ILPA IMMIGRATION LAW PRACTITIONERS' ASSOCIATION
PRESIDENT: IAN MACDONALD QC

ILPA response to Ministry of Justice consultation on draft code of practice for adult conditional cautions

1. About ILPA

The Immigration Law Practitioners' Association (ILPA) is a professional membership association the majority of whose members are barristers, solicitors and advocates practising in all aspects of immigration, asylum and nationality law. Academics, non-governmental organisations and individuals with an interest in the law are also members. Established over 25 years ago, ILPA exists to promote and improve advice and representation in immigration, asylum and nationality law through an extensive programme of training and disseminating information and by providing evidence-based research and opinion. ILPA is represented on numerous Government, court, Ministry of Justice and other consultative and advisory groups.

ILPA's response is confined to the matter of foreign offender conditions. We consider that an attempt to divide our response between the questions set out in the consultation would make the information we provide less clear and thus less useful to the Ministry and therefore we have not done so.

We are grateful to the Detention Advisory Service for sight of their draft response to this consultation and acknowledge our debt to them.

2. Conditional cautions

For the assistance of readers who are familiar with immigration rather than criminal law, we have summarised the provisions on conditional cautions at the beginning of this response.

A conditional caution is "a caution which is given in respect of an offence committed by the offender and which has conditions attached to it with which the offender must comply."[1]

There are five requirements that must be met before a conditional caution may be given. These include that there is sufficient evidence to charge the offence, that the effect of the conditional caution is explained to the offender, and that the person given the caution is warned that failure to comply with any of the conditions may result in prosecution for the offence.

Foreign offender conditions were introduced by the Legal Aid, Sentencing and Punishment of Offenders Act 2012. They can be imposed upon offenders directions for whose removal from the United Kingdom have been, or may be, given under Schedule 2 to the Immigration

[1] Criminal Justice Act 2003, s 22 (2).

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Act 1971, section 10 of the Immigration and Asylum Act 1999 or against whom a deportation order under section 5 of the Immigration Act 1971 is in force.

They are imposed with the objects of bringing about the departure of the offender from the United Kingdom and/or ensuring that the offender does not return for a period of time.[2]

3. **Nature of the conditions**

The draft code of practice sets out the proposed conditions that could be imposed: reporting obligations; obtaining or assisting the authorities in obtaining travel documents and complying with instructions given by the Secretary of State or an immigration officer. These are immigration conditions.

4. **Persons with no leave whose departure there is power to enforce**

It is important not to make the assumption that persons with no leave whose departure there is power to enforce, which is the way those eligible for these cautions are described in the draft code of practice, are persons whose case has already been dealt with by the immigration authorities. While this will be true in some cases, those offered a conditional caution may first have come to the attention of the immigration authorities when arrested; there will not necessarily have been any consideration of whether they have a basis on which to stay in the UK and there will be no such consideration by the immigration authorities unless they make an application.

A person who entered the UK without coming to the attention of the authorities, or who remained in the UK beyond the duration of their visa (an overstayer) or who claimed asylum or another basis of stay but whose application and any appeals failed will be a person with "no leave to enter or remain in the UK and in respect of whom there is a power to enforce their departure from the UK"[3] but this is not the end of the story. The person may at any time claim asylum (including a fresh claim from persons whose previous claim was dismissed but who now has fresh evidence) or may assert that their removal from the UK would breach their human rights, for example under Article 8 of the European Convention on Human Rights, the right to private and family life.

Persons under immigration control will have a nationality other than British nationality. Those who do not have English as a mother tongue will, to a large extent, be identifiable by their national and ethnic origins. Provisions relating to cautions with foreign offender conditions by definition affect persons on the basis of these protected characteristics.

Race, ethnic or national origin, disability, age, gender, religion or belief and sexual orientation, all protected characteristics, are very frequently factors determining whether a person has an immigration/asylum case to make. It is the case that a proportion of those who have suffered persecution prior to coming to the UK or who have lived lives of great hardship in living underground or under immigration control in the UK, will have mental health problems. Thus these characteristics are likely to be material to the question of whether a person with no leave whose departure there is power to enforce needs to consider his/her immigration/asylum options to make an informed decision about a conditional caution. This merits consideration in a careful equality impact assessment.

[2] Criminal Justice Act 2003, s 22 (3E).
[3] Draft Code of Practice at page three.

5. Need for legal advice

Paragraph 3.6 of the draft code states:

> *…before administering a conditional caution the authorised person shall ensure that the offender has the opportunity to receive free and independent legal advice in relation to the offence.*

A footnote then sets out that an offender is not entitled to free and independent legal advice in relation to most non-asylum immigration matters such as their immigration status. This is wholly inadequate given the legal framework.

Without legal advice on immigration foreign nationals may agree to a caution without having understood its full consequences and therefore that injustice will be done or that they will subsequently change their minds and withdraw consent, with the resultant delay for any prosecution.

An offender requires free and independent legal advice on the impact on the conditional caution. This will involve giving immigration advice.

It is a criminal offence to give immigration advice in the course of a business, whether or not for profit unless one is a solicitor, barrister, or regulated by the Office of the Immigration Services Commissioner to do so.[4]

Given that those with "no leave to enter or remain in the UK and in respect of whom there is a power to enforce their departure" cannot work or claim benefits, the working assumption absent detailed accurate evidence having been gathered must be that 100% of such persons satisfy the means test for legal aid.

We draw attention to the removal of legal aid from immigration, as opposed to asylum cases, intended to take effect in April 2013. The changes will mean that those who face removal who are not making a claim for international protection, or have a national security or trafficking case, will not be able to obtain legal advice and representation free of charge and thus, for those unable to pay, at all.

Immigration advice is likely to be necessary for the person to understand the effects of the caution, and thus for the condition precedent to the giving of a caution set out in section 23 (4) of the 2003 Act, "that the authorised person explains the effect of the conditional caution to the offender" to be met. Similarly with the requirement in paragraph 3.7 of the draft code to explain the implications of accepting the conditional caution. Thus we identify a real risk that while these cautions are in theory available to be offered, in practice they will not be.

Until it is known whether a person is taking steps to regularise their stay such that there is no current power to enforce their departure then foreign offender conditions cannot satisfy the test of being appropriate, proportionate or achievable, set out in paragraph 2.22 of the Code.

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[4] Immigration and Asylum Act 1999 s 84.

We recommend that the Lord Chancellor use his powers under section 9(2(a) of the Legal Aid Sentencing and Punishment of Offenders Act 2012 to bring back into scope legal aid for foreign nationals whom the State wishes to offer a conditional caution. This is necessary to ensure that the condition set out in section 23 (4) of the Legal Aid Sentencing and Punishment of Offenders Act 2012 can be met.[5]

For those who have a case that remains within the scope of legal aid, including those seeking to determine whether or not to make an application for international protection, the initial advice when they are held in the police station is via the Police Station Advice Line. This is advice over the telephone, with the extra complications that language barriers and the use of an interpreter introduce. There are also concerns that insufficient use is made of interpreters.[6] Further, face to face advice is likely to be necessary to consider the documentation that a person possesses. Some people will have no clear idea of their immigration status or of what the documents in their possession are or mean. Matters such as mental health and literacy may be relevant to the extent to which a person understands their status. The difficulty of finding legal advice on immigration is recognised.[7]

All of the above could, in addition to resulting in the caution's not being able lawfully to be administered at all, result in delays in administering the caution. Equally real is the concern that under threat of prosecution and without immigration advice persons with asylum or human rights claims may agree to conditions that will result in their removal and in practice be unable to withdraw their decision (see further below).

We consider it important to make clear that a foreign national whether or not s/he can be removed from the UK (including persons without lawful immigration status who cannot be removed), for example a person who currently has no leave to remain in the UK but who cannot be documented for removal), can nonetheless be considered for a conditional caution on all the other grounds. Not so to consider them could give rise to differential treatment on the basis of a protected characteristic.

Similarly, just because foreign offender conditions are being imposed should not preclude the imposition of rehabilitative, reparative or punitive conditions. To deny access to rehabilitative and indeed in many cases reparative conditions to foreign national offender could give rise to differential treatment on the basis of a protected characteristic.

6. Oversight by the Crown Prosecution Service

We consider that there should be Crown Prosecution Service oversight of all cautions with foreign offender conditions given the complexities identified above and throughout this response.

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[5] See further below.

[6] See Her Majesty's Inspectorate of Prisons and Her Majesty's Inspectorate of Constabulary *Report on an unannounced inspection visit to police custody suites in the Metropolitan Police Service Borough Operational Command Unit of Redbridge* (2012), available at http://www.justice.gov.uk/downloads/publications/inspectorate-reports/hmipris/police-cell-inspections/redbridge-2012.pdf

[7] To take an example relevant to this context see the views of prison staff as recorded by the Detention Advisory Service *Foreign national prisoners – All you need to know: 2011 annual conference report, Detention advisory Service 2012* – available at http://www.detentionadvice.org.uk/uploads/1/0/4/1/10410823/dasconfreport2011.pdf

During Commons Committee Stage of the Legal Aid, Sentencing and Punishment of Offenders Bill, the government clearly recognised that the on-going involvement of the Crown Prosecution Service "is vital for making appropriate decisions on the suitability of offering conditional cautions to foreign offenders."[8] Express inclusion of this requirement in the code would therefore appear appropriate.

7. Comments on paragraphs of the code

Paragraph 2.8

We are concerned that an express prohibition should be inserted to clarify that the power to take into account any wider neighbourhood or community concerns cannot be used to take into account local sentiment toward foreign nationals. To take this into account would give rise to a risk of taking into account hostility toward persons of particular nationalities, races, ethnic or national origins whether this militated for or against the giving of a conditional caution. While this may seem obvious, given that taking race or nationality into account would constitute unlawful discrimination, we consider that the risks of its happening are high and that is why we advocate express prohibition. It is particularly likely that it will be confused with the power as set out in paragraph 2.25 to use conditions to make an offender stay away from a particular area.

Paragraph 2.10

It is suggested that these cautions may be suitable for more serious offences because the person will not remain in the UK. This seems to take a rather cavalier attitude to those in the country to which the person is sent. We recall that provisions exist to permit the transfer of prisoners.

Paragraph 2.19

We do not understand why an offender would be required regularly to report to a removal centre. Removal centres do not function as reporting centres and as far as we are aware there is no intention to use them for this. Indeed, they would be ill-suited being general yin remote locations. We suggest that what is meant is "reporting centre."

A person cannot be required to "obtain" a valid national travel document as this is not within their power. The State of origin might, however unreasonably, refuse the document. A person can be required to attempt to obtain just as they can be required to cooperate in attempts to obtain, but no more than that. See also comments on 2.34 below.

The condition of "comply with any lawful instruction given by the Secretary of State or an immigration officer" is too broadly drafted. It should be expressly limited to instructions material to fulfilment of the conditions of the caution and the instruction should be specified in as much detail as possible as a condition of the caution. The particular instruction should be specified as a condition of the caution. While an instruction that is not reasonable in all the circumstances would not be lawful it would be sensible to avoid a swathe of these cases ending up in the administrative court by more careful drafting.

[8] HC Public Bill Committee, 13 October 2011 Afternoon, clause 108, col 790 per Crispin Blunt MP Parliamentary Under-Secretary of State for Justice, available at http://www.publications.parliament.uk/pa/cm201011/cmpublic/legalaid/111013/pm/111013s01.htm

Paragraph 2.21

We agree that the use of foreign offender conditions should be prohibited in the circumstances described however we caution that there is a real risk that these circumstances will not be identified.

The Criminal Cases Review Commission has placed on record its concern that a "substantial" number of refugees and trafficked persons may have been wrongly convicted of and imprisoned for criminal offences.[9] Trafficked persons may be reluctant to disclose trafficking or information that would lead to their identification as trafficked persons. These are examples of where identification has and can fail.

Language problems may mask a whole host of other communication and comprehension difficulties and it is also the case that foreign nationals may have much less knowledge and awareness of UK systems and procedures more generally, with the result that misunderstandings are not identified.

We suggest adding that the caution cannot be given where the person's age is the subject of dispute.

We suggest adding that the caution cannot be given where the person has not had the opportunity to obtain legal advice, free if they do not have the means to pay. As set out above, the conditions precedent for offering a caution are not likely to be met unless this has happened.

Paragraph 2.22

We consider that the reference to drawing the on the views of the UK Border Agency needs to be honed. It is important to be aware of situations in which the UK Border Agency will not be in a position to give an impartial view and in which conflicts of interest could arise.

There is a particular difficulty in determining what is achievable within a particular timescale as to date the Agency has not proven reliable at estimating this. This can be seen in the multitude of immigration detention and bail cases in which the Agency has asserted that removal is imminent, then come back before the tribunal months later, making the same assertion, and sometimes for months after that. Bail for Immigration Detainees provided evidence of this in their report *A nice judge on a good day*[10] from which we cite *in extenso* [footnote references have been removed]*:*

> *Many bail summaries argued either that detention was proportionate or that the applicant was at risk of absconding because removal/deportation was imminent. Evidence to demonstrate imminence of removal is important in bail cases because it is a key Home Office argument to suggest risk of absconding on release. …. However this research found that it was rare for the Home Office to provide the Tribunal with any concrete timescale for forcible return to take place or to indicate what steps were being taken to make it a reality.*
>
> *This is despite the fact that in the case of detainees with a criminal conviction, Home Office guidance gives a clear definition of what should be considered to be 'imminent':*

[9] '"Hundreds" of miscarriage of justice claims over legal advice failings', *Law Society Gazette*, 14 June 2012, see http://www.lawgazette.co.uk/news/hundreds-miscarriage-justice-claims-over-legal-advice-failings

[10] *A nice judge on a good day: immigration bail and the right to liberty*, Bail for Immigration Detainees 1 July 2012

> *'removal could be said to be imminent where a travel document exists, removal directions are set, there are no outstanding legal barriers and removal is likely to take place in the next four weeks.'* [UK Border Agency Enforcement Instructions and Guidance, chapter 55.3.2.4]

Instead bail summaries relied on the Home Office's intention to remove or deport applicants, rather than whether they were practically able to do so. Two scenarios repeatedly presented themselves: (i) the use of detention when enforced returns to the detainee's country of origin were not being undertaken and (ii) the use of detention when travel documents were not available.

In five of the cases prepared by BID, the Home Office was either not enforcing, or it was unclear whether it was enforcing, returns to the applicants' countries of origin (in part or in whole). …

The applicant in Case 9 was from Baghdad. The bail hearing we examined was his seventh application during his one year and eight months in detention and it was refused.

Again the Home Office's bail summary noted that the applicant was from an area of Iraq to which enforced returns were not possible

> *'Mr [applicant's name] is the subject of a signed deportation order, however as (sic) he is an Iraqi national from an area where enforced removals are not currently undertaken. Accordingly his removal cannot be considered to be imminent but we are have (sic) the required information to secure a travel document so as soon as the situation changes, removal can be effected within a realistic timescale.'*

Since the US-led invasion of Iraq there have been no enforced removals to that area of the country so it is hard to give much credence to the Home Office's optimism about the applicant's return being possible within a realistic timescale.

…

Two other applicants were from Sri Lanka, a county to where there were no enforced returns during periods of 2009. In one case the bail summary acknowledged that removal would only be imminent once the outcome of the applicant's judicial review was known and 'the country situation allows'.

In the other case the Home Office presenting officer was sent away at the hearing to make enquiries and came back admitting that enforced returns to Sri Lanka were not being undertaken.

For many cases, particularly the unrepresented cases we observed, the barrier to removal/deportation was a lack of travel documents. Without identity documents many countries are unlikely to accept someone the Home Office is trying to forcibly return. This is a particular problem for nationals of countries such as Algeria, Iran and Eritrea whose embassies are either resistant to documenting their nationals overseas or take a very long time to do so. Bail summaries for applicants with travel document problems used circular arguments to justify detention on the basis that removal/deportation would be effected within a reasonable timescale once a travel document had been acquired even though there was no timescale for acquiring the document. This was also the case in bail hearings where the applicant was cooperating with the re-documentation process. For example,

- *efforts are being made to secure travel documents (no timeframe given)*
- *removal is imminent because the 'High Commission has confirmed that the applicant is a*
- *national and we are waiting for emergency travel documents to be issued' (no timeframe given or evidence offered to demonstrate this is the case).*

- *an attempt to remove the applicant in October 2009 failed but 'UKBA and the FCO are working closely with the Iraq Government to iron out the issues which lead (sic) to some of the returnees being sent back, and expect to carry out another flight in the future' (no timeframe given)*
- *his emergency travel document application was re-submitted to the Algerian Embassy on [date in October 2009] and current guidelines show that a decision should be made within a reasonable timescale of six months.'*
- *'whilst it is not possible to give a precise estimate of when a travel document will be available... once received removal directions can be set. [...] we believe that a document will be available within a reasonable period and therefore that removal can be effected within a reasonable timescale' (no timeframe given)*
- *the 'intention [is] to remove the applicant as soon as possible and, once travel documents become available, removal arrangements will commence' (no timeframe given)*
- *removal will be imminent once travel documents are available although 'it is not possible to give an accurate estimate of when a travel document will be available'*
- *the bail summary stated that contact had been made with the Country Targeting Unit who said 'their contact in Algeria confirmed that the [applicant's] birth certificate was genuine but would still be under investigation.' Later on in the same bail summary in the reasons for opposing bail, this exchange was interpreted as 'on [date in early Jan 2010] we were informed that the applicant's birth certificate has now been confirmed as being genuine and therefore a decision on his travel document should be made shortly' (no timeframe given)*

Paragraph 2.31

The time limit for completion in 'exceptional' cases should be the same for foreign offender conditions as for other conditions (20 weeks), not four weeks longer than for other conditions (24 weeks) to ensure fairness and equality of treatment. As set out above, the *UK Border Agency's* Enforcement Instructions and Guidance, chapter 55.3.2.4 provide that a *'removal could be said to be imminent where a travel document exists, removal direct ions are set, there are no outstanding legal barriers and removal is likely to take place in the next four weeks.'*

What happens where it was estimated that procedures could be completed with 24 weeks and it turns out that they cannot (see comments on paragraph 2.22 above)?

We consider that it would be improper for the condition to specific a period longer than that set out in the immigration rules as this would have a punitive element. Foreign offender conditions including the ban on return are not a type of punitive condition and if a punitive condition could only be imposed on foreign nationals this would constitute discriminatory treatment. The immigration rules are placed before parliament which has identified the periods of bans within a scheme designed to ensure that like cases are treated alike. The conditions imposed on a particular caution are not placed before parliament. The risks of like cases being treated differently are high.

The immigration rules set out a period during which refusal is mandatory and we understand this to be the intention with the caution also; this does not preclude a discretionary refusal under the immigration rules after that time. We recall that to avoid a breach of the right to private and family life mandatory bans on return do not apply where the purpose of return is to join a family member and the same restriction needs to be placed on these bans on return.

As set out above, given that those with “no leave to enter or remain in the UK and in respect of whom there is a power to enforce their departure” cannot work or claim benefits, the working assumption absent detailed accurate evidence having been gathered must be that such persons do not have money to meet any incidental expenses. Therefore they are unlikely to have the funds to pay for a passport or a travel document, or indeed to pay for the photographs they need to submit with such an application. To require that they pay for these must be contrary to public policy as it can only be encouraging them to work without permission to obtain the funds.

Paragraph 2.44 is so vague as to give no guidance whatsoever as to when it is appropriate to take into account the views of the UK Border Agency. It must be borne in mind that the UK Border agency will be deciding any application from a person to regularise their stay and that there is a potential for a conflict of interest. This paragraph needs also to be reconciled with the “should” in paragraph 2.50 “the decision-maker should consult with the UKBA.”

Paragraph 2.50
As set out above, in ILPA’s experience the UK Border Agency is not a reliable source of information on likelihood of removal from the United Kingdom within a particular period. Should not the words “not to exceed 20 [see comments above] weeks” be inserted after reasonable period?

Paragraph 3.2 We do not consider that it should be possible to administer conditional cautions with foreign offender conditions at a port or airport. As set out herein, they involve ecomplex matters. Persons require independent advice. The environment is pressurised and the risks of duress and of allegations of duress are high. As cases such as the *Nyombi* case[11] demonstrate the conduct of those involved in removals has been subject to the most grave reproach.

Paragraph 3.3 We can envisage no circumstances in which it would be appropriate to administer a conditional caution in public other than in a courtroom.

Paragraph 3.6 See comments above on legal advice. A person must have the opportunity to obtain legal advice on immigration matters and on the effects of the caution for their immigration status and for future applications. This should be set out in the code. The opportunity should be real and not theoretical, including being free to those without means to pay.

Paragraph 3.7 See comments above on legal advice.

The working assumption must be that 100% of those eligible for foreign national conditions satisfy the means test for legal aid.

Express reference should be made to explaining the particular effects of accepting a caution with foreign offender conditions on a person’s immigration status and on future applications. If the person receives independent legal advice then it may be possible for the person administering the caution to ascertain and record what they understand to be the immediate implications for their immigration status, what they will be required to do, how long before they can apply to return and what will be the implications for any application that they make in future. If the person is not given a real opportunity to receive such advice, so that this is not possible, then it will incumbent on the person administering the caution to set out all these implications. We think that this will be

[11] Cited *supra*.

difficult and question what they will do when the person says that they do not understand, or asks for more detail.

Paragraph 3.8

See comment above on legal advice and see comments on paragraph 3.7 above.

Paragraph 3.10

While we welcome the recognition that language is an issue in the case of a caution with foreign offender conditions we suggest that there will also be persons (including foreign nationals) receiving other conditional cautions who will need the services of an interpreter and need translations. This is required to comply with Equality Act duties.

Paragraph 3.11

The document should be translated where required and a copy given to the person in the language that they understand. In our experience people do not usually retain such detail when it is given to them orally only and particularly when the situation in which it is given is stressful.[12] To provide a written translation where required is necessary to comply with Equality Act duties.

We are concerned that an offender be in a position to get in touch with someone if they wish to withdraw from the caution. There have been instances, most notoriously in the case of *Nyombi*[13] where the UK Border Agency has not allowed a person to get in touch with their legal representative and has affected an unlawful removal. The Home Office admitted liability and paid Mr Nyombi £100,000 in damages. His is not an isolated case.

It will be necessary to impose upon the UK Border Agency and its subcontractors a clear and enforceable obligation to permit and assist a person in detention to notify their withdrawal from the caution and to monitor compliance with this.

Paragraph 3.13

In our experience UK Border Agency record-keeping is unlikely to be sufficiently robust to meet the requirements of paragraph 3.13. We refer you to the reports of the Independent Chief Inspector of the Agency and to his office.

Paragraph 3.16

We do not consider that the UK Border Agency should monitor compliance as it has other interests in the removal and there may be conflicts of interest.

Paragraph 3.20

No guidance is given in this paragraph. As set out above, it is necessary to ensure that a person gets immigration advice before deciding whether or not to accept the caution otherwise situations where these applications are made after he person has agreed to a caution will arise.

[12] See *Foreign national prisoners – All you need to know: 2011 annual conference report*, DAS 2012.
[13] CO/9617/2008 7 February 2009.

We do not consider that it is appropriate to prosecute a person who has accepted a conditional caution with foreign offender conditions who applies to remain in the UK on asylum or human rights grounds. This risks imposing a penalty on a person for claiming asylum or asserting their human rights.

Paragraph 3.23

Again, changes should be explained in a language the person understands and translated and a copy of the changed conditions in translation given to the person. The code should state this on its face.

Paragraph 3.31

You will be aware that section 140 of the Legal Aid, Sentencing and Punishment of Offenders act 2012, inserting a new section 56A *No rehabilitation for certain immigration or nationality purposes* into the UK Borders Act 2007 provides the legal aid sentencing and punishment of offenders act provides that Section 4(1), (2) and (3) of the Rehabilitation of Offenders Act 1974(effect of rehabilitation) do not apply in relation to any proceedings in respect of a relevant immigration decision or a relevant nationality decision, or otherwise for the purposes of, or in connection with, any suchdecision. A relevant immigration decision is defined as any decision, or proposed decision, of the Secretary of State or an immigration officer under or by virtue of the Immigration Acts, or rules made under section 3 of the Immigration Act 1971 (immigration rules), in relation to the entitlement of a person to enter or remain in the United Kingdom (including as to removal or deportation). A relevant nationality decision is defined by reference to nationality laws and to encompass decisions in relation to character. Decisions under relevant European law are also encompassed. It is vital that the person explaining the effects of the caution is aware of these provisions and it would be helpful to see express reference to them in the codes. Again, they highlight to the importance of legal advice on immigration as only an immigration expert is likely to understand all the implications.

ILPA

1 November 2012