Integration Matters: A National Strategy for Refugee Integration

consultation response

Hact is a catalyst for change, developing solutions to issues concerning groups on the margins of mainstream housing provision. Hact combines extensive grant making experience with the vision of a specialist housing development agency. Programmes impact locally through individual projects, but also nationally, influencing policy through the learning they generate.

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October 2004


hact believes that this is an important time for refugee housing in the UK. As a result of much activity, lobbying and debate, there is an emerging consensus on action needed to address the housing and community safety aspirations of the emerging refugee communities across the country. For example, the Chief Executive of the Housing Corporation (which is responsible for investing public money in housing associations and for protecting that investment and ensuring it provides decent homes and services for residents) spoke at hact’s Refugee Housing Integration Seminar organised in Leicester in June 2004:

“The bottom line is that asylum seekers and refugees are the Housing Corporation’s customers - tomorrow’s key workers. We and housing associations more generally have not pulled our weight to date in serving their need. I need to find ways to serve them better and I am very open to ideas as to how to do this.”
Summary

Hact (the Housing Associations’ Charitable Trust) is pleased to provide this response to the Home Office on their draft document “Integration Matters: A National Strategy for Refugee Integration.” We welcome this opportunity to inform the development and delivery of the national strategy. Furthermore, we are grateful for the support given by the Home Office to conduct a consultation exercise focused specifically on the housing and related issues that aid the integration of refugees.

Housing: a keystone of refugee integration

Housing is of fundamental importance to refugee integration. As the first and often insuperable problem that newly recognised refugees face, we would like to see housing given a more central role in all refugee integration strategies.

Housing is, of course, intrinsically linked to other key areas of policy and to employment in particular. Gaining and keeping employment is difficult without stability in housing circumstances.

Mainstreaming

Mainstreaming refugee integration, including housing, is broadly welcomed, as is the intention to include a national key performance measurement. We would like to see a more objective measurement for housing than that proposed in the draft strategy.

For refugee housing to be mainstreamed, it must be integrated into housing strategy, housing policy and housing delivery at all levels. A sense of direction from central government, derived from a shared vision of the place of refugee housing within the mainstream, combined with a framework within which all local actors could operate, is required. Funding criteria and priorities should address how they promote and contribute to mainstreaming refugee integration. Regulators and funders should look at the responsibilities and obligations of the organisations they fund, regulate and inspect and make it clear that a failure to include refugees will be penalised.

Mainstreaming refugees in housing policy must address home ownership and the private sector, Choice Based Lettings and the role of Registered Social Landlords (RSLs) as the preferred providers of social housing.

Mainstreaming refugee housing in delivery requires clarity about the role and contribution made by key players, and their relationships. Local authorities have a key role to play in developing and coordinating local strategies and their implementation. They must be resourced by central government to do this. RSLs were perceived as slow to engage but recent statements by the Housing Corporation are welcomed as providing new leadership. As preferred providers of social housing their role must be incorporated. Both local authorities and RSLs are perceived not to have been good at engaging with refugee communities.

Refugee organisations are crucial and function as bridges between communities and the mainstream, a role that needs to be developed and supported. RCOs need proper, stable, long term resourcing, enabling them to influence strategy and policy more effectively.
There has been some improvement in facilitating transition during the 28 days. Bureaucratic processes, for example, have been much improved. But many people are still not receiving a full 28 days notice. The focus on improvements needs to be maintained and solutions developed to ensure a seamless process of movement from NASS accommodation into mainstream permanent housing.

**Supporting the transition - Sunrise**

Hact supports the introduction of the Sunrise programme. To ensure its success, Sunrise must have effective links with local and regional policy-making and strategic bodies. The programme is also more likely to succeed if there is a strong multi-agency approach to its design and delivery. Hact would like to see liaison with and learning from the current development of the Home’s Office’s Community Gateway scheme designed to support people coming out of prison. Moreover, RCOs need a strong presence in the Sunrise programme and must have confidence in the organisations leading it.

Sunrise should learn from the experience of Supporting People and should have a clear relationship with Supporting People services and strategies locally. Consultation would be welcomed on the specific design and commissioning arrangements for Sunrise.

There is little support for the planned changes to local connection rules. To encourage people to stay in areas of dispersal, it is more important that they feel safe, have access to advice, services and employment.

**Community Cohesion**

The importance of community cohesion underlined in “Integration Matters” is strongly welcomed. Refugee integration should be mainstreamed in this area and should include the dispersal framework. So far, the impact of the dispersal of asylum seekers has often been perceived as negative, with consequent effects on refugee communities. Reports on community cohesion required of local authorities should include the likely impact of migration into an area. The new Race Equality Strategies required of all public bodies should also cover and develop work with new refugee communities.
Introduction

Hact (the Housing Associations’ Charitable Trust) is pleased to provide this response to the Home Office on their draft document “Integration Matters: A National Strategy for Refugee Integration.” We welcome this opportunity to inform the development and delivery of the national strategy. Furthermore, we are grateful for the support given by the Home Office to conduct a consultation exercise focused specifically on the housing and related issues that aid the integration of refugees.

Hact is a catalyst for change, developing solutions to issues concerning groups on the margins of mainstream housing provision. Hact combines a 40 year experience in grant making with the vision of a specialist housing development agency. Programmes impact locally through individual projects, but also nationally, influencing policy through the learning they generate. Hact has been investing in and testing solutions focused on refugee housing since the 1980s. More recently, hact’s Refugee Housing Integration Programme, has provided a dedicated focus for this work within hact and the wider housing and related sectors.

Hact is widely considered to be an expert in the field of refugee housing, developed over many years from our engagement with refugees, their community organisations, housing providers, policy makers and other private and voluntary organisations. As a well established housing specialist agency with strong links with both the refugee voluntary sector and policy makers, hact is uniquely placed to influence refugee housing. We are confident that the development undertaken and the learning generated by our Refugee Housing Integration Programme, co-financed by the European Refugee Fund, provides significant evidence to inform the development of policy and practice at the national, regional and local levels.
Background

hact/JRF refugee housing network

In writing this response, we have drawn on the work of the hact/Joseph Rowntree Foundation (JRF) Refugee and Housing Network. This brought together people with expert knowledge of the issues facing refugees and those with expertise in the housing field, to look at current problems and possible solutions for the housing of refugees. Membership included representatives from central and local government, housing providers and refugee voluntary sector agencies and community organisations. It was funded by the JRF and organised by hact, and met eight times over two years, in different locations, with a mix of speakers, visits and discussions. It presented an interim report in October 2002 to the Minister for Housing, Lord Rooker, and members were also involved in developing policy and practice across the country through various initiatives. Its final meeting agreed the findings and recommendations in December 2003. They focus on the three key stages of integration:

- Accommodating and supporting asylum seekers
- Supporting the transition process – finding and managing a home
- Integration – settling for the medium to longer term

Consultation process

Hact also sought and gained the support of the National Refugee Integration Forum at the Home Office, to conduct a consultation exercise to feed into the strategy to ensure that there is a dedicated focus on housing and related issues from as wide a range of perspectives as possible, including input from representatives of refugee communities, housing associations, policy makers and other housing and related service providers. A briefing document covering the core issues and posing relevant questions was produced and circulated through various networks and via hact’s website. Responses were invited, and some received.

A diverse group of housing providers, policy makers, refugees and their community groups, as well as other agencies working to support refugee settlement were also invited to a one day consultation event hosted by the Greater London Authority at City Hall. Refugee organisations were offered specific financial and policy support to attend, through a payment of £100, transport and childcare costs, and pre-event telephone discussions to help RCOs prepare and feel able to engage fully with the discussions. 56 people attended from all parts of the UK (see Appendix A). The notes from that event, as well as the other responses to the briefing, form the basis of this paper. As well as those who attended the consultation event and made separate responses, hact would like to thank Sue Lukes for working with us to prepare the briefing paper and this response.

This paper

In writing this paper we have addressed key themes that are highlighted in “Integration Matters” and which arose during the process of consultation. We have quoted from the notes taken and the responses sent, but without attribution, since some of the discussions took place on that basis. Appendix A lists the participants in the consultation event, which gives some idea of the breadth and depth of experience involved.

Unless otherwise attributed, all boxed quotes are from the consultation day.
Housing: a keystone of refugee integration

“How can you start in life without shelter?”

“In my experience here in North East we can judge that the first and most important problem which refugees face is housing.”
(from an e-mailed response to the briefing document)

Hact welcomes the recognition within the draft strategy that housing is of fundamental importance. However, hact and many others involved in the consultation event felt that the accommodation section in the document does not reflect its importance. As the first and often insuperable problem that newly recognised refugees face, we would like to see housing play a more prominent role in all refugee integration strategies, and hope that the ideas and contributions gathered here will enable that.

This will, of course, require action by other Ministries and cooperation with them. In particular, we would like to see a target date set in the action plan for the Office of the Deputy Prime Minister to produce guidance and a framework document to link into the other actions proposed in “Integration Matters”, and to ensure that housing contributes to the strategy already produced by the Department of Work and Pensions. Regional Housing Boards and Local Authorities will also be able to draw on this guidance in the design and delivery of their housing strategies, key documents that define the priorities for investment regionally and locally.

Housing is, of course, intrinsically and intimately linked to other key areas of policy and to employment in particular. We explore below the difficulties created for refugees who, as asylum seekers, have been dispersed on the basis of housing availability and then find themselves expected to integrate largely via employment. The importance given to employment in integration should be reflected by a significant role for affordable, secure housing for refugees, because without it they cannot get or keep appropriate employment or reach their potential within the UK.

“Housing and employment are intrinsically linked. It is difficult to find permanent employment without a permanent place to live and vice versa. The situation often arises that someone has housing and then gets a job but can’t afford to take the job as they will no longer be eligible for affordable housing. “

“People want affordable housing so that they can afford to work and they need a little support to enable themselves to get affordable housing and a job. “

“Insecure and expensive housing undermine employment potential”

The importance of housing is supported by research commissioned by the Home Office, conducted by MORI, which showed that housing is a key determinant of quality of life, for both those who have been in the country for a year, and those for two or three years or more.
Mainstreaming refugee provision to achieve integration

All of those consulted, including hact, broadly welcome the approach to mainstreaming embodied in "Integration Matters", but we are aware that it will not be easy or quick to achieve. We hope that the concerns and options outlined here will enable the process to happen in such a way as to strengthen, not weaken, the many innovative, committed and sometimes localised methods of service delivery already developed by those on the front line, especially refugee run organisations.

We welcome the intention to include a national key performance measurement of refugee integration as it relates to housing. We also welcome the proposed longitudinal research that will generate greater understanding of the changing situations of refugees as they settle and integrate in our communities. We are concerned, however, that the measure outlined in “Integration Matters” may not be suitable and will provide little objective assessment of progress towards improving the housing situations for refugees. The reliance of the proposed indicator on the reported satisfaction of refugees compared to the general population is not objective, and if expectations are low then satisfaction may well exist even if the housing situation is not suitable. We urge the Home Office to consult further on a suitable objective indicator.

For refugee housing to be mainstreamed, it must be integrated into housing policy and housing delivery at the local, regional and national level.

Mainstreaming refugee housing strategy

Refugees must form an integral part of regional housing strategies, homelessness strategies, Supporting People strategies, and other national, regional and local initiatives. This requires better coordination between government departments, and between national government and local and regional authorities, including the provision of information on the needs and likely presence of refugees to all relevant bodies. Government needs to mainstream this by ensuring that departments talk to each other and work together, and to take a leadership role to develop this coherence in the approach, the mechanisms and the indicators it uses. Furthermore, to achieve this the culture of separating specialist areas between and within government departments should be explored to identify how far this enables or frustrates joined-up working.

"However, the relationship between government’s approach to asylum issues and the media’s treatment of them also needs to be taken into account. Just as someone’s experience as an asylum-seeker cannot be artificially separated from their subsequent experience as a ‘refugee’, so too is government mistaken in taking a negative approach to asylum-seekers on the one hand and a positive approach to refugees on the other."

Coherence, however, does not mean uniformity. Participants in the lively discussions on mainstreaming sought, instead, a sense of direction from central government, derived from a shared vision of the place of refugee housing within the mainstream, combined with a framework within which all local actors could operate. This coherence and this framework would also assist in targeting funding as appropriate.

The mechanism and the vision were seen to be a problem, not necessarily the housing.
This lack of coherence, leadership, coordination and shared vision needs to be tackled at all levels.

"Local authority departments are often not working together or with Central Government – there is a lack of communications and people are often caught between two systems in conflict"

"The … (local)… refugee Integration and homeless strategy meeting did not involve one refugee led organisation, the excuse being time constraints!"

In order to stimulate this, funding mechanisms such as the European Refugee Fund need to be linked to the integration strategy and used to build capacity. It would also make better use of public funds if, for example, funding for refugee housing through the Housing Corporation’s Innovation and Good Practice fund is linked to the national integration strategy. Also, other funding streams from local, regional and national government, which may not be refugee related, need to ensure that they are accessible to and meeting the needs and aspirations of refugees and their communities. Funding priorities and criteria should look at how far they promote and contribute to mainstreaming refugee integration and how they specifically engage and build capacity of RCOs.

At the same time, the Housing Corporation, the Audit Commission and other regulators and funders, should look at the responsibilities and obligations of the organisations they fund, regulate and inspect and make it clear that a failure to include refugees will be penalised.

We strongly welcome the strategic leadership that has been demonstrated by the Housing Corporation. An action plan was presented by the Corporation’s Head of Policy at hact’s refugee integration event in Liverpool earlier this month. This commits the Corporation to using their influence and presence on each Regional Housing Board to ensure that refugee housing is included in the regional investment strategies. They will be requesting that all 70 development partners address this need and will be selecting at least one development partnership in each region to champion refugee housing. As an example of strong strategic leadership, the Housing Corporation should be commended and this approach part of the national integration strategy.

All such strategies should be subject to scrutiny and audit, to evaluate their effectiveness and reach. Talking to refugees should be part of this process.

Mainstreaming refugee housing policy

The strategy as presented bears little relation to housing policy. For example, it bears no relation to the most important mainstream housing policy areas of home ownership and the private sector. New developments such as Choice Based Lettings are not explored with a view to their utility in relation to the strategy. The role of Registered Social Landlords (RSLs) as the preferred providers of social housing was not mentioned. Again, this was identified as demonstrating a lack of coherence in policy terms in relation to refugees and their integration and for mainstreaming to occur, the strategy must address these significant policy areas. Such coherence was also seen to be difficult to achieve
using an artificial distinction between refugees and asylum seekers, with policy towards
the latter perceived as punitive and deriving from an agenda described as negative.

“The NASS system must include people from the start – not exclude and
segregate. Successful integration begins on the day people arrive not the day
they get immigration status”

Policy contradictions between departments undermine joint working at a local level, and
need some common definitions and approaches. Within the discussions about housing
policy and refugees a further concern surfaced that issues relating to refugees, when
considered, tend to be subsumed into those about established black and minority ethnic
groups, whereas, in fact, there is a need to consider the policy implications of the arrival
of many new migrant communities, not all of them refugees.

We agree with the statement made by the Housing Minister, Keith Hill MP, in a speech he
made on mainstreaming community cohesion in housing (14.10.04). He stated that “The
Government believes that giving tenants a choice over where they live is the best way to
build communities that are stable, viable and inclusive.” In addressing the issue of Choice
Based Lettings and the impact on Black and Minority Ethnic Communities, the Housing
Minister also announced the commissioning of research into the longer-term effects of
choice. This study will look at the experience of the BME community and the effect which
greater choice has on community cohesion. We support this, but would urge the Home
Office and the ODPM to look closely at the experience of refugees and other new migrant
communities, rather than allowing their experience to be subsumed within the wider
experience of established BME communities. Furthermore, we would urge the ODPM to
involve representatives from refugee communities on the Advisory Group on BME
communities and Social Housing Policy and Implementation.

At a local level, particular difficulties with policies operated by local authorities illustrate
the need for clearer guidance and definitions, especially in relation to homelessness
provision, vulnerability, local connection and the core definitions of “refugee.” Refugee
housing policies, however, must also be situated within the need that refugees share with
all local people: for a supply of affordable, secure housing. Affordability, in particular,
rather than the form of tenure is the key to integration.

The other major challenge is the involvement of refugees in developing and defining
policy at all levels.

“People living with the problem should be part of the solution, which they are not.”

“Refugees have the ability to influence policy in housing and social change and
this needs to be tapped into.”

It is hoped that the Accommodate initiative by hact, which is funding partnerships
between RCOs, local authorities and housing providers in ten areas of England, will
produce new ideas about refugee involvement in shaping housing policy and provision.
Such partnerships could promote different housing routes and should be supported and
promoted by the Home Office.
Mainstreaming refugee housing delivery

“Bricks and mortar should be mainstream. Support which is delivered should be specialist but mainstream funded and enabled”

This is a succinct summary of lively debates about responsibility for delivery of refugee housing. There was some agreement that some specialist “bricks and mortar” may be needed, but that this was to be for very specific needs. Debate focused on who should provide what for refugee housing to be mainstreamed, and thus the respective roles of local authorities, RSLs and refugee run organisations. One consensus was reached: that whoever provided frontline services needs to have the trust and respect of service users.

A summary of their relationships are:

**Local authorities** obviously have a key role, and a strong case was made for them to be trusted and resourced by central government to carry it out. There was a perception, however, that they had not been good at engaging well with refugee community organisations (although the same criticism was made of central government and RSLs). Local authorities, on the other hand, believed that central government had attempted to transfer the political risks to them, without devolving the power and responsibility. This was as relevant to the provision of asylum support as to refugee integration.

**RSLs** were perceived as slow to engage in their involvement with refugees, although the recent statements by the Housing Corporation were welcomed as providing new leadership.

> “Housing Associations have a big part to play in providing dispersal housing but have had a small role in NASS so they are a step behind.”

Like some local authorities, RSLs were perceived to suffer as much from ignorance as from unwillingness. Clear information about refugee rights and options is needed, as well as leadership.

> “Winning hearts and minds at the front line of mainstream organisations is critical for making things work”

This was seen as particularly important because some reported significant levels of burnout among those working directly with refugees, ascribed to the pressures of constant change, working with people themselves under great stress and working in a field often devalued by the media and politicians.

**Refugee organisations** already function as bridges between communities and the mainstream, and this role needs to be developed and supported. They also continue their involvement with refugees after the mainstream has provided housing, offering long term support and access to new services as needed. These organisations need proper, stable, long term resourcing, which will resolve many of the perceived difficulties in working with them, such as lack of knowledge about them, issues of capacity, difficulties with engaging them in local processes etc. This, in turn, would enable them to influence strategy and policy more effectively.

Some saw further developments as possible, with refugees setting up more housing associations and taking on the ownership and management of properties for members of their communities, although there was considerable debate about this. One contributor
pointed out that if refugees had become sufficiently settled to take this on, they would be doing so essentially as another black and minority ethnic community group. In order for this to happen, however, support and resources must become available.

**Supporting the transition**

"Integration Matters" identifies the transition process as starting on the day that a refugee gets a positive decision. We identified instead a need to start the support for integration from "day one" (when a refugee applies for asylum). There is a currently unfulfilled need for orientation during this process, which could be part of the new NASS contracts (although it will also need to reach those not supported or accommodated by NASS). This should aim to ensure that, by the time they get a decision, refugees know about and understand the housing options available to them. They should also be introduced to the systems and skills they will need to settle: for example, responsibility for the payment of utility bills could be phased in over that period. This would reduce their vulnerability when they get a decision.

There was general support for the idea of a “welcome pack” explaining rights, responsibilities and options, to be sent to all new refugees. This will not, however, usurp the core role of refugee organisations.

> Many clients won’t read information provided – people want action straight away and word of mouth is far more powerful and effective.

**Accommodation and the transition**

Disruption after the decision should be minimised. Where housing for asylum seekers is suitable for longer term needs, it should be provided and funded to enable refugees to stay on in it if they wish, with the funding simply moving from one government department to another if necessary. The emphasis should be on a seamless move to sustainable or permanent housing. The responsibility of this approach must lie with the commissioners, with the burden of negotiating different funding streams not being placed on service providers.

> Often when people leave NASS they are put into temporary homes which are not sustainable. Because these homes are not sustainable they often become homeless again

The accommodation available on transition or afterwards needs to be varied, however.

> There is need for choice – some want permanent accommodation and support immediately others benefit from move-on hostels. There should be no single model, but we should ensure that there is a range of provision as far as possible so that people have a choice.

Currently, a small number of refugees receive help through the Supporting People programme. There was concern that this funding was established before significant numbers of refugees began to settle in many areas, and has now been decreased. In the first year of the programme, only 1% of all SP funding was targeted at support for refugees. The Home Office and the ODPM should work closely together to ensure that adequate information is available regionally and locally to predict current and future
need, and therefore commission appropriate services. Research on the inclusion of refugees in the Supporting People framework is needed.

Although the Supporting People model may appear cumbersome, some refugee run organisations are keen to be involved because it may involve them in local partnerships and planning and raise the profile of refugee needs. The Home Office and ODPM can assist in this by providing capacity building support, through agencies such as hact, to enable refugee run organisations to meet the accreditation criteria and develop partnerships with existing SP funded services.

The transition process is also complicated by employment considerations. Where work is available, this may also narrow accommodation choice.

[A lot] of single male refugees go into hostel accommodation before permanent housing. This is very expensive. They may end up doing jobs in the grey economy and living on friends’ floors as the only way to save up for a deposit on private rented accommodation.

There is, however, a need to develop more services to sustain tenancies across all sectors, but especially in the private rented sector. The quality of support may be the key to such successful tenancy sustainment.

Who provides the accommodation is not as important as what services are provided in the accommodation as long as the provider is trusted and credible. People can feel more vulnerable in a homelessness centre than in an overcrowded house where there is a sense of community and spirit of camaraderie.

This reflects a further concern: that there are growing numbers of homeless refugees, especially among the hidden homeless, and that local homelessness strategies need to start tackling this problem. A first step would be to ensure that local authorities improve their relationships with refugee run organisations, who are best placed to identify homelessness within their communities.

**Local connection**

Discussions on the consultation day confirmed that there was little support for the planned changes to local connection rules. There was concern that it would have an adverse impact on the more vulnerable.

Young refugees aged 18-25 are very keen to go into employment as soon as they receive refugee status. But often their education has been disrupted, they lack qualifications and the local connection rule may mean that they have to stay in areas where they are unable to find work.

There was unease that a legal solution is being found for problems that have their roots in failures to provide adequate support and housing in areas of dispersal.

Refugees are finding that they are not getting the support they require and so they move out of their cluster area into the big cities where it can be harder to access services etc. It is important that people feel comfortable where they live.

This may also be reflected in more local allocations.
Often refugees know of one or two neighbourhoods where there are high concentrations of refugees and so apply to live in these areas. Housing providers likewise assume refugees, when they apply for housing, want to live in neighbourhoods where there are high concentrations of refugees. This limits the housing options that are available to refugees however. Geographical horizons for housing refugees need to be widened.

In particular, it is important that guidance issued to local housing providers on implementing Choice Based Lettings includes and explains the needs of refugees, and offers options for ensuring that they can use the systems to underpin their settlement and integration.

**Sunrise and the Personal integration Plan**

There was considerable engagement with the idea of Sunrise, which was welcomed. Debates have centred on some core concerns.

**What is needed to ensure Sunrise works?**

All agreed that the involvement and support of local statutory agencies is essential to Sunrise’s success. There was disagreement, however, about their role in delivery of this new service. One model may involve local authorities sub-contracting this to refugee run organisations or a consortium of organisations, but also providing services directly to those who have no RCOs or do not want to engage with their own community organisations. Another suggested model would have the RCOs running it directly. All are agreed that they would need considerable support and capacity building to do so.

Working with the Home Office, hact would be able to offer development and capacity building support for RCOs involved in the pilots, especially in areas where multi-agency service providers are operating (such as hact’s Accommodate partnerships are operating). Some RCOs also have good experiences of sub-contracting under the NASS support contract which should be drawn upon if this model is used within Sunrise.

*Every day RCOs are struggling to cope with the demand for advice and information. They will find the same barriers with Sunrise in regard to paper work and bureaucracy*

And RCOs may not be the preferred service providers in addressing certain needs.

*The Personal Integration Plan seems like a good idea: some refugees, however, including some whose faith and sexual orientation conflict, will present as gay, lesbian or bisexual and will need contact with appropriate LGB organisations, as well as with cultural and faith communities. Some will not be ‘out’ for a variety of reasons - family, religion or any number of other reasons*

*(from a written response to hact’s consultation document on the website)*

There is also a risk that Sunrise will work against mainstreaming, by providing a refugee specific service that may further institutionalise their exclusion. On the other hand, there is the possibility that Sunrise is seen as individualising problems that may be more structural in nature; that, for example, the lack of available housing is seen as the “fault” of the caseworker or service user. There was therefore concern that Sunrise has effective links with local and regional policy-making and strategic bodies. In addition, there should be provision within the initiative for research, needs analysis and policy...
work. Building the capacity of refugee run organisations to offer this as well as the direct service will be a major contribution to community development and cohesion.

Hact strongly supports the introduction of the Sunrise programme. We believe, however, that the programme is more likely to succeed if there is a strong multi-agency approach to its design and delivery. We are concerned that unless all relevant agencies have a stake in the programme, solely commissioning it to the voluntary and community sector risks marginalising its impact and influence locally.

We have been encouraged by the recent developments by the Prisons Service to create local ‘Community Gateways’ for managing the resettlement of ex-offenders from prison into the community. The programme proposes the establishment of multi-agency working with a service delivery and a strategic focus. We believe that through this, the experience of delivering the service and the impact that can be achieved strategically will greatly benefit ex-offenders. We strongly recommend that the IND explores this model with colleagues in the Prisons Service and look favourably on this as a model for Sunrise.

An effective, integral evaluation of Sunrise, that is involved from the start in identifying measures of success, including capacity to influence policy and strategy, will also be crucial. This should follow the progress of all the pilots, and probably continue into full-scale delivery of the service, with an emphasis on sharing the lessons, not only with the Home Office and participating organisations but also with other departments and ministries at a senior level.

Relation to Supporting People

Sunrise programme does fill the gap but is another separate thing for refugees and is this not reinventing the wheel? There are already services out there under Supporting People and this would ensure mainstreaming. Sunrise sets refugees apart again and is not strategic in the sense of aligning with other strategies. Different parts of the Government are using different approaches. Can it not be a part of SP or vice versa?

There was considerable discussion about this at the consultation event, the consensus reached was that Sunrise would be available for a larger number of refugees, including those who do not need the type of accommodation based support that SP offers and funds. It was felt to be important, however, that Sunrise learned from the Supporting People experience of promoting integration, and that it did not replace the use of SP for vulnerable refugees who needed the housing based support it provides.

Supporting People will be an important funding stream for refugees who need housing-related support. The relationships between Sunrise and SP locally will be crucial. During the transition period covered by Sunrise, it may become evident that an individual will need a specialist support service that is not available through the Sunrise programme. Referrals to other specialist support, such as mental health services, and domestic violence services, will be needed and should be facilitated through Sunrise. Supporting People services may also be available locally for further tenancy sustainment work with refugees. If there is a need for such support then Sunrise should link with floating support services that can work with refugees for a further period of time. The Home Office should be aware that negotiations may be needed locally to ensure that referrals into SP services can be taken from Sunrise, which may require a change to SP contracts.
Piloting Sunrise

As regards the piloting of the Sunrise scheme, it would be beneficial for this to be done both in areas where equivalent ‘move on’ services do not exist, or are insufficient or rudimentary, and where they do already exist and are well developed. In the first case, gaps would be filled and the capacity of the scheme to cater for demand would be well tested. In the second situation, the interrelationship between, and comparability of, the Sunrise scheme and existing SP-funded services would be tested.

(from a written response to the consultation)

Piloting should enable the different options for relationships with local authorities to be explored, as well as informing on appropriate service delivery in different contexts. Clearly several pilots will be needed for this. Commissioning needs to avoid competition for these pilots, and to encourage and provide incentives for a range of providers to run them. RCOs need a strong presence in the Sunrise programme and confidence in the organisations leading it. Further capacity building activity will be needed to ensure that RCOs can fully and equally participate in the design and delivery of Sunrise.

Furthermore, to ensure that Sunrise works in areas of both high and low housing demand, the region selected should include areas of refugee settlement that are affected by both.

We strongly recommend that before the Home Office begins commissioning the Sunrise pilots, they undertake a specific consultation on the design and commissioning arrangements. Hact is willing to support the Home Office in this consultation exercise.

The Sunrise Programme should be welcomed as caseworkers will have data on how the 28 days are too short. The Programme will ensure that the Home Office will learn about the importance of housing and how without adequate, secure housing refugees can’t access other things such as education and employment. The key thing with the Sunrise Programme should be about evaluation. The results of the evaluation should act as the basis of a strategy.

Transition period

There was general agreement that the 28 days offered for the transition is far too short, especially in relation to housing. In certain regional centres in the dispersal areas it is simply impossible to access social or private rented housing within this time, with the result that an artificial crisis is created. We welcome measures taken to tackle bureaucratic barriers and speed up move-on during the 28-day period, for example the issuing of NINOs at the same time as the notification of decision. We would like to see this fully implemented and as a minimum, authorities must ensure that refugees get at least 28 days notice as currently it is often less.

We are also very concerned that Sunrise is planned to last for only 28 days. There was agreement that refugees should not expect to have intensive support for too long unless they are very vulnerable, but an allocation of a certain number of days over a longer period would meet need more effectively.

We would recommend that through the pilots, the Home Office test the assumption that 28-days, with follow-up at 3, 6 and 12 months, is appropriate. Experience of resettlement
services for single homeless people, a model that has been in operation for around 10 years, should be drawn upon. This experience often shows that 28 days is not an adequate enough time to make an assessment, develop a resettlement plan, identify housing, make the move and then settle into a new home. If Sunrise is to cut-off more intensive support after 28 days it may fail, particularly in areas where there is not an adequate choice of move-on options. Variations on the proposed model, which may include intensive support for 2 or 3 months, or 28 days support spread over such time, should be tested.

Refugee Integration Loan

There was general support for some form of refugee integration grant, and praise for the Home Office in recognising the need for resources at this point. There was concern, however, that as it was in a form of a loan new refugees would start the settlement process in debt, and that the existence of a loan might actually exclude them from accessing to other resources for training, business start up, New Deal, etc.

The exclusion of refugees with other forms of leave was also of concern. There was agreement that the loan or grant should be extended to those offered Humanitarian Protection, Discretionary Leave or Indefinite Leave to Remain on any backlog clearance programme, especially the latter who may have spent many years on very low income levels. The uncertainty about how the loans would be administered and how repayments would be made, for example, if people started work, may also explain why some would prefer to see it run as part of the mainstream Social Fund. However, if the loan or grant is part of the Social Fund, refugees should not be disadvantaged from accessing additional support that is available through the Social Fund to other people.

“The fact that the loans might be used for purposes that are ‘excluded’ under the rules for Community Care Grants (e.g., deposits for accommodation ….) is to be welcomed. Indeed, it should be ensured that the two types of payment are mutually exclusive, such that refugees are not prejudiced when it comes to accessing grants or other payments from the Social Fund. The rules for grants are framed so as to give refugees full access to these payments, and it would be unfair if this were compromised by the introduction of the loan scheme. Moreover, such an approach would not be in keeping with the principle of ‘mainstreaming’: rather, it must be ensured that refugees have the same chances of obtaining Social Fund payments as other members of the community.”

(from a written contribution)
Community Cohesion

The importance of community cohesion is underlined in “Integration Matters” and this was strongly welcomed. Again, it is vital that refugee integration is mainstreamed in this area. The reports on community cohesion required of local authorities should include the likely impact of migration into an area. It is also important that the new Race Equality Strategies required of all public bodies cover and develop work with new refugee communities. Crime and Disorder Strategies must also involve and serve the needs of new refugees and asylum seekers, especially in areas where they have been the victims of crime.

The impact of the dispersal of asylum seekers has often been perceived as negative, with consequent effects on refugee communities.

Developing a shared understanding of what is meant by community cohesion amongst groups expected to contribute to it, is important to its achievement. Excluding the period of asylum seeking from the integration process is therefore problematic. As asylum seekers, people may feel that they have been ‘foisted’ on poor communities already ill equipped to deal with their own needs. But in some areas, the settlement of refugees has contributed to regeneration. This highlights the value of focusing on the strengths and potential within refugee communities rather than simply their needs. Otherwise the failures in community cohesion are manifested by the scapegoating of refugees for the perceived shortages of good quality homes and jobs.

This relies, however, on the willingness to invest in the local communities before the arrival of large numbers of asylum seekers, and for local decision-makers and opinion-formers to be involved positively from the start in educating and informing local people about the opportunities offered, as well as the potential problems.

For refugees there is no understanding between refugee communities and the host communities. Communities have been planted in existing communities and there is not a mechanism for facilitating this. This lack of information leads to fear on both sides, new migrant communities and the host community. The communities should have a place to come together and share and to learn from and with each other.

One of the most significant barriers to community cohesion in dispersal areas was thought to have been the lack of public space available for personal interaction, where new and long time resident communities can engage. This requires investment, and cooperation with, for example, housing providers, public libraries, NASS and the youth service to develop such common ground. Projects where refugees, asylum seekers and others can meet to some common purpose, such as bringing properties into community use, art, sports and training are the key. This type of integration activity has to be mainstreamed into neighbourhood renewal and regeneration schemes.

It is a sense of shared belonging. The question now is how do we enhance this? The project by hact, Communities R Us, which seeks to foster better relationships between tenant and resident associations and RCOs, is an example. It looks at what joins people and provides resources to realise a common goal.
As noted above, a factor in the creation of cohesive communities is the presence of options for shared experiences. Setting up parallel, and closed, systems creates tensions. Where asylum seekers are unable to work, claim specific asylum-seeker benefits, and live in separate housing, this does not reassure other communities: it creates a sense that these are people with different and unequal rights to participate in local life and allows the unscrupulous to play on fears of difference. In areas, for example, where New Deal and related initiatives are pushing people who have been unemployed for two generations into work, the perceived presence of asylum seekers with no such pressures can be manipulated.

**Communities R Us:** This new hact initiative seeks to build a better understanding of the ways in which long-term residents and newer refugee communities can achieve more positive interaction at neighbourhood levels.

**Working with refugee groups and tenants’ and residents’ associations in three locations, the project will bring communities together to tackle a shared community concern. Hact will provide seed funding and on-going support for joint activity which will act as a focus for involvement.**

**Models of good practice for the development of community cohesion will be identified and disseminated in the form of a community cohesion toolkit.**

(from hact publicity material)

Another factor working against cohesion is the removal of opportunities for refugees to make positive choices about where they live. The development of refugee community infrastructures, both formal and informal, is now making areas of many cities seem attractive options for refugees, alongside the likely presence of family and community members. Local consortia have found that providing incentives such as good housing, training and employment opportunities and good refugee-friendly local services also encourage people to settle and get involved in dispersal areas, enabling the creation of mixed communities. Coercion does not: indeed, it is likely to push people into subsistence only support and staying with communities already under pressure, rather than risk acquiring an arbitrary local connection in an area they do not yet trust.

The increasing numbers of destitute asylum seekers and ex asylum seekers that are now part of refugee communities was a theme raised throughout the consultation event. The experience of s55 of the Nationality Immigration and Asylum Act shed some light on this, but several areas have significant numbers of people with no access to any form of support, who can only stay with friends and sometimes grub a living in the grey economy. This is fracturing communities, and is affecting some more than others, especially those where return is simply not possible.
Role of refugee run organisations

“a crucial resource where they exist, especially in bridging links with the wider public, deriving their strength not only from refugees’ strong impulse to self-help, independence and the desire to make a positive contribution to the society that has provided refuge, but also from the unique resources of their members, such as language skills and understanding of community needs. While they are typically run on a low budget, many have developed a high level of professional competence.” (from Integration Matters)

We welcome the emphasis on refugee run organisations in ‘Integration Matters’. Hact has been at the forefront of promoting and supporting the involvement of refugee community organisations in housing provision and decision-making at all levels. They are clearly the most significant front line resource for many refugees and there are strong arguments for that role to be further developed. We hope, especially through our new Accommodate project, that more models of collaborative work between housing providers can be developed to tap into the resources that they represent. Refugees need to find a place around the table in leadership, strategy and direction at all levels, to be able to influence policy in housing and social change. Many bring with them extensive prior experience in these areas.

The consultation provoked a lively debate about the potential for refugee run organisations to develop, own and manage their own housing, with some enthusiastic about the possibility, seeing it as a natural extension of the self help ethos, and others believing that “bricks and mortar” should be left to mainstream providers, with refugee run organisations working in partnership with them. Hact hopes that Accommodate will contribute to the development of learning in this area, particularly in relation to partnership working.

Some discussion focused on definitions in relation to refugee run organisations or Refugee Community Organisations. Such organisations have always included non refugees: people with other types of status, asylum seekers, family members, failed asylum seekers and others sharing ethnic, national or linguistic backgrounds. As the patterns of migration to the UK change and time progresses, they are likely to include more people with other types of status: workers, second generation young people, people who have become British citizens. For these organisations, distinctions based on immigration status (or lack of it) undermine their ability to work with and represent their communities, and are particularly unhelpful in relation to funding.

RCOs are an astonishing success story given the level of support they receive, in relation to the outputs they achieve. Investment in them is likely to represent real value for money, but only if it is backed by capacity building, support at all levels and integration with a multi-agency framework that operates strategically as well as operationally. With this in place, they represent an effective bridge between communities, services and users. We hope they are offered the fullest possible opportunity to participate in Sunrise.

Of the 350 people in the Bosnian community in Derby, 22 have gone to university, 20 are home owners, and a few have master’s degrees. We are a close community which supports and needs support.
Undertaking consultation and monitoring the strategy

Ideas about consultation at a national level have emerged from the evaluation of the consultation day itself, which also looked at this area. Many participants at the event pointed towards the regional structures, particularly the regional consortia, as bodies for conducting on-going engagement and consultation. Furthermore, many participants felt that consultation should be an on-going process rather than a one-off on particular strategies. Hact was also viewed positively as an agency who could engage with a wide range of stakeholders and provide expertise in areas and consultations such as on refugee housing. Participants would be keen to see the Home Office develop further its relationship with hact to provide this expertise and conduct such consultations in the future, though maybe on a more regional level. Hact is willing to explore this aspect of its relationship with the Home Office further.

Participants from RCOs welcomed the approach adopted by hact through this consultation of pre-event support and the financial contribution made (£100 per RCO). They welcomed the facilitation and capacity building approaches employed and the help with breaking down the barriers relating to the language used by different sectors.

At a local level, there can be a problem with local authorities, who may find it difficult to engage refugees and their organisations because of political constraints. Again, leadership at a national level can help to overcome this, as well capacity building support and sensitivity to the needs of refugee led organisations to engage fully and on equal terms.

It is appropriate that the implementation of the national strategy is monitored by the National Refugee Integration Forum. We are concerned, however, of the limited representation at this forum from RCOs. This is a significant weakness of the NRIF and does not foster the collaborative approach required to deliver the strategy. We welcome the position taken by the chair of the NRIF Accommodation Sub Group, Sandra Skeete, to find ways of addressing this gap.

There needs to be a clear role for regional agencies, such as the regional consortia, to be able to monitor the delivery of the strategy locally. RCOs need to be represented at this level and as expressed above, an on-going and supported process of engagement and consultation will facilitate this. Feeding this information through to the NRIF will be important to develop a clear national picture of the impact of the national strategy.

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Hact
October 2004
Appendix A – Consultation event participants

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Antonia Williams, Neighbourhood Renewal Unit, ODPM
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Claire Downie, IND, Home Office
David Ward, Refugee Housing Association
Deborah Garvie, Shelter
Derek Kinrade, National Information Forum
Dewi Owen, Welsh Refugee Council
Dipali Chandra, Joseph Rowntree Foundation
Duncan Hunt, South of England Refugee & Asylum Seeker Consortium
Emmanuel Munda, Congolese Association
Ephrem Woube, Ethiopian Community in Britain
Ferid Kevric, Derby Bosnia-Herzegovnia Community Association
Feride Baycan, Refugee Women’s Association
Gulam Reza, The Afghan Youth and Family Association
Helen Everett, EMCARS
Isabel Robertson, Greater London Authority
Jaqui Wan, National Housing Federation
John Perry, Chartered Institute of Housing
Jon Lord, Bolton Community Homes
Laurence Chester, Marchbid Ltd.
Lisa Nandy, Centrepoint
Luke Evans, Housing Justice
Lynn Lewis, Eastleigh Housing Association
Magali Campos De Carvalho, GOR South East
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Malcolm Bowler, Dover District Council
Mark Stevens, The Canopy Housing Project
Mary Carter, hact Associate
Maurice Wren, Asylum Aid
Mohamed Abdullah, Sahil Housing Association
Mohamed Siranouic, Derby Bosnia-Herzegovnia Community Association
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