



NORTHERN
IRELAND
HUMAN
RIGHTS
COMMISSION

**Submission to the Special Rapporteur on
Extreme Poverty and Human Rights'
Thematic Report to the UN General
Assembly on Digital Technology, Social
Protection and Human Rights**

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1.0 Introduction

- 1.1 The Northern Ireland Human Rights Commission (the NIHRC) was established in 1999. Pursuant to Section 69(1) of the Northern Ireland Act 1998, the NIHRC reviews the adequacy and effectiveness of law and practice relating to the protection of human rights.
- 1.2 The NIHRC welcomes the opportunity to contribute to this thematic report to the UN General Assembly on the digital protection and human rights.
- 1.3 In 2012, the UK Government committed to transform high volume public services to make them “digital by default”.¹ The UK Government stated that digital services must work for the “whole of society” and acknowledged that “financial exclusion and digital exclusion often go hand in hand.”² The Government therefore committed to providing “assisted digital services” and “alternative channels” for those unable to apply online.³
- 1.4 Despite such protections, the NIHRC is concerned that the drive to digitalise public services is leaving some behind. Evidence discussed below indicates that the introduction of digital technologies is having an adverse impact on categories of people including persons in receipt of social security, persons with disabilities, women and migrants.
- 1.5 This submission focuses on Universal Credit, Personal Independence Payment and the EU Settlement scheme, areas of particular concern to Northern Ireland in the context of social security reform and Brexit.
- 1.6 Aspects of the UK’s social security system has attracted criticism by the United Nations (UN) Committees on Economic and Social Rights,⁴ the Rights of the Child,⁵ the Rights of Persons with

¹ Cabinet Office, ‘Government Digital Strategy’ (CO, 2012).

² Cabinet Office and the Government Digital Service, ‘Government Transformation Service (CO and GDS, 2017), at 16.

³ Ibid, at 79.

⁴ E/C.12/GBR/CO/6, ‘UN Committee on Economic, Social and Cultural Rights, Concluding Observations on the Sixth Periodic Report of the UK of Great Britain and NI’, 14 July 2016.

⁵ CRC/C/GBR/CO/5, ‘UN Committee on the Rights of the Child, Concluding Observations on the Fifth Periodic Report of the UK of Great Britain and NI’, 3 June 2016.

Disabilities⁶ and, the Elimination of Discrimination against Women.⁷ The Commission has engaged with all these UN Committees.⁸

2.0 Universal Credit

- 2.1 Universal Credit replaces six means-tested benefits and tax credits for working-age claimants.⁹ For many households, Universal Credit makes up a significant amount, or all, of household income. According to Department for Work and Pensions (DWP) estimates, approximately 7 million households are expected to receive Universal Credit by March 2023.¹⁰ Universal Credit was introduced to Northern Ireland in September 2017, four years after Great Britain. In Northern Ireland, Universal Credit is administered by the Department for Communities (the Department).
- 2.2 The roll out of Universal Credit is less progressed in Northern Ireland than the rest of the UK, meaning limited data is available. Of the 12,000 new Universal Credit claims made in Northern Ireland by June 2018, 79 per cent of claims were made remotely and only 21 per cent of claimants attended the Jobs and Benefits Offices.¹¹

⁶ CRPD/C/15/R.2/Rev. 1, 'Inquiry concerning the United Kingdom of Great Britain and Northern Ireland carried out by the Committee under Article 6 of the Optional Protocol to the Convention', 6 October 2016; see also CRPD/C/GBR/CO/1, 'UN Committee on Rights of Persons with Disabilities Concluding Observations on the Initial Report of the United Kingdom of Great Britain and Northern Ireland', 3 October 2017.

⁷ CEDAW/C/GBR/CO/8, 'UN Committee on the Elimination of Discrimination against Women, Concluding Observations on the eight periodic report of the United Kingdom of Great Britain and NI', 8 March 2019.

⁸ NI Human Rights Commission, 'Submission to the UN CEDAW Committee: Parallel Report to the Eighth Periodic Report Submitted by the United Kingdom of Great Britain and NI' (NIHRC, 2019); NI Human Rights Commission, 'Briefing Paper: NI Human Rights Commission to the Committee on Discrimination Against Women during the 72nd Session's Pre-Sessional Working Group on the Examination of the United Kingdom's Compliance with the UN CEDAW' (NIHRC, 2019); NI Human Rights Commission, 'Submission to the UN Committee on the Elimination of Discrimination against Women: Parallel Report to the Eighth Periodic Report Submitted by the United Kingdom of Great Britain and NI' (NIHRC, 2018); NI Human Rights Commission, 'Submission to the UN Committee on Economic, Social and Cultural Rights 58th Session on the Sixth Periodic Report of the United Kingdom's Compliance with ICESCR' (NIHRC, 2016); NI Human Rights Commission, 'Submission to the UN Committee on the Rights of the Child 72nd Session on the Periodic Report of the United Kingdom of Great Britain and NI', (NIHRC, 2016); NI Human Rights Commission, 'Submission to the UN Committee on the Rights of the Child on the United Kingdom's Fifth Periodic Report on compliance with the UN Convention on the Rights of the Child' (NIHRC, 2015); UK Independent Mechanism, 'Disability rights in the UK: UK Independent Mechanism Submission to inform the CRPD List of Issues on the UK' (UKIM, 2017); Independent Mechanism for NI, 'Disability rights in NI: Supplementary submission to inform the CRPD List of Issues on the UK' (IMNI, 2017); UK Independent Mechanism, 'Monitoring the Implementation of the UN Convention on the Rights of Persons with Disabilities: the UK Independent mechanism list of issues interim report' (UKIM, 2014). All submissions available on the Commission's website www.nihrc.org

⁹ Universal Credit replaces Child and Working Tax Credits, Housing Benefit, income-based Jobseeker's Allowance, income-related Employment and Support Allowance and Income Support.

¹⁰ House of Commons Library, 'Briefing Paper Number 8299: Universal Credit roll-out: 2018-19' (HoC, 2018), at 3.

¹¹ NI Audit Office, 'Welfare Reforms in Northern Ireland' (NIAO, 2019), at 39.

- 2.3 Across the UK, Northern Ireland continues to have the highest proportion of internet non-users.¹² While the number of internet non-users has declined since 2012, it is a real concern that almost 15 per cent of Northern Ireland do not use the internet.¹³ Persons with disabilities are four times more likely than non-disabled persons to be offline. Research also shows that non-internet users are likely to be female and not economically active.¹⁴ These are also the categories of people most likely to be adversely affected by social security reforms.¹⁵
- 2.4 A compounding issue in Northern Ireland is the lack of internet services in rural areas. Northern Ireland has a larger rural community per head of population than other regions of the UK.¹⁶ According to Ofcom, 23 per cent of rural premises in Northern Ireland do not have basic broadband services, compared to 1 per cent in urban areas.¹⁷
- 2.5 UK-wide research conducted by DWP finds that claimants with “irregular or no access to the internet also consistently showed signs of faring less well throughout the Universal Credit customer journey”.¹⁸
- 2.6 The Northern Ireland Executive’s draft Programme for Government commits to “improve internet connectivity”.¹⁹ This is in recognition that “for consumers and households the continued onset of the digital age means that broadband connectivity is now increasingly relied on for accessing all sorts of services, information access and storage, and various leisure and recreational activities.”²⁰ There is, however, no specific commitment to improve digital skills or literacy within the population.

¹² Office for National Statistics, ‘Exploring the UK’s digital divide’ (ONS, 2019) at 7.

¹³ Ibid.

¹⁴ Ibid, at 14 and 10. 22.5 per cent of internet non-users are in the economically inactive (long-term sick/disabled 12months+) category. Other categories i.e. employees, self-employed, ILO unemployed comprise under 3 per cent of other internet non users).

¹⁵ Equality and Human Rights Commission, ‘The cumulative impact of tax and welfare reforms’ (EHRC, 2018), at 173.

¹⁶ The latest statistics from the Department of Agriculture, Environment and Rural Affairs show that 37 per cent of the NI population live in rural areas and 63 per cent live in urban areas. Department of Agriculture, Environment and Rural Affairs, ‘NI Rural-Urban Statistics’ (DAERA, 2018). In comparison, the latest UK Government statistics show 17 per cent of the population in England live in rural areas and 83 per cent live in urban areas; see Department for Environment, Food, and Rural Affairs, ‘Rural Population and migration mid year population 2017’ (DEFRA, 2018) at 1.

¹⁷ Ofcom, ‘Connected Nations 2017 report’ (Ofcom, 2017) at para 2.5.

¹⁸ Department for Work and Pensions, ‘Universal Credit Full Service Survey June 2018’ (DWP, 2018), at 17.

¹⁹ Northern Ireland Executive, ‘Draft Programme for Government Framework 2016-21’ (NI Executive, 2016) at 85.

²⁰ Ibid.

- 2.7 The NIHRC acknowledges that the UK Government has taken steps to ensure non-digital access to Universal Credit, yet the NIHRC remains concerned about the effectiveness of current measures. Indeed, the former Parliamentary Under-Secretary of State for Work and Pensions, Justin Tomlinson, agrees “there is still much more to do” to ensure Universal Credit is accessible and practically available to claimants.²¹
- 2.8 In Northern Ireland, the Make the Call service, a helpline to ensure people are getting the benefits they are entitled to, has been established. However, there is lack of awareness of this option and there are concerns that it is not fully accessible for migrants and persons with disabilities.²² Potential claimants, particularly those with disabilities, are also afraid to engage with this programme for fear that their benefits will be reduced or completely removed.²³
- 2.9 In 2016, the UK Government, with the aim of making it safe, quick and easy to verify an individual’s identity to access government services, including claiming Universal Credit, introduced the ‘Verify’ online service. Yet, only 38 per cent of Universal Credit claimants have been able to create a Verify user account.²⁴ Claimants unable to use Verify must instead confirm their identity in person, for example, at the Jobs & Benefits Office. The limited availability of Verify is attributed to Universal Credit claimants not having strong digital footprints.²⁵ The Public Affairs Committee concludes that the Verify service is “onerous” and “not fit for purpose”.²⁶
- 2.10 Making a Universal Credit claim is one challenge, maintaining a claim is another. Many claimants are expected to be able to demonstrate that they have spent up to 35 hours a week actively searching for work. Claimants are also expected to log on to their

²¹ Parliamentary Business, ‘Department for Work and Pensions: Members’ Representations’, Westminster Hall, 16 January 2019, at column 407WH.

²² NI Human Rights Commission, ‘Submission to the UN CEDAW Committee: Parallel Report to the Eighth Periodic Report Submitted by the United Kingdom of Great Britain and Northern Ireland’ (NIHRC, 2019), at 34; UK Independent Mechanism, ‘Progress on Disability Rights in the United Kingdom: UK Independent Mechanism Update Report to the UN Committee on the Rights of Persons with Disabilities’ (UKIM, 2018), at 23.

²³ UK Independent Mechanism, ‘Progress on Disability Rights in the United Kingdom: UK Independent Mechanism Update Report to the UN Committee on the Rights of Persons with Disabilities’ (UKIM, 2018), at 23.

²⁴ Public Accounts Committee, ‘Accessing public services through the Government’s Verify digital system’ (PAC, 2019) at para 16.

²⁵ Ibid.

²⁶ Public Accounts Committee, ‘Accessing public services through the Government’s Verify digital system’ (PAC, 2019) at para 2.

Universal Credit account and use their online journal regularly.²⁷ While a claimant who lacks digital skills might obtain assistance in making the initial claim (for example, by attending a Job and Benefits Office), obtaining such assistance every time an update is needed to an online journal may be impractical.

- 2.11 Universal Credit claimants with limited English language skills face additional difficulties. Interpretation can be provided at the point of Universal Credit claim, but completing the online journal in English requires regular language support, which may be difficult to obtain. The NIHRC is aware of ongoing problems, for example, Farsi speaking refugees in Northern Ireland are struggling to keep journals due to lack of support. Failure to maintain the journal gives rise to the risk of sanctions.²⁸ The NIHRC has raised this issue with the Department for Communities. Other groups are also more likely to struggle with a digital approach include individuals with literacy problems, learning difficulties, those who cannot afford a computer or smartphone of their own, etc.
- 2.12 The DWP guidance outlines different types of support that can be provided to claimants.²⁹ However, guidance specifies that assistance such as telephone or home visits should only be “offered in exceptional circumstances”,³⁰ and indicates that claimants facing difficulties should seek assistance from family and friends. The NIHRC is concerned that this runs counter to the ethos of the UN Convention on the Rights of Persons with Disabilities of respecting the individual autonomy of persons with disabilities³¹ and could leave some claimants vulnerable to economic abuse.³²

²⁷ Claimants should use their online journal to respond to their To Do list, record job searches, keep in touch with their Work Coach and report any changes in circumstances; see Universal Credit / Learn My Way, ‘Leaflet: Universal Credit Your Online Journal’ available online: <https://www.learnmyway.com/files/Universal-Credit-Your-Online-Journal.pdf>

²⁸ A claimant fails to comply for no good reason with a requirement connected to a work related activity / outlined in Claimant Commitment may be sanctioned, see Department for Work and Pensions, ‘Advice for Decision Making: Chapter K1: Sanctions – general principles’ (DWP, 2019).

²⁹ Department for Work and Pensions, ‘UC Full Service guidance: Assisted digital overview’ (DWP, 2018); accessible here: http://data.parliament.uk/DepositedPapers/Files/DEP2019-0465/Assisted_Digital_v9.0.pdf

³⁰ Ibid.

³¹ Article 3, UN Convention on the Rights of Persons with Disabilities.

³² The UK is working towards ratification of the Istanbul Convention, which requires States to provide protections against all forms of domestic violence including economic abuse at Article 3; see Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence, 2011.

2.13 Household payments are the default for Universal Credit.³³ In Northern Ireland, separate Universal Credit payments to an individual partner are permitted in exceptional circumstances. Domestic violence is a recognised exception, but the burden is on the claimant to declare their circumstances.³⁴ The existence of this exception is also not clear within the Department for Communities guidance on Universal Credit.³⁵ Currently separate payments are practically unavailable, as the computer system is not able to process such requests. NIHRC understand that just four separate payments have been made in Northern Ireland to date.³⁶

2.14 Those that make applications in person may be able to avail of an unofficial system, where separate payments are calculated and facilitated by hand, but this depends on awareness of this option within the Jobs and Benefits staff. Such an option is not available to online claimants.³⁷

2.15 The NIHRC recommends that:

a) The prevalence of digital exclusion is taken into account at all stages in policy design, including the requirement to consider reasonable accommodation that may be

³³ The default option for couples applying for Universal Credit is to make a joint application. If successful, Universal Credit will be paid in single payments into one bank account. This can be an individual or joint bank account.

³⁴ To ensure the financial responsibilities in the home are adequately reflected and to protect victims of domestic violence, split Universal Credit payments should be the default option. The nature of domestic violence means a joint claimant that is a victim of domestic violence may not be in a position or may not want to declare their circumstances. Split payments have received support among MPs; see Department for Work and Pensions, 'Guidance Universal Credit: Further Information for Families' (DWP, 2019); roundtable discussions with NI women's policy groups and NI women's community groups, October 2017, November 2017, February 2018 and March 2018; Parliamentary Business, 'Universal Credit Split Payments' Westminster Hall, 10 October 2018 at Column 141WH.

³⁵ Department for Communities, 'Advice for Decision Making Chapter B1: Payment of UC, PIP, ESA and JSA' (DfC, 2017), at Section B1026.

³⁶ Correspondence between Department for Communities and NI Human Rights Commission, 29 April 2019.

³⁷ Claimants can apply for Universal Credit online or in person. The majority of new Universal Credit claimants are using the online process. Within the online process, an applicant is only able to provide one bank account per application. The Department for Communities has responsibility for managing social security in NI, but it must use the computer system provided by the UK Department for Work and Pensions. This computer system is under review, which is to be completed by 2023. On completion of the review, new Universal Credit claimants will be able to choose whether their benefit is paid in a single payment to an individual's bank account or a joint bank account, or if the payments are split across two bank accounts. However, in the interim claimants must apply for split payments in person. It was reported that there is a lack of awareness within staff and the wider community that split payments are an option and even when applying in person that new claimants may be directed to the online application process. It was reported that of the new Universal Credit claimants in NI, 10 per cent (3,500) are couples and the vast majority of payments are made into the woman's bank account. It was raised that this may change as Universal Credit is rolled and the demographics of new claimants changes; see Women's Policy Group Meeting, Dungannon, 12 December 2018. This is in contrast to the tax credits system, being replaced by Universal Credit, where a joint claim for Child Tax Credit and childcare element of Working Tax Credit is paid into the account of the main carer. In practice, this is usually the woman.

required, particularly for persons with disabilities and migrants.

- b) Effective education and training programmes are developed, implemented and adequately funded to improve digital literacy.**
- c) Steps are taken to ensure everyone has access to effective and affordable digital services. This may include offering free, accessible public internet services.**
- d) Disaggregated data is collected, monitored and evaluated on instances where and reasons why social security claimants have not been able to make or maintain a social security claim.**
- e) Effective steps are taken to raise awareness of and ensure non-digital channels and support for Universal Credit claimants are fully available and accessible. The exceptionality threshold necessary to access digital support should be removed.**
- f) Sanctions are not imposed for non-compliance with government requirements due to lack of digital skills.**
- g) Separate social security payments are the primary option for Universal Credit.**

3.0 Personal Independent Payment

- 3.1 While the digital nature of Universal Credit poses some difficulties for claimants (as highlighted above), the lack of digital access for other social security benefits can equally hamper accessibility. A particular example is Personal Independence Payment, which is a benefit for persons who are of working age and who need daily help because of a long-term illness, disability or mental health condition.
- 3.2 In Northern Ireland, the initial stage of the Personal Independence Payment application requires telephone communication, which is

frustrating for claimants with certain medical conditions and those with speech and/or hearing impairments. Having undertaken the initial telephone conversation, the claimant is then required to complete an application form by hand and return it by post.³⁸

3.3 Respondents to the Independent Reviewer of the PIP Assessment Process highlighted the difficulties they encountered in making a claim due to the lack of digital options. This prompted the Independent Reviewer to recommend that the Department for Communities provides “suitable, accessible options” for claimants wishing to apply and that training is reviewed to ensure that staff are fully aware of the “options available for claimants who find it challenging or impossible to communicate by telephone”.³⁹ The Department has accepted this recommendation.⁴⁰

3.4 The NIHRC further notes that other types of financial support– such as Discretionary Support⁴¹ – are not currently accessible through digital means; instead claimants are directed to apply by telephone.

3.5 The NIHRC recommends that:

a) The application process for social security benefits, particularly those concerning persons with disabilities, is fully accessible and provides for reasonable accommodation. This includes periodically monitoring and evaluating these processes and taking the required actions to address any inaccessibility issues.

b) Effective training on accessibility is provided to all staff that interact with social security claimants, with a particular focus on persons with disabilities.

³⁸ Walter Rader, ‘Personal Independence Payment: An Independent Review of the Assessment Process NI’ (DfC, 2018), at para 139.

³⁹ Ibid, at 44.

⁴⁰ Department for Communities, ‘Review of the Personal Independence Payment Assessment Process: Department for Communities’ Interim Response’ (DfC, 2018) at 13.

⁴¹ Discretionary Support is unique to NI and aims to alleviate the most exceptional, extreme or crisis situations that present a significant risk to the health, safety or wellbeing of low-income households through the provision of practical support.

4.0 EU Settlement Scheme

- 4.1 Due to the UK leaving the European Union (EU), all European Economic Area (EEA) citizens living in the UK will be required to register with the EU Settlement Scheme in order to secure their entitlements post-Brexit. The EU Settlement Scheme, which went live on 30 March 2019, is managed by the Home Office. The deadline for applying to the scheme is either 30 June 2021 or 31 December 2020, depending on whether the UK leaves the EU with a deal.
- 4.2 EEA citizens who do not apply for settled status before the deadline may lose their right to live, work and access social security in the UK. Therefore, the ability to secure Settled Status is essential for EEA nationals in safeguarding their future access to social protections.
- 4.3 The EU Settlement Scheme application process is online and applicants must download an app to make the application. The application process marks a significant departure from previous Home Office applications, which often involve lengthy application forms. By comparison, most applicants to the EU Settlement Scheme will find it relatively faster and simpler. In determining EU Settlement applications, the Home Office has also adopted the principle of “evidential flexibility” whereby decision makers work with claimants to avoid “any errors or omissions” and to obtain supplementary documentation if required.⁴²
- 4.4 The Home Office has established an ‘Assisted Digital Service’, which can provide telephone and face-to-face assistance to EEA citizens who lack the digital skills to complete the application process. This is welcomed. However, the service is currently only available in two locations in Northern Ireland: Lisburn and Dundonald,⁴³ with an outreach service available from a further location.⁴⁴ None of these locations are home to significant migrant populations.⁴⁵ The Home

⁴² Home Office, ‘EU Settlement Scheme: Statement of Intent’ (HO, 2018), at para 5.15.

⁴³ The Assisted Digital Service is available in Dundonald and Lisburn.

⁴⁴ The Assisted Digital Service can provide home visits in the Bangor area.

⁴⁵ The five largest Local Government Districts for international migration for the year ending mid-2017 were: Belfast; Armagh City, Banbridge and Craigavon; Newry, Mourne and Down; Mid Ulster; Mid and East Antrim. See NI Statistics and Research Agency, ‘Long-term International Migration Statistics for NI (2017)’ (NISRA, 2018), at 11-13.

Office is currently “unable to advise... on whether there are plans to open up any further locations”.⁴⁶

- 4.5 Registration to the EU Settlement Scheme is relatively straightforward for those who have a continuous record of national insurance contributions through employment. However, registration is more difficult for EEA migrants who cannot prove their work history or proof of address and who do not have bank accounts. A 2017 study estimated that 150,000 non-Irish EU citizens living in the UK were economically inactive, primarily because they were looking after family members (90 per cent of these people were women); such citizens may struggle to provide the necessary documentation for registration.⁴⁷
- 4.6 The NIHRC is aware that members of the Roma community are wary about applying.⁴⁸ Evidence shows that Roma are over-represented in precarious low-paid jobs and that overcrowding in substandard accommodation is prevalent.⁴⁹ Both factors would point to a difficulty in producing required documentation of employment and residence, which will hinder eligibility to EU Settlement. The NIHRC welcomes the Home Office’s funding of £9 million for community organisations to support vulnerable individuals applying for Settled Status.⁵⁰
- 4.7 The Joint Committee on Human Rights,⁵¹ the House of Lords EU Justice Sub Committee⁵² and the Exiting the EU Committee⁵³ have all raised concerns that physical proof of status will not be issued to applicants; instead, applicants will receive an electronic code that proves their status. Individuals should have the opportunity to

⁴⁶ Correspondence between the Home Office and NI Human Rights Commission, 30 April 2019.

⁴⁷ The Migration Observatory, ‘Unsettled status? Which EU citizens are at risk of failing to secure their rights after Brexit?’ (TMO, 2018), at 18.

⁴⁸ Reasons for reluctance include: general wariness of national registration requirements, a lingering worry about the fee (the £65 fee which was first imposed has now been waived), a concern that people who have received civil penalties or have criminal records for minor offences may not be eligible, etc.

⁴⁹ Joseph Rowntree Foundation, ‘Poverty and Ethnicity in NI: an evidence review’ (JRF, 2013).

⁵⁰ Home Office, ‘Press release: funding available to support vulnerable EU citizens apply for settled status’, 10 April 2019.

⁵¹ House of Commons and House of Lords Joint Committee on Human Rights, ‘Legislative Scrutiny: Immigration and Social Security Co-ordination (EU Withdrawal) Bill, Eighteenth Report of Session 2017-19’ (JCHR, 2019), at 9.

⁵² Correspondence between Baroness Kennedy, Chair, EU Justice Sub-Committee, to Rt Hon Sajid Javid MP, Home Secretary, regarding EU Settlement Scheme, 27 February 2019; available at <https://www.parliament.uk/documents/lords-committees/eu-justice-subcommittee/CWM/HKtoSJ-SettledStatus-260219.pdf>

⁵³ House of Commons Exiting the European Union Select Committee, ‘The progress of the UK’s negotiations on EU withdrawal: the rights of UK and EU citizens, Eighth Report of Session 2017-19’ (HoC, 2018) at 9.

acquire a physical document as evidence of their right. This is particularly important for persons who have limited digital skills. Physical proof will also provide some reassurance to EU citizens who are worried about their status. Similarities have been drawn with the Windrush Generation who had difficulties in proving their rights and entitlements and the UK Government is urged to act now to avoid a similar issue arising for EU citizens.⁵⁴

4.8 The Home Office has not yet set out how it will respond post-Brexit to EEA citizens who have not applied to the EU Settlement scheme, due to a lack of digital skills.

4.9 The NIHRC recommends that:

- a) sufficient assisted digital support locations are available.**
- b) physical proof of Settled Status is provided.**
- c) funding for independent, culturally sensitive advice and support for vulnerable individuals applying for Settled Status is adequate and effectively monitored.**
- d) A commitment is given that, post Brexit, EEA citizens who lack digital skills will be provided with the required assistance and protected from immigration enforcement while they assisted with registering with the EU Settlement scheme.**

⁵⁴ House of Commons and House of Lords Joint Committee on Human Rights, 'Legislative Scrutiny: Immigration and Social Security Co-ordination (EU Withdrawal) Bill, Eighteenth Report of Session 2017-19' (JCHR, 2019), at 9.

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