.org/sites/default/files/kcfinder/files/research/Samaritans%20Suicide%20Statistics%20Report%202014.pdf>

Samaritans showed that **Northern Ireland has the highest suicide rate in all regions of the UK – 15.2 per 100,000 of the population**, compared with an overall UK suicide rate of 11.6 per 100,000 of the population. The **rate of male suicides is also higher in Northern Ireland** with 24.0 suicides per 100,000 of the population in 2012 compared to a UK average of 18.2.

The number of registered deaths by suicide in Northern Ireland has not reduced since the last examination by the Committee. In 2009 there were 260 registered deaths by suicide, the most recent government figures (2014) indicate that there were 268 registered deaths by suicide. Government figures also highlight that the parliamentary constituencies of North and West Belfast consistently occupy the highest ratings for registered deaths by suicide. These statistics also confirm that suicide in Northern Ireland **disproportionately affects men** with three quarters (207) of those whose deaths were registered as suicide in 2014 being male.⁴²

PPR works with the **Mental Health Rights Campaign (MHRC) Groups**; a collective of mental health patients, carers and families bereaved by suicide who are using PPR's human rights based approach to improve mental health services.

Mental Health Care at Hospital Emergency Departments

A key issue the group work on is treatment received when those in mental health crisis attend a hospital Emergency Department for care.

In 2010 a Northern Ireland wide appointment system for those attending Accident & Emergency departments in mental health crisis was put in place. The **'Card Before You Leave'** is which was designed by the Mental Health Rights Campaign group based on their own experiences and best practice standards, and commits to providing those discharged from Emergency Departments with an appointment card with the date and time of their follow up appointment. The group called the programme a 'lifeline' which would ensure the patient knew they were still tied into services as a time which is statistically a high suicide risk period.

A survey they carried out in 2015 with 102 mental health service users and carers showed that only 40% of those who attended an Emergency Department in mental health crisis and were discharged in need of follow up received a Card before You Leave. ⁴³

A further issue uncovered at Emergency Departments is the issue of **delay in carrying out 'Sectioning'** i.e. being detained for mental health assessment under the Mental Health (NI) Order 1986.

This issue was first highlighted in a Serious Adverse Incident Review carried out by Belfast Trust following the death of Jonathan Magee in January 2011. Mr. Magee was taken to a Belfast hospital by ambulance after an incident of self-harming. Despite



⁴² For further, please see NI government statistics on suicide such as the NINIS dataset 'Deaths by Cause' available at <http://www.ninis2.nisra.gov.uk/>

⁴³ Concerns regarding the implementation of the Card Before You Leave system have also been raised by the Northern Ireland Human Rights System in their 2015 report which followed a Northern Ireland wide inquiry into Emergency Care.

the doctor initiating the sectioning process, there was a delay before the GP arrived to complete the process. Mr. Magee absconded from hospital before the GP arrived and took his own life the next day. As a result of the Serious Adverse Incident Review the Belfast Trust agreed a process to improve the timescale for GP attendance in cases of for detention in an emergency situation. Despite this an official from the Belfast Trust confirmed in July 2015 that there were still ongoing delays in sectioning due to delays with out of hours GPs.

Visits to Emergency Departments in 3 of the 5 other Health Trust areas of Northern Ireland by members of the Mental Health Rights Campaign revealed similar issues there, **indicating that this problem is not isolated to one area**. The MHRC Groups have discovered that the Mental Health (NI) Order allows for the GP's role to be carried out by other qualified staff in the hospital, but this rarely happens in practice. In cases of urgent necessity only, a doctor on the staff of the A&E Emergency Department can make the medical recommendation but only if it has not been possible to contact the person's own GP or another doctor in the practice or it is not practicable for either doctor to attend.

Regressive measures taken in funding mental health services

In 2009 the Committee highlighted a concern with regressive measures taken with regards the funding of mental health services. PPR are concerned that in the period since the last examination the **situation has worsened and that huge funding pressures are in fact at the root of the problems** outlined above.

Despite the higher prevalence of mental health needs in Northern Ireland, funding for mental health services is lower here than elsewhere in the UK. The Department for Health Social Services and Public Safety commissioned Appleby Report⁴⁴ identified that **despite mental health needs in Northern Ireland estimated to require nearly 44% higher per capita funding than in England, actual spending is between 10%– 30% lower** than per capita spending on mental health in England.

In addition to this, PPR are concerned by **significant reductions in inpatient mental health beds in Northern Ireland**. In the same year as the Committee's last examination, the largest Health Trust in Northern Ireland, the Belfast Trust announced a reduction in inpatient beds for acute mental health patients from 114 to 92.⁴⁵ No comprehensive data is available regarding the reductions in inpatient mental health beds though reports from the health sector trade union, UNISON indicate that reductions in bed numbers across the health service in Northern Ireland number up to 1000.

⁴⁴ Appleby, J. For DHSSPSNI "Rapid review of Northern Ireland Health and Social Care funding needs and the productivity challenge: 2011/12–2014/15" accessible at: http://www.dhsspsni.gov.uk/final_appleby_report_25_march_2011.pdf

⁴⁵ (2009) Belfast Health and Social Care Trust, Excellence and Choice in the Future of Acute Mental Health Service Delivery accessible at: http://www.belfasttrust.hscni.net/pdf/Excellence_and_Choice_Adult_Mental_Health_Services.pdf

Suggested Recommendations:

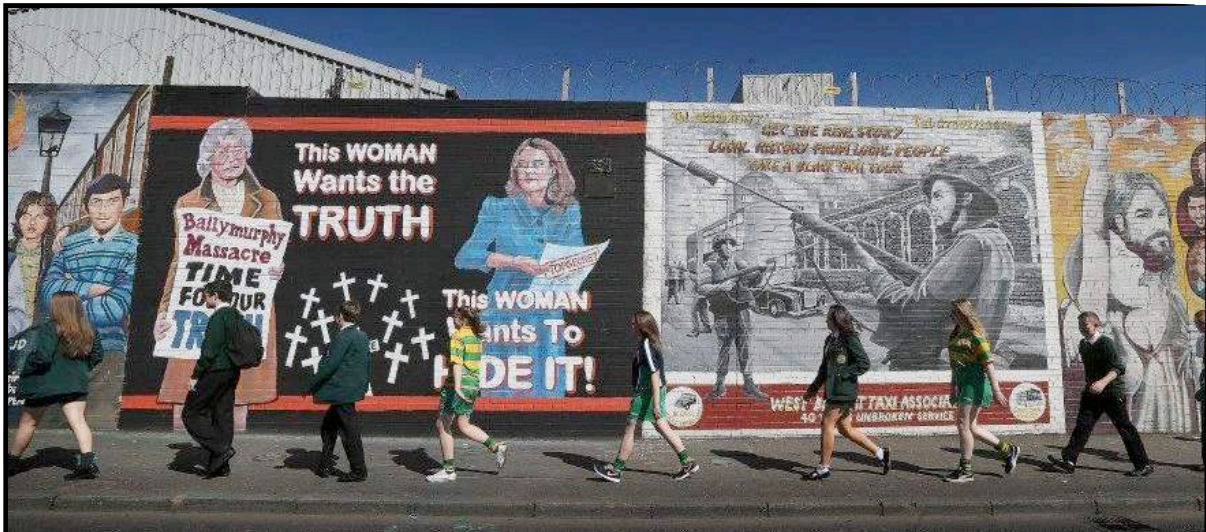
- The Committee may wish to recommend that steps are taken to ensure that adequate follow up arrangements are put in place for mental health patients who seek treatment at Emergency Departments. Such steps should include effective 'sectioning' protocols implemented in timely manner which includes the training of medical professionals.
- The Committee may wish to recommend that the Northern Ireland Executive take steps to adequately resource mental health care in Northern Ireland in accordance with the level of need, paying particular attention to the mental health needs of vulnerable groups.

The Right to Education

(Article 13)

KEY ISSUES:

THE PROVISION OF SPECIAL EDUCATIONAL NEEDS PROVISION IN IRISH MEDIUM SCHOOLS



PPR are aware of the submission to the Committee made by Conradh na Gaeilge and supportive of the position put forward to the Committee in this submission. As outlined in Conradh na Gaeilge's submission, in 2014 PPR were approached by a campaigning group of parents (**Tuistí an Tuaiscirt** - 'parents of the north') from north Belfast whose 122 children attend Coláiste Feirste, the only Irish medium post-primary school in Northern Ireland. PPR worked with Tuistí to successfully campaign for transport to school which was practically recognised and appropriately resourced in line with the NI Executive's duty to encourage and facilitate Irish Medium education⁴⁶.

From this work with parents, PPR has become aware of issues relating to the provision of Special Educational Needs provision for children and young people attending Irish Medium schools.

⁴⁶ Under the terms of the 1998 Good Friday Agreement, the UK government and NI Executive have an obligation to "take resolute action to promote the Irish language". An Irish Language Act was promised which would reverse the under investment and neglect of the language. The Education (Northern Ireland) Order (1998) further committed the Minister and Department of Education to "encourage and facilitate" the development of Irish medium education.

Special Educational Needs provision in Irish Medium Education

PPR is deeply concerned by information shared in Conradh na Gaeilge's submission to the Committee which identifies that there are approximately 38 dedicated units for special educational needs at primary level (children aged 5–11 years old), **none of which cater for pupils who speak Irish.**

PPR recognise the importance of early diagnosis of special educational needs in ensuring children can access appropriate support. Additionally, **PPR are concerned by the discriminatory impact of this disparity in provision for children in Irish language schools.** Notwithstanding the Good Friday/Belfast Agreement duty which exists on the Northern Ireland Executive to promote the Irish language, PPR are also cognisant of the duty imposed on the State Party under the terms of Article 2(2) of the International Covenant on Economic, Social and Cultural Rights, not to discriminate.

The Committee may be interested to learn that in contrast to this position the Code of Practice for Special Educational Needs for Wales states;

“All other bodies which help pupils and their parents, but which are not covered by the Welsh Language Act, should also, in so far as they are able, ensure that their services are delivered in Welsh and/or English as appropriate. It should be remembered that Welsh or English speaking children and young people's progress will be hindered if they do not receive services in the language in which they are most comfortable, and this applies equally to those pupils receiving Welsh medium, English medium or bilingual education.”⁴⁷

PPR further echo concerns of Conradh na Gaeilge in that this discriminatory practice is perpetuated by the failure of the Northern Ireland Executive to produce an Irish Language Act despite the Committee's 2009 recommendation and a range of additional international interventions.⁴⁸

Suggested Recommendation

- **As a matter of urgency, the State Party should provide culturally appropriate diagnostic and support provisions for children and young people with Special Education Needs within the Irish Medium Education sector.**

⁴⁷ (2004) Special Educational Needs Code of Practice for Wales, p.3 accessed at: <http://learning.gov.wales/docs/learningwales/publications/131016-sen-code-of-practice-for-wales-en.pdf>

⁴⁸ These interventions have included the Committee of Experts on the implementation of the European Charter for Regional and Minority Languages (COMEX)



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