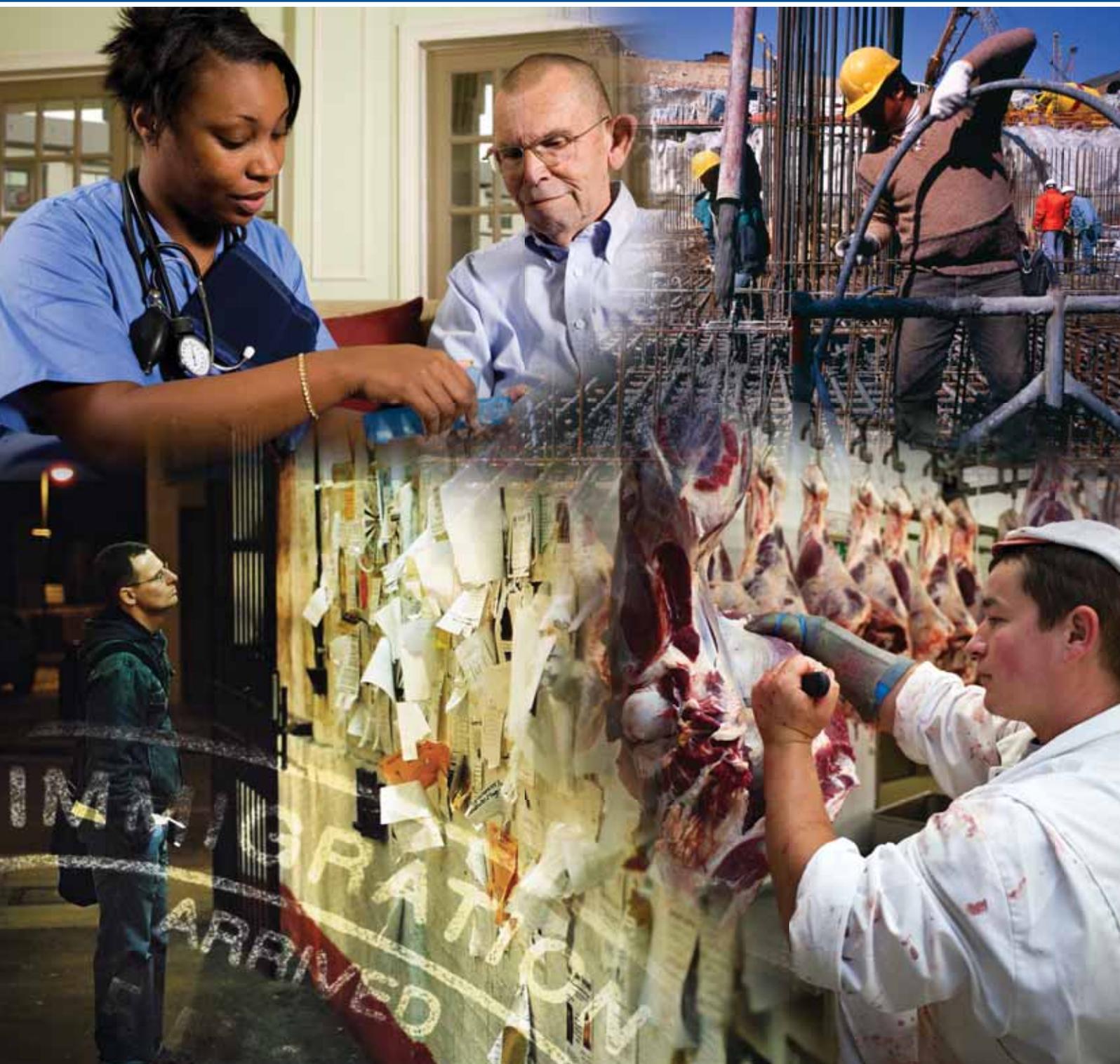


Equality Commission

FOR NORTHERN IRELAND

The Role of the Recruitment Sector in the Employment of Migrant Workers.



A Formal Investigation

Foreword

Recent years have seen a significant change in the composition of the population in Northern Ireland, with many people coming to live and work here. Most of them are our fellow citizens in the European Union; all of them are now our neighbours. Some of them will come for a short period and some will come to stay, to settle, to set down roots, to make their homes here and to raise their families here. It is difficult to imagine a more positive statement about Northern Ireland than to want to make it home.

There are many real and gritty reasons why people leave their countries of origin and seek their future in another place. Some of those reasons are economic. But those who come here do not come simply as economic units. They come as complete human beings with all the aspirations, all the virtues, all the failings, all the potential as the rest of humanity. They also come with entitlements to be treated fairly.

For most, the process of finding a job is the crucial first step in becoming part of the life of the community. For a significant number, recruitment agencies are the way to find work; for many it will be a relationship that endures for a long time. The Equality Commission decided to conduct an investigation into the role of employment agencies and businesses in the employment of migrant workers and to explore whether that involvement creates any barriers to equality of opportunity.

There are advantages that derive from the recruitment sector. It allows people to obtain work relatively quickly and it can give them that necessary starting point in their new life. But it also means that they are employed as temporary workers and they will not have the same terms and conditions as direct employees. The minimum wage may often be their maximum.

The Commission's investigation found areas of good practice in the recruitment sector, on the part of government agencies and among community support groups. These agencies and groups do much good in making the task of finding work easier and more accessible.

The investigation also found that while there is a considerable body of legislation governing the recruitment sector, not all recruitment agencies work within its terms and barriers to equality of opportunity do exist for those who use their services. The experiences recounted during the investigation show that many workers encounter problems, find it difficult to obtain work that matches their qualifications and are confined to irregular and temporary work. Difficulties of consistency in payment and, in particular, a real and substantial difficulty with language were also identified as issues.

One of the key challenges for Northern Ireland is to ensure that those who come to live and work here are treated with dignity and fairness, that their contribution to the economy and to wider society are recognised and that they are accorded the same respect and value that people from Northern Ireland expect when they go abroad to live and work.

In commending this report to the careful attention of all who have any involvement in or association with new residents in Northern Ireland, I wish to express my thanks to all who contributed to its preparation. In particular, I thank my fellow Commissioners who conducted the investigation and the members of the Commission staff who so ably assisted them. The report makes important and positive recommendations to help the recruitment sector to recognise and to comply with the law and to assist migrant workers to understand and vindicate their entitlements. The Commission will take appropriate action to address the issues highlighted in the investigation and to ensure that its recommendations are implemented.

Bob Collins
Chief Commissioner

Introduction

The Equality Commission for Northern Ireland [hereafter, the Commission] has the duty under the Race Relations (NI) Order 1997 to work towards the elimination of race discrimination, and to promote equality of opportunity and good relations between persons of different racial groups. Article 46 empowers the Commission to carry out formal investigations for any purpose connected with the performance of its duties.

In September 2008 the Commission began a formal investigation into the role of the recruitment sector in the employment of migrant workers in Northern Ireland.

The need for investigation in this area

The Race Relations legislation makes it unlawful to discriminate against a person on the grounds of race, nationality or ethnic origin in the provision of services and in employment matters. Recruitment agencies provide both services and employment.

The Commission was aware that:

- There has been significant immigration to Northern Ireland in recent years, particularly from Eastern European countries.
- Research suggests that the recruitment sector plays a considerable role in finding work for new residents in Northern Ireland.
- There is a high proportion of migrant workers in particular job sectors in Northern Ireland many of which are low skilled and low paid.

The Commission, therefore, wanted to establish the extent of the role of the recruitment sector in the recruitment and employment of migrant workers, and evaluate the implications of that role in terms of equality of opportunity. In particular, we were keen to identify if barriers to equality of opportunity exist where migrant workers are recruited or employed by the recruitment sector and, if so, to make appropriate recommendations for change.

The investigation team spoke to many migrant workers through focus groups. In addition, participants were asked to complete a short questionnaire which provided personal information, for example, their educational and professional qualifications and employment history. The majority of participants were Eastern European nationals, many of whom have become resident in Northern Ireland since 2004.

During focus group meetings we explored the extent of participants' involvement with recruitment agencies and identified a number of issues arising from this relationship. We subsequently discussed these issues with a sample of recruitment agencies across Northern Ireland, and with a number of employers who either used the recruitment sector for labour, and/or directly employ a large proportion of migrant workers.

Main Findings

Participants' experiences indicate that certain barriers to equality of opportunity exist for those using the recruitment sector.

Although some participants were content with the work they found through a recruitment agency many participants reported discontent with the irregularity of work, the types of work found and the lack of security of temporary agency work.

Using the recruitment sector

The recruitment sector plays a considerable role in the recruitment and employment of migrant workers in Northern Ireland. More than half of participants had used the recruitment sector and participating recruitment agencies reported a high proportion of migrant workers registered with them; in some cases more than 80% of registered work seekers.

Participants using recruitment agencies may have been recruited in their own country for specific jobs in Northern Ireland. Others reported that they registered with a recruitment agency or agencies after arriving in Northern Ireland. Often migrants wanted to find work as quickly as possible or had been unable to find work by direct approaches to employers and were prepared to do any type of work.

Using the recruitment sector was an initial strategy for gaining employment for some participants; however, other participants continued their relationship with the recruitment agency, in some cases for a number of years. It was not until participants had been in Northern Ireland for 5 years or more that they moved on in large numbers from agency work to direct employment.

Of those participants using the recruitment sector, 27% had gone on to find direct employment, while 52% remained as agency workers. The remainder were no longer working.

Using overseas agencies

Of particular concern were the reported experiences of those who had been recruited through agencies in their own country for work in Northern Ireland. There were reports of large amounts of money being paid to find jobs which were not as expected. Participants were deceived about the type of work they would be doing: about terms and conditions and in some cases about location. In some instances participants were particularly vulnerable to poor employment practices when, despite their best efforts, they did not have proper work permit documents.

We paid 600 euro to the agency and then £500 to a contact in the UK who said he would get us work documents. We never got these. We knew only that we would be doing unskilled work in Belfast. We work on a farm and the job is not what we expected.

Types of work found

Participants were mainly employed as temporary agency workers by a recruitment business to carry out work for an end-user who would otherwise be the employer. Finding temporary work through the recruitment sector means that agency workers will not necessarily have the same terms and conditions as direct employees. This, of course, affects all temporary agency workers and not just migrant workers. However, there appears to be a disproportionate representation of migrant workers in temporary agency work; in some job sectors migrant workers made up over 95% of the temporary agency workforce.

Few participants found employment matching their qualifications and work experience. Participants employed by recruitment agencies generally filled jobs paying National Minimum Wage.

Most participants had worked as production operatives at some stage, with 48% of those who have worked in the food processing industry having found this work through the recruitment sector. It was also evident that participants working through recruitment agencies tended to remain working in one job sector; 82% of these participants had worked in only one job sector since arriving in Northern Ireland.

I think that migrant workers only get low paid work through recruitment agencies. Sometimes it takes a while to get work and then it is only for a few hours.

Language barriers

Many participants [72%] felt that language was a major barrier when registering with and working through recruitment agencies. The following language barriers were reported:

- initial registration:
This investigation has demonstrated how difficult the initial registration process can be for those who have limited English. It appears that some recruitment agencies are aware of this problem and have made adjustments to the process, whereas registration with other agencies is impossible for migrant workers with limited English.

We couldn't register with one agency because our English is not very good. We don't understand why. This agency is filling the same jobs as other agencies in the area.

- understanding key documents:
Participants regularly reported that they did not fully understand the document they had signed. Many did not receive written information in a language which they understood and are, therefore, disadvantaged when it comes to understanding key documents and employment protections.

I got a contract written in English. The agency staff completed it and I signed it. But I didn't understand it.

- obtaining permanent and higher skilled work using qualifications:
Recruitment agencies conduct assessment tests on behalf of clients or for their own records. These include English language and other skills tests. Participants were mainly placed in work which required basic English skills only. Participants also reported difficulties in having qualifications gained outside the UK recognised by employers.
- raising complaints and asserting rights:
Language barriers contributed to participants' lack of ability to assert their rights. There was also evidence that participants were unaware of their entitlements in the first place and that a fear of losing work meant they were reluctant to complain.

Terms and conditions

The main terms and conditions of service of agency worker participants, including pay, were generally inferior to those enjoyed by direct employees, even when participants were employed as agency workers for substantial periods, or when they worked alongside direct employees. The European Union aims to address this through the Temporary Agency Workers Directive which is to be incorporated into domestic law by October 2011. In Great Britain the legislation will be subject to a 12 week qualifying period. Issues raised included:

- 20% of participants did not receive a copy of their contract or did not receive a copy for some time.
- Participants did not receive their full statutory entitlements.

We have trouble getting holiday pay from the agency. They don't want to speak to us about it. They said that if we don't like it we could always go back home.

- Many participants did not have guaranteed weekly working hours; instead they worked through recruitment agencies on an "as and when required" basis. This created problems not only because of the irregularity of working hours but because the recruitment agencies did not have any clear and transparent system of allocating available work amongst the workers.

We don't have any guaranteed hours each week. Sometimes we only work 2 days a week and sometimes only 1 hour a day. Others get 5 days work each week plus overtime. The system for choosing who works is unfair.

- Participants were expected to work long hours, often without overtime rates being paid and in some cases contrary to the Working Time Regulations.
- Working Time Regulation opt out clauses were often included with contracts; giving the impression that opting-out was a condition of being offered work.

Pay and administration

Errors and delays in pay were frequently reported by participants, as were grievances about holiday pay and other statutory entitlements. The majority of agency worker participants [60%] stated that they experienced difficulties with pay.

We have to check our payslips every week to make sure we are paid for all the hours we have worked. There have been too many mistakes.

Participants reported receiving payslips, however, in some cases the information contained was insufficient for proper understanding of pay received. Administrative problems led to workers not receiving pay on time.

Delays by recruitment agencies producing key documents were reported as a major problem in gaining further employment or establishing entitlement to social security benefits.

Employment discrimination

Almost one third of agency worker participants [31%] felt that they had experienced discrimination as a result of working through the recruitment sector. They thought that they were discriminated against because of their nationality and also because they were agency workers. They identified their treatment by supervisors, both local and migrant worker supervisors, as discriminatory.

- Recruitment agencies may employ migrant staff as recruitment consultants in their offices and as supervisors to manage agency workers. Participants perceived that these employees discriminate against certain nationalities at the registration stage, at the place of work and when choosing workers for shifts.

The same people get picked for work all the time, and to do overtime. The supervisors only choose people of their own nationality.

- Participants alleged that they had been instructed not to speak in languages other than English in the workplace, for example, over lunch or other breaks from work.

It is unlawful to discriminate on racial grounds. The Commission can provide advice and assistance to individuals who believe they may have suffered unlawful race discrimination and who wish to pursue a complaint through the Industrial Tribunal system.

Good practice

The investigation has also highlighted good practice by the recruitment sector, related government agencies and community support groups who have recognised the many challenges faced by migrant workers. These aim to make the process of finding work in Northern Ireland easier and more accessible and are reported in Section 7 of the main report. We also include a number of links to useful sources of information for both the recruitment sector and migrant workers.

Conclusions and Recommendations

Whilst it is not the only route into employment, the recruitment sector is a popular way to find work for migrants with a wide range of skills and abilities. For some migrant workers using the recruitment sector is not just an initial introduction to work but rather an employment relationship which may last for some years.

The recruitment sector in Northern Ireland is heavily regulated under legislation for which the Department for Employment and Learning, the Department of Agriculture and Rural Development and the Gangmasters Licensing Authority have enforcement responsibility.

Despite this comprehensive set of legislative protections there is evidence that there are recruitment agencies who are not working within the legislation and that migrant workers experience problems in terms of recognising and asserting their rights.

Many of the problems experienced by migrant workers are caused by language barriers and could be addressed through proper understanding of terms and conditions and related policies and procedures. This should be a priority for the recruitment sector.

Some of the issues raised by participants may apply to anyone using the recruitment sector to find work in Northern Ireland. However, migrant workers are more vulnerable because of English language difficulties and limited knowledge of their rights and the support systems in place to assist them.

Our recommendations aim to ensure that:

- information about rights is available and accessible to migrant workers in their local communities
- recruitment agency staff are aware of their obligations under anti-discrimination legislation
- there is equal opportunity for migrant workers who wish to obtain work using their qualifications skills and experience to do so.

Key Recommendations

- All recruitment agency staff should receive training in anti-discrimination legislation.

The recruitment sector cannot discriminate against migrant workers on grounds of race. The investigation points to the importance of ensuring that all recruitment agency staff are aware of their responsibilities under anti-discrimination legislation.

The Commission provides equality training for employers and recruitment agencies. Following this investigation the Commission will develop further training for the recruitment sector in partnership with the Recruitment Employment Confederation [REC]. Further outreach to non REC members will also take place.

The Commission will also work with the recruitment sector and other relevant organisations to develop a specific guidance document on the recruitment and employment of migrant workers for the recruitment sector.

- Recruitment agencies should take steps to ensure that the process of registering for work is not inaccessible for any migrant worker, and facilitate the work finding process for migrant workers who may have difficulty communicating in and reading English.

The registration process should not be inaccessible for some migrant workers. The Commission is concerned that the refusal of some agencies to make provision for migrant workers with limited English in the registration process is unreasonable and potentially discriminatory. There is evidence that this is happening even when the work may require basic English skills only.

The recruitment sector assesses the English language abilities of migrant work seekers and such assessments will provide an indication of the level of support a worker will require. Registration documentation should be translated where necessary and other reasonable steps taken to increase understanding.

It is evident that the good practices of some recruitment agencies, such as employing staff to act as interpreters, enable migrant workers to find work through the recruitment sector where they have been unable to find work in other ways. However, further measures could be put in place to assist migrant work seekers such as:

- supporting and or sign-posting ESOL classes
- placing downloadable registration documentation on the recruitment agency's web-site, or allowing migrant workers to take away copies from the recruitment office, prior to the registration interview.

The Commission acknowledges that there are benefits for migrant workers to learn or improve English language skills. Action should be taken to raise greater awareness of existing ESOL provision and of ways to access that provision. The recruitment sector, employers and the Department for Employment and Learning can all play a role in providing information on ESOL provision throughout Northern Ireland.

- Recruitment agencies must ensure that written information available in English, especially information they are legally required to provide is, where necessary, translated into a language that is understood by the work seeker and/or employee.

Recruitment agencies are legally required to agree with the work seeker the terms to apply between it and the work seeker, and provide all terms of that agreement in writing.¹

In addition, where the recruitment agency subsequently acts in the capacity of an employment business, these written terms must also include the main terms and conditions of service relating to all work undertaken.²

¹Regulation 14 of the of the Conduct of Employment Agencies and Employment Business Regulations (NI) 2005

²Regulation 15 of the of the Conduct of Employment Agencies and Employment Business Regulations (NI) 2005

The Commission is of the view that, to satisfy the legislative requirement of “agreement”, recruitment agencies must take necessary steps to ensure that contracts are clearly understood by employees whose first language is not English. There is evidence that migrant workers sign documents they do not fully understand and that this has led to confusion and difficulties. Department for Employment and Learning guidance states that employees should “not be expected to sign a contract in a language that [they] do not understand”.³

The Commission recommends the development of a model contract for use by all recruitment agencies. At present members of the REC have access to model contracts and other documents. The REC should explore the option of providing translated formats of these and other model documents.

Further explanatory information of terms and conditions would be an invaluable tool for any agency worker, but for migrant workers such explanation may be essential for understanding. In particular, annual leave entitlement should be fully explained, with practical examples illustrating the rules that apply and how holiday entitlement is calculated. This information should be provided in translated formats.

- It should be a Gangmasters Licensing Authority [GLA] standard that gangmasters/recruitment agencies must translate those documents which they are legally required to provide into a language understood by the worker.

At present it is a GLA licensing standard for gangmasters/recruitment agencies to agree contractual information with the work seeker. The Commission recommends that this licensing standard should also stipulate that gangmasters/recruitment agencies must provide this documentation in a language that the work seeker understands.

- Recruitment agencies should provide all workers with a comprehensive list of the documents they are entitled to receive on finding or leaving work through the recruitment sector, where necessary this should be translated.

Apart from the contractual documentation that must be provided by law, recruitment agencies and end-users will have a large amount of additional written documentation, including policies and procedures. As a matter of good practice

³Your Rights in Northern Ireland [page 30] Department of Employment and Learning

recruitment agencies should not presume that agency workers will understand such documentation if it is only provided in English. Migrant workers may be disadvantaged when it comes to understanding documents, particularly the more important ones.

It is important that all agency workers receive all documents to which they are entitled. Recruitment agencies should ensure that the workers are provided with a checklist of all these documents and that they receive all of these documents.

- Recruitment agencies should ensure that all agency workers, particularly those with limited English, are properly inducted and fully aware of all the agency's practices and procedures.

A lack of understanding may be a contributing factor to some of the problems reported by participants relating to issues like remuneration and holiday entitlement and pay. Good induction could reduce such problems, and also ensure that their contractual and other job-related documentation is understood.

It is particularly important that the recruitment agency's own policies and procedures can be easily understood by migrant workers. The Department for Employment and Learning has a key role in promoting good practice and should provide access on their website to model policies, such as Grievance and Discipline, in a number of different languages. The Commission has developed Equal Opportunity and Harassment Policies and can provide these in various languages on request.

- Recruitment agencies must not impose, or allow end-user employers to impose, unnecessary restrictions on agency workers using their native language, except where the use of English is genuinely necessary to carry out work.

One area of concern for the Commission was the allegation by participants that they had been instructed not to speak in languages other than English in the workplace. Whilst it may be justifiable to require workers to speak in English in some circumstances when working, for example in areas of customer service, it is likely to amount to unlawful race discrimination to forbid workers from countries where English is not the first or main language from having casual conversations with each other in their native language.

- Recruitment agencies should be satisfied that a high standard of English is a justifiable job criterion, and is not used to exclude foreign nationals from jobs for which they are suitably skilled.

There is evidence that the recruitment sector mainly places migrant workers into low paid and low skilled work and it is uncommon for migrant workers to be placed in a permanent skilled or professional position.

The recruitment sector has a role to play in encouraging clients to ensure that the skills levels forming part of the job criteria can be objectively justified.

In addition, recruitment agencies should ensure that they genuinely attempt to explore with foreign nationals registering with them all types of work that the person is interested in finding, including the possibility of higher skilled/professional work, and subsequently actively seek positions in all these areas.

- The Department for Employment and Learning should make existing mechanisms for checking foreign qualification equivalency more accessible.

The main route to identifying qualification equivalences at present is through The National Recognition Information Centre for the United Kingdom [UK NARIC]. This is the national agency providing the only official source of comparison information and advice on international education and training systems and overseas skills and qualifications. There is a cost involved to access this information and an additional charge for translation services.

The Commission would encourage improved access to the NARIC database at a community level. The Department for Employment and Learning has access to NARIC and will consider how it can further facilitate migrants who wish to check their qualifications with the UK NARIC International Comparisons Databases.

In addition, recruitment agencies that do not already provide access to the NARIC database should provide information about how to access this service in other ways.

- The recruitment sector should not specify qualifications that are only issued in the UK and Ireland, and should allow for the fact that foreign nationals will have equivalent qualifications gained in their home countries.

There may be an unwillingness to accept foreign qualifications amongst employers who set job criteria specific to UK qualifications. The recruitment sector has a role in encouraging clients to be inclusive of qualifications gained overseas.

- We encourage more effective dissemination of information about employment rights and awareness raising amongst migrant workers, either on arrival in Northern Ireland or, ideally, before leaving their own country. Statutory agencies should work with community organisations to outreach to local migrant communities by forming drop-in advice centres and to co-ordinate the dissemination of information.

There is evidence that migrant workers experience problems in terms of employment rights. Reasons include language barriers, a lack of knowledge of rights, fear of losing their job, cultural background and a lack of trust in authority. Information may be more effectively provided through:

- Drop-in advice centres
- Promotion and education
- Recruitment agency websites

Public bodies enforcing the legislative protections should be proactive in raising awareness amongst migrant workers of these protections and their role. Participants in this investigation were not always aware of the role of these bodies.

When migrant workers do assert their rights it is often with the help of migrant community organisations and support groups. Other organisations should tap into the services provided by these support groups and their ability to disseminate information to large groups of people.

Information could be provided on an individual basis from a range of relevant bodies setting up drop-in advice centres to operate in partnership with existing community based organisations and support groups. The Commission undertakes a programme of events in conjunction with partners aimed at raising awareness of anti discrimination legislation. This format can be used to promote and inform about migrant worker rights.

Despite the availability of a wide range of written information in translated formats, awareness of this information amongst migrant communities appears to be poor. Greater co-ordination in the development and dissemination of this information between the various organisations is recommended.

The Commission would encourage better use of the recruitment sector to display and disseminate written advice and information. The Commission would also encourage clear links on individual recruitment agency websites to other organisations who can provide advice and to the information available. All agency workers would benefit from the promotion of this information.

- Recruitment agencies that continue to work in collaboration with overseas agencies should satisfy themselves that such agencies are reputable. In addition, the Gangmasters Licensing Authority should continue to develop relationships outside the UK, and publicise prosecutions taken.

Many of the more questionable practices highlighted by this investigation relate to the activities of recruitment agencies based outside the UK. Such agencies can legitimately charge fees which would not be permissible in the UK, but other practices may be illegal.

Where these recruitment agencies are acting as gangmasters the GLA can act to prosecute rogue agencies.

The GLA has worked to establish relationships with Eastern European countries such as Poland, Romania and Bulgaria in an attempt to discourage bad practice. This approach has proved to be successful and should be encouraged.

The Commission would encourage information about rights and potential jobs being provided to migrants before they leave their own country. Recruitment agencies in Northern Ireland should ensure that they only work with reputable foreign agencies. Local recruitment agencies should ensure that correct information about available work is provided to work seekers before they leave their own country. Larger recruitment agencies may be able to do this when travelling overseas to conduct recruitment interviews and skills tests. In doing so, they will also ensure that only those who meet the job criteria will travel to Northern Ireland.

- Opt-outs from the working time legislation should not be routinely included in the contract of employment.

A recurring issue has been a claim that migrant workers are often expected to work longer hours than indigenous staff. Whilst the Working Time Regulations apply, participants in the investigation regularly reported feeling compelled to work long hours, and to opt-out of the legislative protection on working time. We also noted that the employment contracts of those employed by recruitment businesses routinely included an opt-out clause, giving the impression that opting out was a condition to being offered work.

Whilst recruitment businesses may advise work seekers that they will only be able to work 48 hours per week if they do not opt-out of this protection, this must not be done in a way that suggests an obligation to do so. Opt-outs must be genuinely agreed and must have relevance to the particular demands of the job in question.

If a worker does wish to waive this protection, this should be recorded on a separate form, and the agency must ensure that the worker is clearly advised of his/her right to change this decision.

This issue is one which the Department for Employment and Learning is aware of and we would encourage that action is taken as soon as possible.

Finally, apart from welcoming the broad purpose of the EU Temporary Agency Workers Directive, we have not included this matter in our recommendations at this time. Consultation has yet to be carried out in respect of the legislation that will be introduced in Northern Ireland to give effect to the Directive and the Commission will be responding to this consultation. The Commission, in particular, will wish to be satisfied that if the NI legislation replicates the GB provisions, where a 12 week qualifying period applies, any such qualification requirement is carefully drafted to avoid abuses of the 12 week threshold.

Taking these issues forward.

Following the publication of this report, the Commission will take action to address matters highlighted by the investigation, and to ensure that the recommendations are implemented. We shall:

- collaborate with relevant organisations to promote awareness amongst migrant communities of their rights under race relations and employment legislation, and the law regulating the recruitment sector in Northern Ireland
- develop, in consultation with the recruitment sector, guidance on the recruitment and employment of migrant workers by recruitment agencies
- develop and deliver training for the recruitment sector.

We intend to fully utilise our full range of investigative powers to promote equality of opportunity. At the appropriate time we shall report on the extent to which our recommendations have been implemented, and determine whether further action needs to be taken by the Commission.

Acknowledgements

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Ballymena Inter Ethnic Forum
Craigavon Intercultural Programme
Fermanagh International Communities Group
Minority Ethnic Employment Support Programme - GEMS NI
Newry Ethnic Minority Support Project
Omagh Ethnic Community Support Group
Rural Community Network, Co. Down
SEEDS. Londonderry
South Tyrone Empowerment Programme [STEP]

Further information and advice

For further information and advice on equality issues or if you would like to find out more about the Equality Commission and its work, contact us at:



Equality Commission for NI
Equality House
7-9 Shaftesbury Square
Belfast BT2 7DP



Telephone: 028 90 890 890 (Enquiry Line)



Fax: 028 90 315 993



Textphone: 028 90 500 589



Email: information@equalityni.org



Website: www.equalityni.org

You can also use Typetalk to contact us.

This summary report is on the Commission's website and is available in English, Lithuanian, Polish, Portuguese and Slovakian.

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INVESTOR IN PEOPLE