

Consultation Response

Secure borders, safe haven: integration with diversity in modern Britain.

From the Shelter policy library

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Shelter

Introduction

Shelter is a national campaigning charity that every year works with over 100,000 homeless and badly housed people by providing a range of housing services. These services include:

- A national network of more than 50 housing aid centres
- Shelterline, our national 24 hour housing advice line
- Three Homeless to Home projects which offer intensive resettlement support to formerly homeless families

In recent years, these services have advised and supported an increasing number of people going through the asylum process. As well as providing advice and assistance through our front line services, our Homeless to Home projects have worked with a significant number of refugee families and helped them to settle into their new communities and to sustain their tenancies.

Based on this experience and following investigative work in a number of local authority areas, we published *Far from home* in January 2001. This report highlighted the unacceptable conditions in which many people seeking asylum are living in the private rented sector. We are pleased that many of the recommendations contained in the report have been implemented and have welcomed the constructive dialogue we have had with government since the report was published.

The publication of the White Paper *Secure Borders, Safe Haven* provides an important opportunity to challenge some of the misconceptions and negative stereotyping that have dominated the asylum debate in recent years and to focus on developing a more effective response to a very complex area of policy. We welcome the opportunity to respond to the White Paper.

Our starting point is that policy should concentrate on giving everyone the opportunity of a decent home and on building mixed and sustainable communities. We therefore strongly welcome the approach set out in the introduction to the White Paper which centres on strengthening community cohesion and social integration. This provides the framework for our response which focuses in particular on:

- Improving the conditions in which people seeking asylum are housed under the dispersal scheme
- Ensuring that those dispersed under the NASS scheme and granted refugee status or leave to remain are effectively integrated into their new communities

- Linking the development of policy and operational issues to the new arrangements set out in the Homelessness Act to ensure a co-ordinated response at a local level

Dispersal

The White Paper (paragraph 4.41) confirms that the principle of dispersal away from London and the South East will continue. We support the dispersal principle and believe that policy should focus on improving conditions for those accommodated under the NASS scheme and on ensuring that they are able to integrate effectively into their new communities.

We welcome the October 2001 review of the dispersal system and support the majority of the recommendations, in particular the extension of NASS support following a positive decision to 28 days and the recommendation that NASS should become less centralised and for resources to be deployed regionally.

With this in mind, we support the recommendation in the recent National Association of Citizen Advice Bureaux report Process Error that NASS should increase the number of regional one-stop advice centres and commit more funding to those already in existence. This would ensure that a fully staffed and operational drop-in advice service available in every dispersal area.

In addition to the recommendations contained in the October review, we believe that NASS should harness the experience of registered social landlords in providing accommodation for vulnerable people with support needs by increasing their role as providers under the NASS scheme.

Rigorous inspection and monitoring of all contracted accommodation should be in place to ensure that minimum standards are met. Outreach workers responsible for monitoring accommodation should be trained by environmental health officers.

The transparency and accountability of NASS should be improved to include publication of performance targets and an annual report, and improved information should be made available to the public.

Integration

Shelter welcomes the clear emphasis in the White Paper on integration as a vital part of the asylum process and the aim of easing the transition from support to independence. However, we are concerned that the introduction of accommodation centres will undermine this.

We welcome the doubling of funding for the Challenge Fund to £1 million and the recognition that refugees require practical support to assist in integration. Specialist support projects like Shelter's Homeless to Home show how vital effective support can be when refugees are notified of their status. There should be more investment in these kinds of services and in one-off resettlement grants to help with start-up costs.

We are pleased with the Government's continued commitment to the National Refugee Integration Forum and hope the major recommendations contained in the accommodation sub-group's paper will be adopted:

- Basic housing advice should begin during the time spent in NASS accommodation. Advice should cover all housing tenures and be fully integrated with welfare advice. The twin roles of accommodation providers and one-stop advice shops should be clarified and more funds provided for advice and support services.
- Advice should cover both the local housing market and other regions. Regional consortia can help provide this information. DTLR guidance on good practice relating to 'local connection' under homelessness legislation is essential.
- Local authorities should be guided to the possibility of 'vulnerability' under the homelessness legislation arising from the experiences of refugees.
- Regional consortia should participate in consultation exercises with local authorities to formulate a strategy to prevent the homelessness of refugees and facilitate their access into housing.
- Funds should be made available for short-term refugee resettlement workers in each cluster area. The need for independent legal, housing and interpreting services in addition to other more basic support needs means that funding needs to be significantly increased to enable refugees to meet the Government's aim of finding and sustaining suitable housing, improving their language skills, finding employment and making positive links with the wider community.
- Plans for the improvement, renewal and replacement of unsatisfactory housing stock in both the private and public sectors should take account of the housing aspirations of refugees.

Local connection

There is an urgent need for the Government to issue guidance to local authorities on the interpretation and application of the test of 'local connection' under the homelessness legislation to ensure that people who are granted refugee status have the same housing rights on leaving NASS accommodation as any other British citizen. Existing conventions between local authorities state that a local connection with a district is created after a period of living in that area for six months.

The local connection issue will increase in significance once accommodation centres are in operation. The White Paper (paragraph 4.29) emphasises the need for asylum applications to be considered quickly and efficiently, so we envisage that many refugees will leave the centres in under six months. Under the homelessness legislation, refugees leaving the centres will be able to approach any local authority in the country, as they will have no local connection with any area. Clarification is also required on whether refugees who have been accommodated for over six months will automatically have a local connection with the authority in which a centre is situated.

The potential migration of refugees into areas that do not have adequate infrastructure in place to deal with their arrival could impact on their ability to integrate successfully into their new communities and could significantly affect local housing, health and educational services.

The Homelessness Act

The White Paper offers a significant opportunity to ensure a more coordinated response at a local level by linking the development of asylum policy and operational issues to the new arrangements set out in the Homelessness Act.

The Act will require local authorities to take a long term, strategic approach to tackling homelessness and emphasises the importance of multi-agency working. Importantly, it requires every local authority to carry out a review of homelessness in its area, including an assessment of the levels and likely future levels of homelessness and the services available to tackle it. Based on this review, authorities must also develop a strategy for tackling and preventing homelessness. In doing so, they must consider homelessness in its broadest sense and not just limit their activities to people who are unintentionally homeless and in priority need.

The reviews and strategies must be based on the following objectives:

- Preventing homelessness
- Securing that sufficient accommodation is and will be available for people who are or may become homeless
- Securing support services for people who are homeless or who have been homeless and need support to prevent them becoming homeless again

Refugees and people granted leave to remain can encounter a range of problems that may leave them at risk of homelessness. Delays in receiving decision confirmation letters can in turn lead to delays in receiving benefits and problems proving eligibility for housing assistance. Language difficulties can also compound their efforts to obtain assistance from local authority housing departments.

Clearly, homelessness strategies will need to take account of people whose application for asylum is successful and from whom NASS will therefore withdraw its support. The strong emphasis on partnership and multi-agency working in the Act, and the increased regionalisation of NASS, provides an opportunity for NASS, accommodation providers and local authorities to work together to incorporate the housing and support needs of refugees and people granted leave to remain.

Local authorities will also need to consider the different factors that could affect the number of homeless people in their district. This should include refugees and people granted leave to remain housed through NASS. It is vital that NASS and accommodation providers make information available about the numbers and needs of people seeking asylum, and the estimated number that will be granted refugee status or leave to remain. This information can then be used by local authorities to inform the development of appropriate services.

NASS should also work with local authorities to ensure that support services are properly integrated. Shelter's Homeless to Home projects demonstrate how the transition from support to independence can be eased by providing help with the practical and emotional factors that are important for a sustainable housing solution.

DTLR guidance states that there should be arrangements to provide joint assessments for vulnerable people approaching the authority for help with housing problems. NASS should participate in these arrangements. Shelter also recommends that NASS offer guidance for a protocol between local authorities, NASS and accommodation providers that offers:

- The exact location of the accommodation units procured by NASS.
- A weekly figure of the exact number and household size of people seeking asylum coming into the local authority area.
- Information about levels of need including health, language and special needs.
- Details of people whose applications are successful and the date when NASS support will be withdrawn.
- Guidance on potential vulnerability issues that are unique to the refugee experience.
- Dialogue with local authorities in order to identify and resolve other issues and problems associated with dispersal arrangements.

Comments on specific proposals in the White Paper.

Induction Centres

We welcome the proposal to replace emergency accommodation centres with new induction centres. Shelter has previously expressed concern about the standards, overcrowding and length of time people have had to stay in emergency accommodation. The use of induction centres will also reduce the use of bed and breakfast accommodation, in line with Government policy.

The key to the success of the induction centres will be to keep to the proposed timetable of a maximum stay of seven days before move-on, whilst ensuring that a comprehensive needs assessment is made for each applicant. Those workers carrying out the assessment must be qualified to identify health, housing and support needs and to match them with appropriate accommodation, facilities and location.

We believe that the buildings used for the centres should meet specified minimum statutory housing standards and appropriate contractual standards for facilities and levels of management. We would like to see a list of criteria published to ensure minimum standards in each centre, relating to accommodation standards, fire safety provision, health and safety, space, privacy, suitability of accommodation for families, women only sections and leisure facilities. Specifications for standards in the centres should meet the same requirements as current housing legislation. All centres must have adequate means of escape from fire and adequate other fire precautions, as defined by the local authority.

Shelter supports the intention to provide people seeking asylum with more information about the asylum process and about the area to which they are being dispersed, but we believe that in addition to an oral and video briefing there should be a written 'welcome pack' for people to refer to as and when they need to. Packs should be specific to each cluster area and provide basic housing advice, details of where to go for help and advice on legal rights and entitlements

Accommodation centres

We do not support the proposal to pilot accommodation centres. We believe this is contrary to the very welcome emphasis elsewhere in the White Paper on the importance of integration and community cohesion, particularly in light of signs that the system of dispersal is starting to function more cohesively.

We believe that there are many examples of good practice throughout the country which are fulfilling the Government's aims of housing people seeking asylum away from London and the South East and providing them with an immediate opportunity to make links with the local community and integrate into mainstream society. We were pleased with the

recommendations in the October 2001 review, which offer a significant opportunity to improve the bureaucracy of the IND and NASS, raise housing standards, support needs and prospects for integration.

We are concerned about the proposed form in which housing advice is to be given at the centres. Funding should be provided for specialist housing advice to ensure those in receipt of a positive decision are made fully aware of their housing rights and options. This would aid in the resettlement and integration of those who receive a positive decision.

For a number of years, Shelter has operated the National Homelessness Advisory Service (NHAS) in partnership with NACAB. This service, which is funded by the DTLR, provides second tier advice to front line agencies who do not have specialist expertise in housing. We are also involved in a pilot project funded by the Legal Services Commission to provide long distance legal advice via the telephone to more than 6,500 agencies around the country, including solicitors firms, law centres and other agencies.

We believe these models could be adapted to provide expert advice to front line refugee agencies and to advisers working in accommodation centres. This would ensure that refugees have access to a high standard of independent housing advice. Shelter would be pleased to discuss the potential of these service models with the Home Office.

As with induction centres we would like to see a list of criteria published to ensure standards in each centre meet the requirements set out in the housing legislation.

The White Paper does not refer to many issues that will need to be assessed during the pilot period (paragraph 4.39) such as size, location and the services available in the centres. The proposed location of the sites away from urban areas will compound feelings of isolation and will make it very difficult for advice and independent interpreting services to visit and supply a consistent service.

We are concerned about the potential for accommodation centres to attract racist elements. Residents of the centres are likely to feel trapped and isolated if they are threatened and intimidated by the local population. Shelter urges the Government to consider incidents in Europe where similar centres have been the focus of extremist groups.

Audit

Shelter welcomes proposals to carry out a thorough audit of all people seeking asylum who are currently eligible for support either through NASS or local authorities. The Government should use this opportunity to ensure that people are housed in accommodation that meets the same standards as accommodation procured through

NASS. The Government should then report their findings. This information should be shared with local authorities to help them to fulfil their duties under the Homelessness Act.

We oppose the proposal to withdraw the option of receiving cash-only support once the accommodation centres are up and running. We believe this will lead to many of the problems that existed prior to the NASS dispersal system, with communities that are already suffering hardship having to support people seeking asylum, causing increased deprivation and overcrowding.

Application Registration Cards

Shelter has always disagreed with the principle that people seeking asylum are placed into an alternative benefits system and believe that the issuing of cards, only to people seeking asylum, could lead to stigmatisation similar to that experienced under the voucher system.

Vouchers

We welcomed the announcement that the voucher system will be phased out and replaced by a cash system in April. The Government should review the level of support for people seeking asylum, which remains too low at 70 per cent of income support.

Reporting

Shelter believes that people seeking asylum should not suffer any financial burden when reporting to a report centre (paragraph 4.45). The Government should ensure this is achieved by increasing the value of support to offset the cost of travel.