

## THE PATH TO CITIZENSHIP: NEXT STEPS IN REFORMING THE IMMIGRATION SYSTEM CONSULTATION QUESTIONS

FEBRUARY 2008

Completed consultation proformas should be sent no later than 14th May to the following address.

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|--|---|
| <b>DATE</b>  | 12 May 2008   |
| <b>NAME</b>  | Metropolitan Support Trust  |
| <b>ORGANISATION</b>  | Metropolitan Support Trust  |
| <b>CONTACT DETAILS</b><br>(EG POSTAL ADDRESS/<br>E-MAIL/TEL. NUMBER) | Dr Charlotte Keeble (Research and Consultancy Manager), Metropolitan Support Trust, MHT House, Crescent Lane, Clapham, SW4 9RS.<br>Tel: 02075012214 |

### CHAPTER 3: THREE ROUTES TO CITIZENSHIP AND THREE STAGES IN THE JOURNEY

1. ARE ALL PARTS OF THE SYSTEM SET OUT IN CHAPTER 3 (I.E. THE THREE ROUTES TO CITIZENSHIP AND THE THREE STAGES IN THE JOURNEY) CLEAR AND EASY TO UNDERSTAND?

- Yes  
 No  
 Unsure

If you have answered no, please state what part of the system you think is not clear and easy to understand. (free response)

The information presented in Chapter 3 with regards to the three stages in the journey: temporary residence, probationary citizenship and British citizenship/permanent residence are clear however Metropolitan Support Trust

(MST) identifies that it is sometimes difficult to categorise highly skilled and skilled workers. For example, would a chef be classified as a skilled or low skilled worker? It is felt that too much emphasis is placed on the 'professions' in Tiers 1 and 2. Recent research commissioned by MST identified that in terms of refugees and asylum seekers, their qualifications and experience may not easily fit in to the descriptions identified for Tiers 1 and 2 and whilst individuals are highly skilled in their own country, their experience has left them ill-equipped for working in the UK, as they lack, for example, required skills in information technology. (IPPR, From Refugee to Citizen: 'Standing on my own two feet' A research report on integration, 'Britishness' and citizenship, 2007)

## 2. DO YOU THINK THE CONCEPT OF 'PROBATIONARY CITIZENSHIP' IS A GOOD IDEA?

*Probationary citizenship is a new stage which is time-limited to encourage migrants to complete the journey to citizenship and integrate fully into British society. It is intended to provide a stepping stone between temporary residence and British citizenship/permanent residence. During their time as probationary citizens migrants will demonstrate whether they have earned their right to British citizenship or permanent residence.*

- Yes  
 No  
 Unsure

**Please list any reasons for your response below. (free response)**

Further clarity is needed in what is meant by migrants earning 'their right' to British citizenship or permanent residence. The guidance suggests that there is an intention to strengthen English language requirements and individuals will need to demonstrate progress in their grasp of English language. This could potentially discriminate against certain groups. Large numbers of refugees arrive in the UK speaking little or no English. A lack of basic literacy skills, in their own language means that some refugees do not have the necessary requirements to undertake basic ESOL classes (Entry A1, Level 1). ESOL classes do not take this in to account and are not necessarily tailored to their needs. Additionally, some women's English language development may be impeded as they are unable to attend ESOL classes due to childcare commitments, breaks in their study due to pregnancy and childbirth and fears over their lack of personal safety travelling distances to classes on public transport. These factors must be taken into account if English language progression is to be used as a gauge to determine whether a person can move from being a 'probationary citizen' to completing their journey to citizenship.

In some areas, long waiting lists for ESOL classes impede learning, for example a college in north London has a waiting list of 500 people.

There are also barriers for individuals who are prevented from learning English language due to disability, mental health or their age (the elderly).

## 3. MIGRANTS OF CERTAIN NATIONALITIES MAY CHOOSE NOT TO BECOME BRITISH CITIZENS BECAUSE OF RESTRICTIONS ON HOLDING MORE THAN ONE NATIONALITY IN THE LAW OF THEIR COUNTRY OF ORIGIN. DO YOU THINK THAT A PERMANENT RESIDENCE CATEGORY SHOULD BE PROVIDED FOR PERSONS IN THIS SITUATION?

*We recognise that some people will feel unable to apply for British citizenship - because of restrictions on holding more than one nationality in the law of their country of origin - and we have taken this into account in the proposed architecture. We intend to provide a clear route for migrants to become permanent residents, as an alternative route to British citizenship, but all migrants will need to spend longer as probationary citizens if they choose this route. A shorter progression time to British citizenship from probationary citizenship is intended to encourage migrants to choose British citizenship above permanent residence.*

- Yes  
 No  
 Unsure

**Please list any reasons for your response below. (free response)**

It is unclear what would happen if individuals who initially choose to be permanent residents and then change their minds and opt for British citizenship? Will their time as a probationary citizen be counted regardless of their initial intentions?

Further, MST believes individuals recognised as refugees should be granted indefinite leave to remain (ILR) upon

being granted refugee status.

#### 4. DO YOU THINK THE 'UK ANCESTRY' ROUTE SHOULD BE ABOLISHED?

*Under the current UK ancestry provisions, a Commonwealth citizen, aged 17 or over, who is able to show that one of his grandparents was born in the UK, and who intends to take or seek employment here, may be granted an entry clearance on the basis of his UK ancestry.*

- Yes
- No
- Unsure

**Please list any reasons for your response below. (free response)**

#### 5. DO YOU THINK THE 'RETIRED PERSONS OF INDEPENDENT MEANS' ROUTE SHOULD BE ABOLISHED?

*Under the existing 'retired persons of independent means' provisions, a person may qualify for an entry clearance if they are aged 60 or over, have an income of at least £25,000 a year, have a close connection with the UK, and intend to make the UK their home.*

- Yes
- No
- Unsure

**Please list any reasons for your response below. (free response)**

Further clarity is needed as to what is meant by having a 'close connection with the UK.' There is also an issue regarding free access to healthcare on arrival, since it could be argued that this group may potentially draw on healthcare resources the most?

## CHAPTER 4: EARNING THE RIGHT TO STAY

### 1. ARE THE PROPOSED MINIMUM TIME PERIODS FOR A MIGRANT TO COMPLETE THE JOURNEY TO BRITISH CITIZENSHIP SUITABLE?

#### A. 6 YEARS FOR ECONOMIC MIGRANTS (UNDER TIERS 1 AND 2 OF THE PBS) AND THEIR DEPENDANTS

*We propose that persons on the 'economic migrant' route should be able to qualify for **citizenship** after a minimum of 6 years. This period is made up of a 5 years as a temporary resident and a minimum of 1 year as a probationary citizen.*

- Yes
- No: the time period should be increased
- No: the time period should be decreased
- Unsure

#### B. 3 YEARS FOR FAMILY MEMBERS OF BRITISH CITIZENS/PERMANENT RESIDENTS

*We propose that family members of British citizens/permanent residents should be able to qualify for **citizenship** after a minimum of 3 years. This period is made up of a 2 years as a temporary resident and a minimum of 1 year as a probationary citizen.*

- Yes
- No: the time period should be increased
- No: the time period should be decreased
- Unsure

## C. 6 YEARS FOR MIGRANTS GIVEN PROTECTION (THOSE GRANTED REFUGEE STATUS AND HUMANITARIAN PROTECTION) AND THEIR DEPENDANTS

*We propose that persons on the 'protection' route should be able to qualify for **citizenship** after a minimum of 6 years. This period is made up of 5 years as a temporary resident and a minimum of 1 year as a probationary citizen.*

- Yes
- No: the time period should be increased
- No: the time period should be decreased
- Unsure

**Please list any reasons for your response below. (free response)**

Q1B. It is felt that three years is too long with regards to family members and should be assessed on a case-by-case basis.

The guidance is unclear/does not stipulate the differences in assessment criteria between probationary citizenship and British citizenship/permanent residence? If these stages are determined by a person's literacy and ability to speak English, what level ESOL are people expected to have? Will people be required to take a Citizenship test only if they decide to become British citizens? or are they required to take the test if they opt to become permanent residents?

Q1C. The requirements for refugees to progress to citizenship should be made clearer. The different leave statuses awarded to those given protection in the UK, but not recognised as refugees is complex and the route to citizenship/ options for permanent settlement should be clearly outlined for all groups.

Until August 2005, individuals recognised as refugees were granted indefinite leave to remain in the UK. Refugee status is now granted for an initial period of five years, subject to active review. After which time, refugees may apply for ILR upon successfully passing a settlement test, which requires the same knowledge of life in the UK and language ability as citizenship. They will then have to wait a further year before being able to apply for citizenship, which requires an additional settlement test. The process and timescales involved in applying for citizenship should be made clearer to refugees from the outset. The progression to citizenship for those granted ILR prior to August 2005 who choose to take this route should be made clearer.

Metropolitan Support Trust believes that refugees should have equal and early access to citizenship processes. Unlike other new citizens who may have come to the UK to further their economic prospects, refugees spend considerable time periods in the UK without the right to work. Most research on refugee employment highlights high levels of unemployment among many refugee groups and discrimination in job seeking. Many are on low incomes, supporting families and do not have the financial means to afford the cost of applying for citizenship, which costs around £655 for a single applicant and £735 for a joint application (of which only £80 is refunded if the application is withdrawn or is not successful). It is important that refugees are not discriminated against in terms of their economic ability to apply for citizenship. There is a need to provide a 'reduced rate' for refugees who wish to apply for citizenship.

Further, the minimum time periods cited are applicable only to those who show proof of active citizenship. This should be clearly highlighted. MST's concerns regarding this requirement are cited below.

## 2. ARE THE PROPOSED MINIMUM TIME PERIODS FOR A MIGRANT TO COMPLETE THE JOURNEY TO PERMANENT RESIDENCE SUITABLE?

### A. 8 YEARS FOR ECONOMIC MIGRANTS (TIERS 1 AND 2 OF THE PBS) AND THEIR DEPENDANTS

*We propose that persons on the 'economic migrant' route should be able to qualify for **permanent residence** after a minimum of 8 years. This period is made up of 5 years as a temporary resident and a minimum of 3 years as a probationary citizen.*

- Yes
- No: the time periods should be increased
- No: the time periods should be decreased
- Unsure

## B. 5 YEARS FOR FAMILY MEMBERS OF BRITISH CITIZENS AND PERMANENT RESIDENTS

We propose that family members of British citizens and **permanent residents** should be able to qualify for permanent residence after a minimum of 5 years. This period is made up of 2 years as a temporary resident and a minimum of 3 years as a probationary citizen.

- Yes
- No: the time periods should be increased
- No: the time periods should be decreased
- Unsure

## C. 8 YEARS FOR MIGRANTS GIVEN PROTECTION (THOSE GRANTED REFUGEE STATUS OR HUMANITARIAN PROTECTION) AND THEIR DEPENDANTS

We propose that persons on the 'protection' route should be able to qualify for **permanent residence** after a minimum of 8 years. This period is made up of 5 years as a temporary resident and a minimum of 3 years as a probationary citizen.

- Yes
- No: the time periods should be increased
- No: the time periods should be decreased
- Unsure

**Please list any reasons for your response below. (free response)**

Q2.A. The extended two year period, if a migrant qualifies for permanent residence rather than British citizenship may be deemed as unfair, particularly if an individual is prevented from applying for British citizenship because of restrictions on holding more than one nationality in the law of their country of origin.

Q2.C. It is felt that migrants given protection should be granted ILR upon being recognised as refugees. For refugees, who fled to the the UK due to the inability to remain in their country of origin, temporary residency is felt to have a detrimental effect on being an active citizen in terms of the negative impact on employment prospects, inability to plan ahead, leading to stress and the resultant difficulties in integrating.

## 3. SHOULD PARTNERS OF BRITISH CITIZENS OR PERMANENT RESIDENTS BE REQUIRED TO DEMONSTRATE THAT THEY ARE IN AN ONGOING RELATIONSHIP WITH THE CITIZEN/PERMANENT RESIDENT BEFORE PROGRESSING:

### A. FROM THE PROBATIONARY CITIZENSHIP STAGE TO BRITISH CITIZENSHIP?

- Yes
- No
- Unsure

### B. FROM THE PROBATIONARY CITIZENSHIP STAGE TO PERMANENT RESIDENCE?

- Yes
- No
- Unsure

**Please list any reasons for your response below. (free response)**

## 4. SHOULD GATEWAY REFUGEES CONTINUE TO BE GRANTED PERMANENT RESIDENCE ON ARRIVAL IN THE UK?

The Gateway Protection Programme is the UK's international commitment to offer permanent protection for refugees in vulnerable situations where resettlement is the only solution. The Gateway Programme is run in conjunction with the UNHCR. At present, Gateway refugees are granted settlement on arrival in the UK with no requirement for an active review.

- Yes  
 No  
 Unsure

Please list any reasons for your response below. (free response)

These individuals have already made their case to a respected authority and are already extremely vulnerable, being granted refugee status prior to arrival, aids their integration and helps them to settle.

## 5. ACTIVE CITIZENSHIP

*We propose that probationary citizens who have demonstrated 'active citizenship' (e.g. volunteering with a recognised charity) should be able to apply for citizenship or permanent residency sooner than those who do not.*

*Migrants who **have demonstrated active citizenship** would be able to apply for **citizenship** after a minimum of **1 year** and **permanent residence** after a minimum of **3 years** as probationary citizens.*

*Migrants who have **not** demonstrated active citizenship would be able to apply for **citizenship** after a minimum of **3 years** and **permanent residence** after a minimum of **5 years** as probationary citizens.*

### A. SHOULD 'ACTIVE CITIZENSHIP' BE A MEANS BY WHICH PROBATIONARY CITIZENS CAN SPEED UP THEIR JOURNEY BRITISH CITIZENSHIP OR PERMANENT RESIDENCE?

- Yes  
 No  
 Unsure

*We are also seeking views on whether all migrants should be **required** to demonstrate a minimum level of community involvement.*

### B. SHOULD 'ACTIVE CITIZENSHIP' BE A MANDATORY REQUIREMENT FOR ALL PROBATIONARY CITIZENS TO QUALIFY FOR BRITISH CITIZENSHIP OR PERMANENT RESIDENCE?

- Yes  
 No  
 Unsure

Please list any reasons for your response below. (free response)

MST endorses volunteering and the positive contributions it makes. Volunteering by refugees and asylum seekers is a very positive experience. Whilst mainstream volunteering promotes integration, many refugees and asylum seekers are unaware of the availability or value of volunteering opportunities. Many mainstream organisations are not aware of the potential of refugees and asylum seekers as volunteers and do not know how to recruit them. Criminal Records Bureau (CRB) checks present barriers to volunteer recruitment due to lack of identification papers or a permanent address. This is particularly significant for asylum seekers who are sometimes prevented from volunteering activities as they are unable to get a CRB check.

MST is concerned about the impact of the active citizenship requirement particularly for those who may have difficulties in becoming volunteers, owing to other commitments (childcare, paid employment, etc.) or health issues. Whilst it is felt that promoting volunteering is a positive development and that there are benefits to be gained from volunteering both for the individual, employer and community involved, it is felt that volunteering should be a choice, rather than mandatory.

It is unclear how volunteering will be measured? It is essential that clear guidelines and standards are set to assess volunteering activity. The guidance does not clarify how volunteering will be assessed. It should also acknowledge volunteering activity that takes place sometimes quite discretely in community settings. Many people work in their own communities, (as interpreters, for example) however their work is unrecognised as they do not work for a registered charity etc.

If volunteering is to be taken seriously, then there is a need for the Government to advertise its potential benefits particularly in the case of refugees and asylum seekers. Asylum seekers may face discrimination as volunteer managers may pay less attention to the quality of experience they offer asylum seekers because they see them as

short term volunteers or because they do not have permission to work.

5B Active citizenship should not be a mandatory requirement as individuals should have the right to choose. For some individuals it may not be possible or practical due to family commitments or mental health.

## 6. SHOULD THE FOLLOWING ACTIVITIES BE VIEWED AS DEMONSTRATIONS OF 'ACTIVE CITIZENSHIP'?

### A. VOLUNTEERING WITH A RECOGNISED ORGANISATION OR CHARITY

- Yes
- No
- Unsure

### B. EMPLOYER SUPPORTED VOLUNTEERING

- Yes
- No
- Unsure

### C. VOLUNTEERING WITH A RECOGNISED ORGANISATION TO SUPPORT THE UK'S INTERNATIONAL DEVELOPMENT OBJECTIVES, INCLUDING SHORT PERIODS OF TIME OVERSEAS

- Yes
- No
- Unsure

### D. RUNNING OR HELPING TO RUN A PLAYGROUP WHICH ENCOURAGES THE DIFFERENT COMMUNITIES TO INTERACT

- Yes
- No
- Unsure

### E. FUND-RAISING ACTIVITIES FOR CHARITIES OR SCHOOLS

- Yes
- No
- Unsure

### F. SERVING ON COMMUNITY BODIES, FOR EXAMPLE AS A SCHOOL GOVERNOR

- Yes
- No
- Unsure

### G. RUNNING OR HELPING RUN A LOCAL SPORTING TEAM

- Yes
- No
- Unsure

**Please detail any other activities that you think should be viewed as demonstrations of active citizenship (free response).**

Other examples should be less onerous such as: caring for another person; working with religious organisations; working with in the community (such as running a women's group); or assisting neighbours.

## 7. DO YOU THINK THAT COMMITTING A CRIME WHICH ATTRACTS A CUSTODIAL SENTENCE SHOULD

### SLOW DOWN OR STOP A MIGRANT'S PROGRESSION TO PERMANENT RESIDENCE?

- Slow down
- Stop
- Neither
- Unsure

### 8. DO YOU THINK THAT COMMITTING AN OFFENCE WHICH DOES NOT ATTRACT A CUSTODIAL SENTENCE SHOULD SLOW DOWN OR STOP A MIGRANT'S PROGRESSION TO PERMANENT RESIDENCE?

- Slow down
- Stop
- Neither
- Unsure

Please list any reasons for your response below. (free response)

Concern was raised about refugees residing in the UK who may be unaware of UK legislation, and therefore inadvertently commit a minor crime.

Clarity is needed with regards to the Rehabilitation of Offenders Act, in particular 'spent convictions.' Does the Act apply to asylum seekers? If so, does the rehabilitation period apply if the crime was committed prior to them entering the UK?

If the offence includes traffic offences or offences related to minor transgressions under the Public Order Act then the offence should not affect the progression.

### 9. DO YOU THINK PROGRESSION SHOULD BE STOPPED OR DELAYED FOR THOSE WHOSE CHILDREN COMMIT CRIMINAL OFFENCES?

- Slow down
- Stop
- Neither
- Unsure

Please list any reasons for your response below. (free response)

The response should be decided on a case by case basis and depend on the crime committed. Does it relate to dependant children under 18?

## CHAPTER 5: THE IMPACT OF MIGRATION AND ACCESS TO BENEFITS AND SERVICES

### 1. SHOULD PROBATIONARY CITIZENS WHO HAVE ENTERED THE UK THROUGH THE ECONOMIC OR FAMILY ROUTES HAVE ACCESS TO BENEFITS *IN ADDITION* TO THOSE BASED SOLELY ON CONTRIBUTIONS MADE THROUGH THE NATIONAL INSURANCE SCHEME?

*We are proposing that probationary citizens who have entered the UK through the economic or family routes should continue to only have access to benefits based on the contributions they have made through the National Insurance scheme, providing that the minimum level of contributions have been made.*

- Yes
- No
- Unsure

Please list any reasons for your response below. (free response)

## 2. FURTHER AND HIGHER EDUCATION

*We are proposing that probationary citizens should have access to ESOL further education courses at the 'home rate', instead of at the higher 'overseas rate' and that access to higher education at the 'home rate' should only be available at British citizenship/permanent residence. ('Home rate' fees are those which British citizens pay for further education; non-citizens pay a higher premium for access to educational institutions: the 'overseas rate')*

### A. AT WHICH STAGE IN THE JOURNEY TO CITIZENSHIP DO YOU THINK FURTHER EDUCATION FOR THE SAME FEES AS BRITISH NATIONALS (RATHER THAN AT THE HIGHER 'OVERSEAS RATE') SHOULD BE AVAILABLE?

- Temporary residence
- Probationary citizenship
- British citizenship/permanent residence
- Unsure

### B. AT WHICH STAGE IN THE JOURNEY TO CITIZENSHIP DO YOU THINK HIGHER EDUCATION FOR THE SAME FEES AS BRITISH NATIONALS (RATHER THAN AT THE HIGHER 'OVERSEAS RATE') SHOULD BE AVAILABLE?

- Temporary residence
- Probationary citizenship
- British citizenship/permanent residence
- Unsure

## 3. SHOULD NON-EEA MIGRANTS ENTERING THROUGH THE ECONOMIC AND FAMILY ROUTES PAY AN ADDITIONAL CHARGE ON TOP OF EXISTING APPLICATION FEES IN ORDER TO CREATE A FUND WHICH WOULD BE USED TO ALLEVIATE SHORT-TERM PRESSURES ON LOCAL PUBLIC SERVICES CAUSED BY MIGRATION?

- Yes
- No
- Unsure

Please list any reasons for your response below. (free response)

It is felt that public services will benefit all migrants, and therefore to put the onus on non-EEA migrants to fund an additional fund for these services is discriminatory.

## CHAPTER 7: SIMPLIFYING THE SYSTEM AND REFORMING THE LAW

### 1. OVERALL, ARE THE SIMPLIFICATION PROPOSALS SET OUT IN CHAPTER 7 OF THE GREEN PAPER IN KEEPING WITH THE SIMPLIFICATION PRINCIPLES OUTLINED IN PARAGRAPH 223?

- Yes
- No
- Unsure

### ARE THERE ANY SIMPLIFICATION PROPOSALS THAT YOU FEEL ARE NOT IN KEEPING WITH THE SIMPLIFICATION PRINCIPLES IN PARAGRAPH 223?

- Yes
- No
- Unsure

Please state which proposals you feel are not in keeping with the simplification principles and why (free

response).

**2. DO YOU HAVE ANY FURTHER THOUGHTS OR COMMENTS ON THE SIMPLIFICATION PROPOSALS SET OUT?  
(free response)**

## ANNEX C: CONSULTATION ON IMPACTS OF GREEN PAPER PROPOSALS

**1. DO YOU THINK THAT THE SCOPE OF THE IDENTIFIED COSTS AND BENEFITS IN ANNEX C IS CORRECT?**

*In Annex C we discuss areas where the Green paper proposals may give rise to costs or benefits. We are seeking comments on whether the scope of identified costs and benefits seems broadly correct.*

- Yes
- No
- Unsure

**Please list any reasons for your response below. (free response)**

Increased funding needed to run ESOL classes. Demand currently exceeds supply in some areas.  
Additional costs regarding publicity and promotion in relation to the positive contribution that volunteering has.

## RESPONDENT INFORMATION

**HOW DID YOU FIND OUT ABOUT THE CONSULTATION?**

- a) from the Home Office
- b) on line
- c) through your organisation
- d) through friends
- e) through a consultation event
- f) through the media
- g) other (please specify)

**HOW ARE YOU REPLYING TO US?**

- a) by e-mail
- b) by post
- c) at a consultation event
- d) other (please specify)

**ARE YOU A:**

- a) British Citizen
- b) non-British Citizen permanently resident in the UK
- c) non-British Citizen temporarily resident in the UK
- d) other (please state)

This is an organisation wide response from the Metropolitan Support Trust/Refugee Support.

**PLEASE INDICATE THE REGION OF THE UK YOU ARE FROM, OR THE ORGANISATION WHICH YOU REPRESENT IS BASED:**

- a) England
- b) Scotland
- c) Wales
- D) Northern Ireland

**ARE YOU A: (PLEASE SELECT ALL THAT APPLY)**

- a) member of the general public
- b) voluntary/community organisation or charity
- c) an employment agency
- d) educational institution
- e) local government
- f) immigration advisor/Immigration Law Practitioner
- g) central government
- h) an employer/trade association
- i) other (please specify)

**ARE YOU A:**

- a) public sector body
- b) private sector body
- c) other (please specify)

Metropolitan Support Trust is part of Metropolitan Housing Partnership, a family of social businesses that support and complement each other's work. Refugee Support is one of the country's leading providers of housing and support for refugees and asylum seekers, and is the name of MST's refugee services.

**PLEASE TICK THE BOX THAT BEST DESCRIBES THE SECTOR YOUR ORGANISATION FALLS INTO (IF ANY)**

- a) administration, business and management services
- b) agricultural activities
- c) computer services
- d) construction and land services
- e) education and cultural activities
- f) entertainment and leisure services
- g) extraction industries
- h) financial services
- i) government
- j) private health and medical services
- k) NHS Trust
- l) hospitality, hotel and catering and other related services
- m) law related services
- n) manufacturing

- o) real estate and property services
- p) retail and related services
- q) security and protective services
- r) social care services
- s) sporting activities
- t) telecommunications
- u) transport
- v) utilities – gas, electricity and water
- w) other services