

# Response to UK report on ICESCR

(International Covenant on Economic, Social and Cultural Rights)

This submission is made on behalf of Soroptimist International Great Britain and Ireland (SIGBI) - <http://sigbi.org/>. We are committed to a world where women and girls together achieve their individual and collective potential, realise aspirations and have an equal voice in creating strong, peaceful communities worldwide. We have Special Consultative Status with ECOSOC at the UN. We are one of four federations of Soroptimist International (SI - <http://www.soroptimistinternational.org/>), which has General Consultative Status with the UN.

Soroptimist Mission - Soroptimists inspire action and create opportunities to transform the lives of women and girls through a global network of members and international partnerships.

Soroptimist Values:

- Human Rights for all;
- Global peace and international goodwill;
- Advancing women's potential;
- Integrity and democratic decision making;
- Volunteering, diversity and friendship.

Soroptimist Goals:

1. Soroptimist International will improve the lives and status of women and girls through education, empowerment or enabling opportunities.
2. Soroptimist International will be a global voice for increasing access to education and leadership for women and girls.

Our comments apply to those areas where we feel we have interest and experience but we have used available research evidence rather than anecdote. The UK Programme Action Committee of SIGBI (<http://sigbi.org/ukpac/our-work/>) is involved with work across the areas commented upon. We trust this is a positive contribution to the examination of the report of the UK Government.

## 1. Overview – including para 1

1.1. We note that the UK has not signed and ratified the Optional Protocol to the International Covenant on Economic, Social and Cultural Rights: 2013 (ICESCR) even though it has signed and ratified the original covenant of 1976<sup>1</sup>. This failure prevents the UN receiving communications from or on behalf of UK citizens on issues covered by the ICESCR. This is, to say the least, unfortunate and we would welcome a reversal of the position of the UK Government on this matter. The Equality and Human Rights Commission (EHCR) also comments on this omission and seeks redress<sup>2</sup>. The EHCR report goes into much detail on both the improvements and lack of progress since its original submission in August 2015 and the report of April 2016. We would endorse their comments and suggestions, in particular comments on a Bill of Rights and the effect it could have on the rights enjoyed across the UK. The Human Rights Act is embodied in devolution settlements for Northern Ireland, Scotland and Wales and could not be changed without their agreement. Discussion would be welcome in order to move,

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<sup>1</sup> <http://indicators.ohchr.org/> - accessed 31 May 2016.

<sup>2</sup> <https://www.equalityhumanrights.com/en/socio-economic-rights-uk> - accessed 31 May 2016.

hopefully, towards full enactment in UK law for the provisions and the full benefits of the ICESCR.

1.2. The picture across many paragraphs varies between England, Scotland, Wales and Northern Ireland. This paper only refers to these where they appear to have direct relevance.

## **2. Welfare reform – covering paras 4, 9, 10, 14, 15, 21, 22, 23, 24**

2.1. Although the principle of Universal Credit (UC) is welcome the implementation of the new system has caused and is continuing to cause much hardship to those least able to support themselves. The Resolution Foundation is critical of its current effects<sup>3</sup>, including 3 million working families no longer entitled to in-work support losing, on average, £42 per week and those receiving UC losing £41 per week. Countering this effect they believe that 1.7 million in receipt of UC will gain £38 per week (not the same people as above). Stephen Crabbe MP, the new Secretary of State for the Department of Work and Pensions (DWP), has committed himself to continued roll-out of UC. It is to be hoped that he will take note of, and implement, the recommendations of the Resolution Foundation, which might help to correct the imbalances apparent currently.

2.2. The levels of destitution appear to have increased<sup>4</sup>. This covers people who cannot afford to buy the essentials to eat, stay warm and dry, and keep clean. This is closely linked with levels of poverty.

2.3. The Joseph Rowntree Foundation (JRF) quotes<sup>5</sup> the ONS figures showing that just under a third of people in the UK experienced poverty between 2011-2014 with just over a third of them being in persistent poverty for 2-3 years at a time. Although the UK's rate of exit from poverty is high the rate for falling back into poverty is also high. Rising employment rates have helped people obtain work but we have a high proportion of low skilled and low paid jobs together with zero-hours contracts and other time limited jobs.

2.4. JRF estimates that about 2.3 million children are living below the level used in the Child Poverty Act 2010 for relative poverty – a fifth of all children<sup>6</sup>.

2.5. A report from Sheffield Hallam University explores the impact of welfare reform since 2010<sup>7</sup>. Its key points are:

2.5.1. The post-2015 welfare reforms will take almost £13bn a year from claimants by 2020-21.

2.5.2. This brings the cumulative loss since 2010 to £27bn a year – equivalent to £690 per year for every adult of working age.

2.5.3. The new reforms impact unevenly across the country. Older industrial areas, less prosperous seaside towns, some London boroughs and a number of other towns are hit hardest. By contrast, much of southern England and London escape lightly.

2.5.4. At the extremes, Blackburn and Blackpool in Lancashire each lose £560 per working age adult (on average) as a result of the post-2015 reforms, compared to £150 in Guildford in Surrey, £140 in Richmond upon Thames, and just £130 in the Hart district in Hampshire.

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<sup>3</sup> [www.resolutionfoundation.org/publications/universal-challenge-making-a-success-of-universal-credit/](http://www.resolutionfoundation.org/publications/universal-challenge-making-a-success-of-universal-credit/) - accessed 1 June 2016.

<sup>4</sup> <https://www.jrf.org.uk/report/destitution-uk> - accessed 1 June 2016.

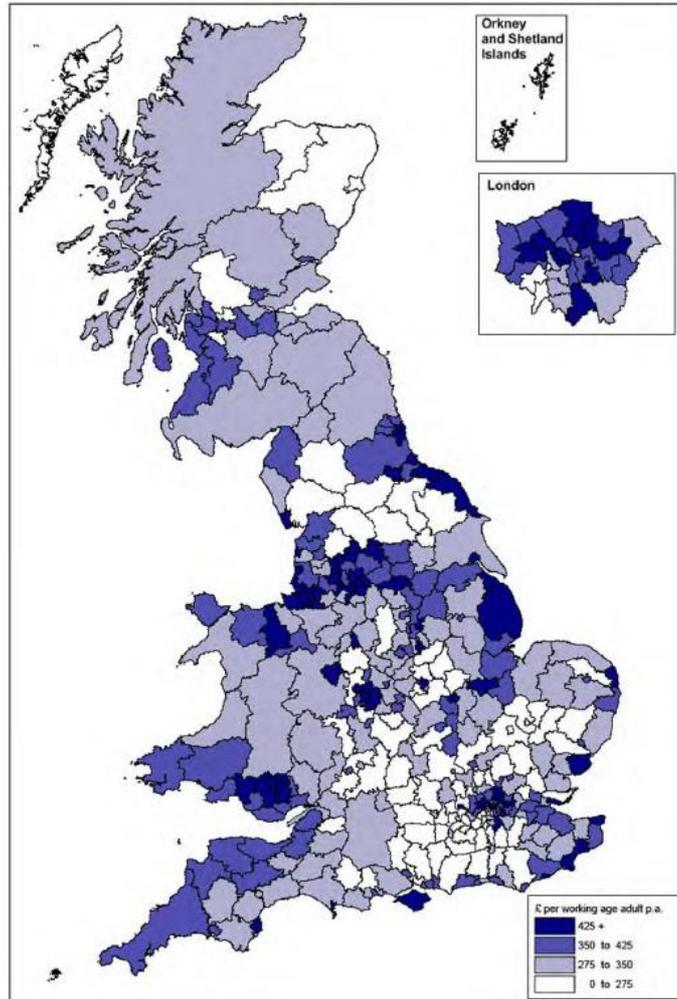
<sup>5</sup> <https://www.jrf.org.uk/blog/persistent-poverty-uk-needs-get-better-preventing-people-falling-back-poverty> - accessed 1 June 2016.

<sup>6</sup> <https://www.jrf.org.uk/report/creating-anti-poverty-childcare-system> - access 1 June 2016

<sup>7</sup> The Uneven impact of welfare reform; ISBN: 978-1-84387-392-1

- 2.5.5. 15 of the 20 hardest-hit places have more than the GB average share of households with three or more dependent children. 12 of the 20 have a population of Asian ethnic origin exceeding 10 per cent.
- 2.5.6. As a general rule, the more deprived the local authority the greater the financial loss.
- 2.5.7. 83 per cent of the loss from the post-2015 reforms – £10.7bn a year by 2020/21 – can be expected to fall on families with dependent children. On average, couples with two or more dependent children lose £1,450 a year while lone parents with two or more lose £1,750 a year.
- 2.5.8. The post-2015 reforms hit working-age tenants in the social rented sector particularly hard – on average they can expect to lose almost £1,700 a year, compared to £290 a year for working-age owner occupiers.
- 2.5.9. Overall, £6.2bn a year of the financial loss arising from the post-2015 welfare reforms – just under half – is estimated to fall on working-age social sector households.
- 2.5.10. Parallel changes in tax, the minimum wage, social sector rents and childcare entitlement go some way to compensate but the winners and the losers are only sometimes the same people and it is unlikely that the full financial loss will be offset.
- 2.5.11. A key effect of welfare reform appears to be to widen the gap in prosperity between the best and worst local economies across the country. This is mirrored in recent historical international comparisons – see figure 1 & 2 below. In our view, this is unacceptable for the fifth largest economy in the world.

Figure 1: Estimated loss arising from welfare reform by March 2016, by district



Source: Sheffield Hallam estimates based on official data

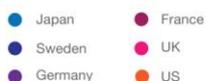
Figure 1 - Estimated loss arising from welfare reform by March 2016 by district

## The Price of Inequality

In 2009, Richard Wilkinson and Kate Pickett made headlines with *The Spirit Level*, a ground-breaking book that argued that rising levels of inequality were leading directly to unhappier, unhealthier societies.

Three years on, we have decided to look at the latest data and see if their central thesis still holds.

Does greater equality benefit everyone?



Sources:  
 1. World Bank - GINI, most recent data used for each country  
 2. Miles Corak (2012), "Inequality from Generation to Generation: The United States in Comparison," in Robert Rycroft (editor), *The Economics of Inequality, Poverty, and Discrimination in the 21st Century*, ABC-CLIO, forthcoming.  
 3. Gapminder.org, various sources, 2011 figures  
 4. World Bank (2007-11)  
 5. WHO 2010  
 6. United Nations 2011 data  
 7. UNODC (most recent varies by country - either 2009 or 2010)  
 8. ICPS: <http://www.icdr.org.uk/wp-content/uploads/2010/09/WPPL-9-22.pdf>  
 9. OECD Society at a Glance 2011  
 10. OECD Society at a Glance 2011  
 11. OECD Society at a Glance 2011  
 12. OECD Society at a Glance 2011  
 13. Treating the scores above as percentages, with the highest score as 100% and the lowest as 0%. Where a high score was best, the calculation was reversed.

Infographic by Adam Frost and Rosie Roche

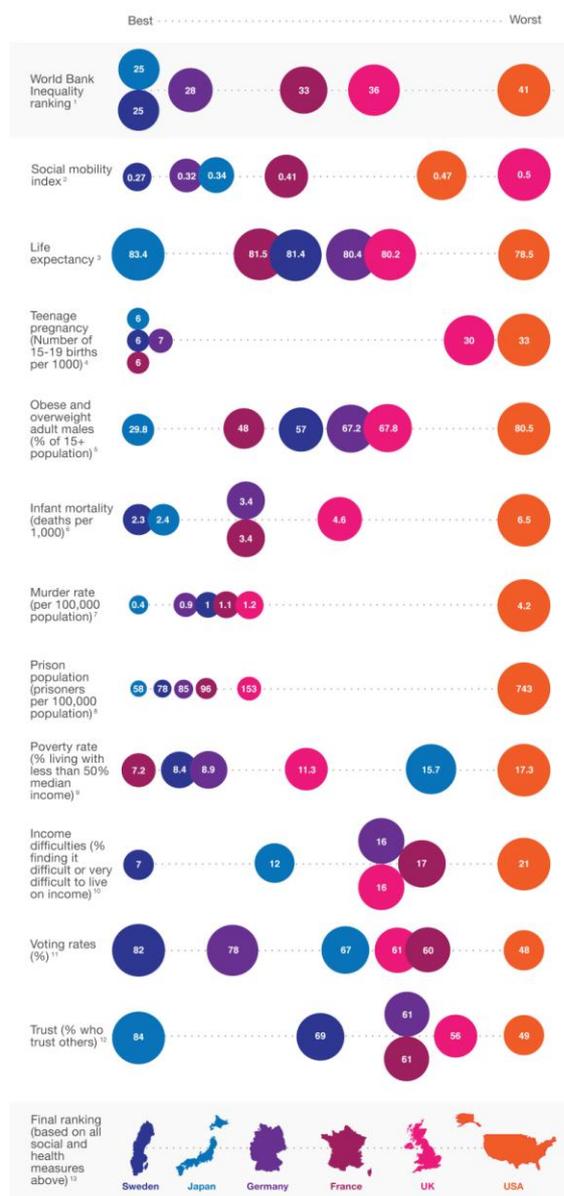


Figure 2 - International inequality

## Figure 2<sup>8</sup> - International inequality

2.6. These data appear to pass on the austerity measures deemed necessary by the UK Government to the poorest sections of society. This is further underlined by the report from JRF on city decline across the UK<sup>9</sup>. It analysed 74 cities and found that, of those experiencing the greatest difficulties, 10 of the top 12 'struggling' cities are based in the north whilst in the south none appeared in the top 24.

2.7. These trends are supported by those from The Trussell Trust which runs food banks. The number of 3-day emergency food supplies issued rose from 913,138 in 2013-2014 to 1,084,604 in 2014-2015 and 1,109,309 in 2015-2016<sup>10</sup>.

<sup>8</sup> <http://www.upworthy.com/6-countries-walk-into-an-infographic-1-cant-walk-out-because-its-too> - accessed 1 June 2016.

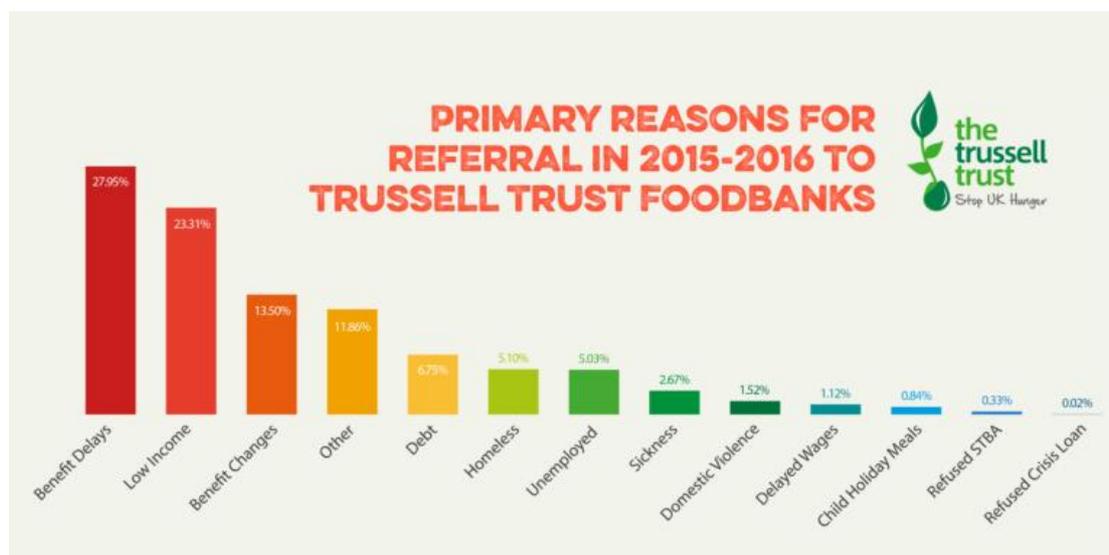
<sup>9</sup> <https://www.jrf.org.uk/report/uneven-growth-tackling-city-decline> - accessed 1 June 2016.

<sup>10</sup> <https://www.trusselltrust.org/2016/04/15/foodbank-use-remains-record-high/> - accessed 1 June 2016.

## NUMBER OF 3 DAY EMERGENCY FOOD SUPPLIES GIVEN BY TRUSSELL TRUST FOODBANKS



2.8. Benefit delays and changes, followed by low income, account for 65% of the reasons for referral.



2.9. The ONS has looked at total wealth within GB and shows that the wealthiest 10% of the population owns 44% of total aggregate household wealth with those living in the South East having the highest median wealth of £309,700 of all households having £218,400<sup>11</sup>.

### 3. Gender Equality & education – paras 7, 8, 29, 30

3.1. Gender inequality remains an issue of concern across the UK despite legislation seeking to address the injustices, beginning with the Equal Pay Act in 1970 and ending with the Equality Act in 2010. This leads to a loss of talent within the workforce and poorer overall performance. It has been estimated that bridging the gender gap could add 26% to GDP for the UK<sup>12</sup>.

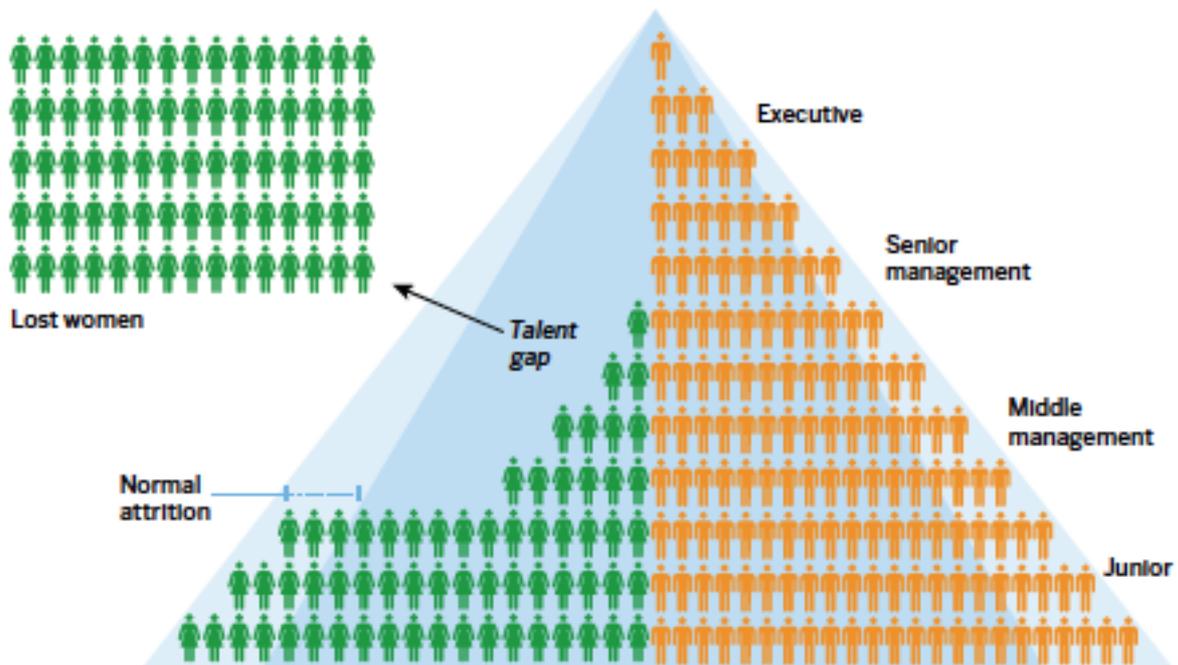
3.2. The Government Equalities Office has sought to cast light on the persisting inequalities in its report “Trailblazing Transparency: Mending the Gap”<sup>12</sup>.

<sup>11</sup>

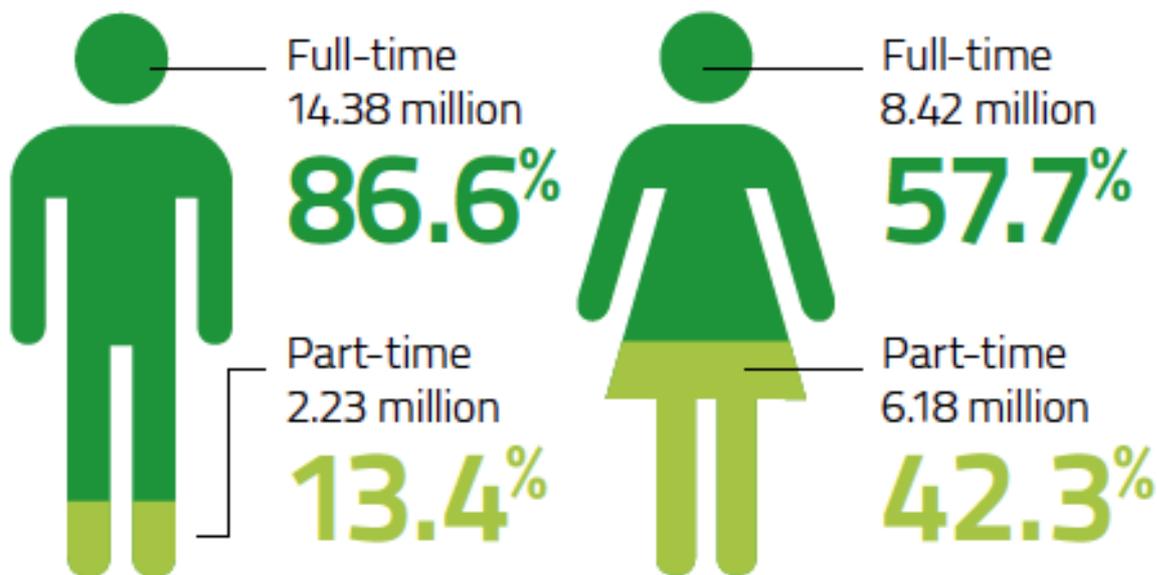
<http://webarchive.nationalarchives.gov.uk/20160105160709/http://www.ons.gov.uk/ons/rel/was/wealth-in-great-britain-wave-3/2010-2012/report--chapter-2--total-wealth.html> - accessed 1 June 2016.

<sup>12</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/498743/Tailblazing\\_Transparency\\_-\\_Mending\\_the\\_Gap\\_report\\_Feb\\_2016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/498743/Tailblazing_Transparency_-_Mending_the_Gap_report_Feb_2016.pdf) - accessed 1 June 2016.



Source: Your loss: How to win Back your Female Talent, 2010



Source: ONS Labour Market Statistics (November 2015).

3.3. Median hourly pay is £13.29 for full-time workers and £8.44 for those in part-time employment. As shown above, this means women earn less, on average, than men.

3.4. Employment rates are roughly equal before the birth of the first child but the rate for women drops to nearly half that of men subsequently and does not recover fully, a rise occurs over the next 10 years but even after 30 years equal levels are not attained.

3.5. Science, Technology, Engineering and Maths areas (STEM) of both qualification and work experience are much lower for women than men – Figure 3.

3.6. The report gives examples of companies seeking to narrow the gap and lists those who have signed up to the Think, Act, Report initiative. Government initiatives in shared parental leave, extending the right to request flexible working and offering families access free, but limited hours, child-care for 3 and 4 year olds are welcome but will it be enough to help bridge the gender gap in employment and earnings? There is variation in this provision across the UK. Only time will tell with the benefits, if any, and comparisons across England, Scotland and Wales might help to understand the effects of differing provision. This should be part of any evaluation.

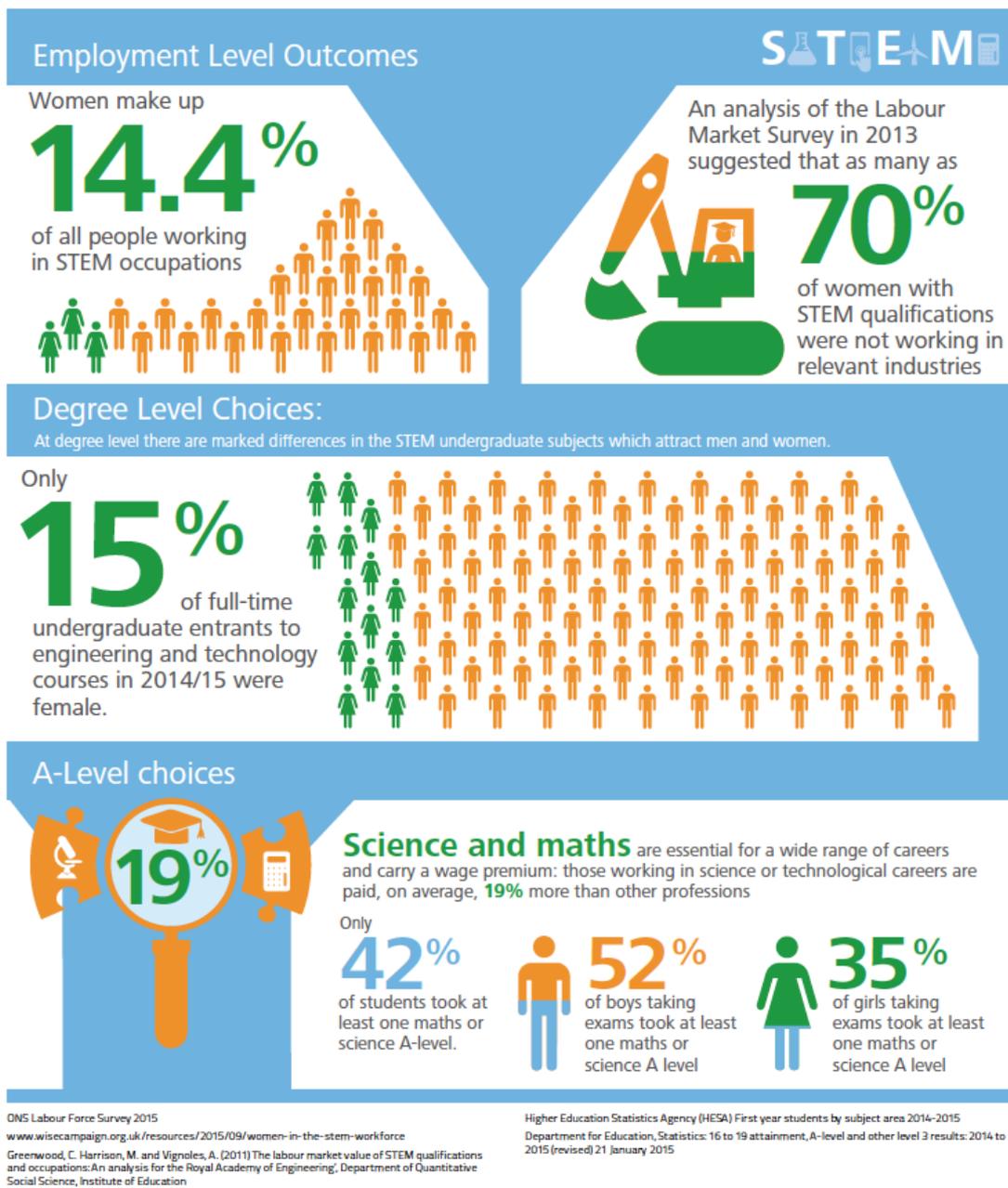


Figure 3 - The picture of STEM across the genders

- 3.7. The picture for primary and secondary education shows universal access to age 18 years but provisions varies widely with England introducing 'free schools' which allow freedom from Local Authority control for some schools. This is not available in other parts of the UK.
- 3.8. Vocational qualifications have received attention in both Scotland and Wales with progression to Higher Education being part of their policies<sup>13</sup>.
- 3.9. A useful comparison of provision is provided by the University Vocational Awards Council<sup>13</sup> on page 14 but is too detailed for this commentary. Further details of educational provision are also available in that report, including some gender differences (e.g. Figure 4 on page 23).

<sup>13</sup> [http://www.bbk.ac.uk/linkinglondon/resources/iag-and-progression-1/report\\_June2010\\_Progression%20from%20Voc%20Quals%20to%20HE%20Review\\_UKCE\\_S-1.pdf](http://www.bbk.ac.uk/linkinglondon/resources/iag-and-progression-1/report_June2010_Progression%20from%20Voc%20Quals%20to%20HE%20Review_UKCE_S-1.pdf) - accessed 2 June 2016.

- 3.10. The provisions for tuition fees and grants vary across the UK and depend on your country of residence as well as the university you choose. For a comprehensive explanation see *The Complete University Guide*<sup>14</sup>.
- 3.11. One of the biggest barriers to higher education for refugees is the fact that young people with Discretionary Leave to Remain (DLR)/limited leave for unaccompanied minors and those still in the asylum process are categorised as international students and are not entitled to Student Finance<sup>15</sup>.
- 3.12. The outcomes of the differing policies and practices across all forms of education provision need to be monitored carefully so that future developments can be based on evidence. Provision appears not to conform to the principles of the ICESCR.

#### 4. Modern Slavery – paras 19-29

4.1. The Modern Slavery Act 2015 is welcome but there are still significant gaps in its provisions, namely:

4.1.1. Independent Child Trafficking Advocates trial – the evaluation undertaken by the University of Bedfordshire<sup>16</sup> demonstrated that the role was successful in coordinating actions between various agencies and maintaining a holistic view of a child's life. The Government has decided to undertake further work on the issue. Nevertheless it is essential to ensure that interim measures are in place to provide appropriate care and support for every day child victims and that they are rescued and given the necessary support to rebuild their lives. We believe that further evaluation is unnecessary before universal roll-out although adjustments will probably need to be made over time..

4.1.2. James Ewins (Solicitor) undertook an Independent Review of the Overseas Domestic Worker (ODW) Visa<sup>17</sup>. He discovered a universally accepted phenomenon that ODWs are vulnerable to exploitation and sought to determine whether UK visa rules help to reduce that vulnerability or make it worse. He took an evidence-based approach to determining the impact of the ODW visa and concluded it is incompatible with the protection of their rights. He recommended that the Government end such visas and a mandatory meeting in a neutral location where an ODW is in the UK for more than 6 weeks, to give the individual an opportunity to speak about instances of abuse. However, the Government response, as recoded in the House of Commons Library on 13 May 2016 is as follows. "The Government has accepted many of the report's recommendations, but does not agree with reinstating a universal right to change employer and extend stay in the UK for two years. It successfully resisted an attempt to implement those recommendations through an amendment to the *Immigration Bill 2015-16*. Instead, it has changed the Immigration Rules in order to allow all migrant domestic workers to change employer (for any reason) during the validity period of their six month visa, and to enable domestic workers found to be a victim of trafficking or slavery to apply for limited leave to remain for up to two years, with permission to work

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<sup>14</sup> <http://www.thecompleteuniversityguide.co.uk/university-tuition-fees/going-to-university-in-scotland/> - access 2 June 2016.

<sup>15</sup> <https://refugeesupportnetwork.org/access-university> - accessed 2 June 2016.

<sup>16</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/486138/icta-horr86.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/486138/icta-horr86.pdf) - accessed 1 June 2016.

<sup>17</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/486532/0DWV\\_Review\\_-\\_Final\\_Report\\_6\\_11\\_15\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/486532/0DWV_Review_-_Final_Report_6_11_15_.pdf) - accessed 1 June 2016.

as a domestic worker (but no access to public funds).<sup>18</sup> We do not believe that someone in this position would be able to leave and find alternative employment within that time frame of 6 months.

4.1.3. The Government had intended to introduce a residence test for legal aid but this was declared ultra vires by the Supreme Court on 18 April 2016<sup>19</sup>. However, access to legal aid is restricted, not only for trafficked individuals or people seeking asylum, but more widely as described on the Citizen's Advice web site at <https://www.citizensadvice.org.uk/law-and-rights/legal-system/taking-legal-action/help-with-legal-costs-legal-aid/>. Thus many people are prevented from seeking legal redress due high legal costs, which they are unable to fund.

4.2. Members of the Human Trafficking Forum established by the Human Trafficking Foundation<sup>20</sup> continue to monitor provisions and to lobby for change and improvement for people caught up as victims in the trade of human beings.

## 5. Domestic and Gender based violence – paras 17, 18

5.1. Combating Violence Against Women and Girls (VAWG) is a central part of the Beijing Platform for Action (BPfA) and the Convention to End All Forms of Discrimination Against Women (CEDAW).

5.2. We welcome the Crown Prosecution Service's (CPS) strategy to combat VAWG<sup>21</sup>. This covers all the issues in which we are interested. The rise in referrals, charges, prosecutions and convictions is welcome but there is still much to be done. There are estimated to be many more incidents than their report<sup>22</sup> suggests but this is probably a combination of under-reporting by victims as well as missed opportunities by police and the CPS.

5.3. The failure to prosecute and convict more cases of Female Genital Mutilation (FGM), Honour Based Violence, and Forced Marriage is probably due to a mix of cultural and social reasons across ethnic groups and official bodies. These need to be addressed more openly and widely and, of course, improved monitoring will be essential.

5.4. Provision across the UK varies with separate legislation in all four countries. Wales is the only administration which has introduced a specific Act<sup>23</sup>. We feel that this is flagship legislation and its provisions could, with benefit, be adopted in other parts of the UK. The web site linked to the Act - <http://livefearfree.gov.wales/?skip=1&lang=en> - provides help and guidance.

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<sup>18</sup> <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN04786> - accessed 1 June 2016.

<sup>19</sup> <http://atleu.org.uk/news/2016/4/22/supreme-court-unanimously-strikes-down-residence-test-for-legal-aid> - accessed 1 June 2016.

<sup>20</sup> <http://www.humantraffickingfoundation.org/what-we-do/advisory-forum> - accessed 2 June 2016.

<sup>21</sup> <http://www.cps.gov.uk/publications/equality/vaw/> - accessed 2 June 2016.

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[http://www.cps.gov.uk/publications/docs/cps\\_vawg\\_report\\_2015\\_amended\\_september\\_2015\\_v2.pdf](http://www.cps.gov.uk/publications/docs/cps_vawg_report_2015_amended_september_2015_v2.pdf) - accessed 2 June 2016.

<sup>23</sup>

<http://www.senedd.assembly.wales/documents/s37622/Violence%20against%20Women,%20Domestic%20Abuse%20and%20Sexual%20Violence%20Wales%20Bill,%20as%20passed.pdf> - accessed 2 June 2016

5.5. There is also some protection in Wales for funding of refuges from 2017<sup>24</sup> – this may be too late for some. It is, however, a result of cuts to funding from the UK Government via the Barnett Formula. Concern in England for refuges is mounting with the closure of some centres and charities. This issue needs to be addressed urgently if vulnerable women and children are to be protected.

## **6. Abortion, sexual & reproductive health services in Northern Ireland (NI) – para 28**

6.1. Abortion law in NI is far stricter than in the rest of the UK and guidelines issued in March 2016 by the Northern Ireland Executive state that access to abortion is only permitted if a woman's life is at risk or there is a permanent or serious risk to her mental or physical health. Fatal foetal abnormalities, rape and incest are not circumstances in which abortions can be performed legally. The High Court recently ruled that this was incompatible with the human rights of women, but the law can only be changed by legislators.

6.2. Abortion policy was devolved to the Northern Ireland Assembly in 2010 as part of wider policing and justice powers under the Hillsborough Castle Agreement. But the Greens are the only Stormont party to support the full adoption of the same law as in England, Scotland and Wales.

6.3. A poll by Millward Brown for Amnesty International in 2014 suggested that 69% thought abortion should be legally available in the case of rape, 68% in the case of incest and 60% where there was a fatal abnormality in the foetus. However, when the Department for Justice in Northern Ireland conducted a consultation on abortion law in 2014, there were 712 individually written responses and 579 of those opposed change with 133 supporting change.

6.4. A proposal to legalise abortion in cases of fatal foetal abnormality was defeated in the Northern Ireland Assembly by 59 votes to 40. An amendment relating to pregnancies which are the result of rape or incest was defeated by an even wider margin. 'Precious Life' had vowed to "expose" any MLA who voted in favour of the new legislation.

6.5. Prior to the recent elections a statement from the Department of Health, to enquiries from soroptimists, said:

6.6. "I have been giving careful consideration to the proposal to create a working group to examine the issue of fatal foetal abnormality. The Executive has discussed this in recent weeks and I have also met with the Justice Minister about it. I am pleased that he and I have agreed to proceed with creating an inter-departmental working group composed of officials from both of our Departments. Whilst work is ongoing to finalise terms of reference for the working group, we both agree that it should engage with healthcare professionals and those people directly affected by fatal foetal abnormality, and take account of recent consultation on the question of legislative change, as it goes about its important work.

6.7. The Northern Ireland Executive approved guidance on Termination of Pregnancy in Northern Ireland for Health and Social Care professionals. The Guidance was circulated to staff on 26 March, and intended to provide clarity to them on the law framing termination of pregnancy in Northern Ireland and guide them in its application in clinical practice. It also advises on some of the factors that need to be taken into account during clinical assessment and management of

women for whom termination of pregnancy may be a consideration. A link to this guidance can be found here at -

<https://www.health-ni.gov.uk/sites/default/files/publications/dhssps/guidance-termination-pregnancy.pdf>

6.8. However, on taking office in January, First Minister Arlene Foster MLA said she did not support the extension of the 1967 Act to Northern Ireland. Since then there has been an election to the NI Assembly and the policy still has to be discussed and agreed although it is likely to be negative.

6.9. Women seeking termination will continue to have to travel to other parts of the UK for terminations. This is unacceptable in our view.

6.10. A review of sexual health services in NI was undertaken in October 2013<sup>25</sup>. It concluded that there is a clear need for strategic direction for such services in NI to include access for all wishing to avail themselves of such services and should include seamless services for both contraception and treatment of Sexually Transmitted Infections at the same clinic, as in other parts of the UK.

## **7. Irish Language – para 31**

7.1. The Belfast (Good Friday) Agreement<sup>26</sup> included recognition of respect, understanding and tolerance in relation to linguistic diversity, including in NI, the Irish language, Ulster-Scots and the languages of various ethnic communities.

7.2. The subsequent St Andrews Agreement (2006) included reference to strategies to implement this clause<sup>27</sup> in section 15. This was not amended in the 2007 revision<sup>28</sup>.

7.3. NHS Trusts have a policy in place for seeking agency support for people preferring to use the Irish language if staff caring for them do not speak it.

7.4. However, recent debates on the subject in a question-time session at Stormont reveal a lack of cross-party support. It is unlikely, therefore, that this will change in the near future, unlike the position in Wales over the Welsh language where there is equality between Welsh and English.

*Dr J Kay Richmond*

*Chairman*

*UK Programme Action Committee*

*2 June 2016*

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[http://rqia.org.uk/cms\\_resources/Specialist Sexual Health Services%20Report 09 OCT 2013 Published.pdf](http://rqia.org.uk/cms_resources/Specialist_Sexual_Health_Services%20Report_09_OCT_2013_Published.pdf) - accessed 2 June 2016.

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[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/136652/agreement.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/136652/agreement.pdf) - accessed 2 June 2016.

<sup>27</sup> [http://www.legislation.gov.uk/ukpga/2006/53/pdfs/ukpga\\_20060053\\_en.pdf](http://www.legislation.gov.uk/ukpga/2006/53/pdfs/ukpga_20060053_en.pdf) - accessed 2 June 2016

<sup>28</sup> [http://www.legislation.gov.uk/ukpga/2007/4/pdfs/ukpga\\_20070004\\_en.pdf](http://www.legislation.gov.uk/ukpga/2007/4/pdfs/ukpga_20070004_en.pdf) - accessed 2 June 2016.