

NACCOM – The No Accommodation Network- Evidence for APPG on Ending Homelessness

NACCOM, the UK-wide No Accommodation Network, is a charity made up of over 50 Full Members across the UK providing vital accommodation and support to destitute asylum seekers, refugees and migrants with no recourse to public funds (NRPF). We support members to grow capacity, promote good practice and call for lasting change to the system including a system of end-to-end asylum support, improvements in the move on process for refugees, and greater access to support and accommodation for all migrants in need.

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1. The Scale of the Problem

Last year 38 of our member organisations collectively provided 272,931 nights of accommodation to 1,907 people including:

- 840 destitute refused asylum seekers who were unable to access asylum accommodation due to being appeal rights exhausted.
- 824 refugees who faced significant obstacles to mainstream housing after the move on period.
- 243 other migrants who could not access mainstream housing or asylum support.

Nearly 2/3 of members reported an increase in the number of destitute people seeking support from their service in 2016-17. Collectively at least 1,118 destitute people had to be turned away from services in the same period (it should be noted that this is a highly conservative estimate, as not all members were recording this information).

Of the destitute refused asylum seekers that moved on from members' services in the same period, 60% were known to access Asylum Support, Statutory Support or some form of leave to remain. Many were unable to move on due to delays with accessing support or a lack of quality legal advice.

2. Causes of migrant destitution identified by our members

2.1 Inadequate legal advice leads to a person's asylum case not being properly represented or advised upon, which can lead to a negative decision on their asylum case thus leading them to lose entitlements to rights, yet still unable to return home.

Of the 38 members who took part in our annual survey only 5 were known to provide advice to OISC Level 2 or 3 or fund in-house legal advice. Many that signposted/referred on reported that there were limited or in some cases no legal representatives available in their area. Reduced availability of legal aid for asylum cases has created legal advice deserts in some areas that mean people cannot access legal advice of any kind. Since 2012 immigration cases beyond the scope of asylum issues have not been covered by legal aid which limits people's opportunity to regularise their status, and can force them into destitution.

2.2 Administrative delays in the Home Office system prevent destitute refused asylum seekers from accessing the support they are entitled to often for weeks or months at a time i.e. Section 98, Section 95 and Section 4. Accessing Home Office support can be challenging due to a lack of understanding of quite complex legal rights and entitlements to support. For a more detailed overview of delays and recommendations for change, see Refugee Action's report '[Slipping through the Cracks](#)'.

2.3 Asylum seekers can only apply to UK Visas and Immigration (UKVI) for permission to work if they have been waiting for a decision for over 12 months and only for jobs on the Shortage Occupation List. In practice this means that people seeking asylum are unable to work, which causes long term issues with accessing employment once they are granted status. This policy also forces people to live

in poverty and hardship, which has consequences on mental and physical health and community networks.

2.4 Once granted status it is common for people to find themselves homeless as they have 28 days to leave the Home Office accommodation they have been residing in. Support offered in this period, either by the Local Authority or the accommodation provider, is often minimal or in some cases non-existent. The shortage of social housing means that without advocacy support, refugees, who may in many cases have mental and physical health issues, are rarely deemed to be in priority need. Within our network, over 50% of our members accommodated refugees in 2016-17.

2.5 Financial support available to newly recognised refugees through integration loans is not sufficient, whilst legislation around 'right to rent' has the potential to impact access to private sector accommodation. For more on these issues and recommendations for change see the [APPG on Refugees report, 'Refugees Welcome?'](#).

2.6 Migrants with NRPF, including refused asylum seekers, are ineligible for certain healthcare services. In our 2016-17 survey, members who recorded changes in health and wellbeing of their service users shared that 57% had seen mental health problems increase, and 50% had seen physical health problems increase. There is a clear risk with leaving such problems untreated including for individuals involved, people that are trying to support them and society more widely.

2.7 Very limited support is available for people who have been trafficked or experienced domestic violence.

People who have been trafficked are entered into the National Referral Mechanism (NRM) and are given a place in a safe house. Safe houses are run by independent charities sub-contracted by the Salvation Army who hold the government contract. After their allocated 45 days in a safe house, people are released without leave to remain and with NRPF. There is currently no statutory process in place to advise on options after the 45-day period. This leads to huge vulnerabilities, as documented in the 'Life Beyond the Safe House' report ([Human Trafficking Foundation, July 2015](#)), and has been described as 'steep cliff edge' by the [Modern Slavery Bill Evidence Review Committee](#).

People who have experienced domestic violence but have NRPF, e.g. due to spousal visas, face barriers to accessing refuge accommodation. This can result in homelessness or a return to a dangerous home environment.

2.8 The process of renewing visas and applying for settlement can be costly and complex, and when it goes wrong, people can quickly become destitute. Members cite examples of people they have accommodated whilst waiting for a visa extension, whilst applying for leave to remain under the 20-year rule, or because they had lost their proof of status.

2.9 There are additional problems for refugees who are granted leave to remain but with NRPF attached to their status, meaning they cannot access mainstream benefits or housing without first challenging such decisions. The process around renewing refugee status can also present a challenge and if no support is available, people may struggle. EU migrants can quickly become destitute if they are unable to find work and do not qualify for Jobseekers Allowance.

2.10 After release from immigration detention, people who are not eligible for asylum support can become homeless if they are released without an address, or the address becomes unviable.

3. Recommendations to tackle migrant homelessness

3.1 *Access to quality free legal advice for all immigration matters*

Improving access to quality legal advice for asylum applicants both at the beginning and end of the process would reduce the numbers of people who are refused asylum, left destitute and unable to return to their home countries.

In addition, bringing immigration advice back into scope for legal aid would enable migrants with non-asylum related immigration claims to access support and, where appropriate, regularise their status.

3.2 A straightforward and efficient immigration system that treats people humanely

The process of applying for asylum, and asylum support, should be made simpler and more accountable. The government should end the process of having to go to Croydon to apply for asylum and Liverpool to submit further submissions (as has been achieved in Northern Ireland).

Home Office officials should follow the law correctly when granting asylum support, and ensure that successful applicants do not wait to access support.

Adequate levels of support including housing should be made available to all refused asylum seekers including those who are in the process of preparing a further submission or in the early stages of considering voluntary return.

Healthcare should be free for refused asylum seekers including those who are appeal rights exhausted. Changes to existing regulations that prohibit such access should be reversed and any regulations that are kept should be accompanied by adequate guidance for healthcare staff. [For more, see the Asylum Matters briefing on the recent changes to NHS Regulations.](#)

People who have been trafficked or experienced domestic violence, who are not eligible for asylum support and are unable to access employment but who are at risk of exploitation or abuse, should be granted limited access to public funds and supported housing whilst assessing their future options.

3.3 Permission to work

Work permits should be granted for persons claiming asylum who have been waiting more than 6 months for a decision on their case or who have been refused asylum but cannot be returned to their home country.

In addition, they should be free to apply for any job or to become self-employed, and should not be limited to jobs on the UK Shortage Occupation List.

3.4 Improving the availability of independent advice and support

More independent advice should be made available to migrants, especially in relation to assisted voluntary return, so that people who have been refused asylum can be supported to identify routes forward.

More support should also be made available to migrants applying for leave to remain via non-asylum routes or renewing their visas, to ensure people do not fall out of the system.

3.5 Extension of the Move On period post granting of refugee status

Refugees should be able to remain in their Home Office accommodation until suitable accommodation is found for them, in line with the Homelessness Reduction Act. They should not be made homeless after 28 days.

3.6 Joint working to increase accommodation for all migrants

Refused applicants should not be evicted from asylum accommodation within 21 days without a support plan in place. Pathways should be developed with input from Home Office officials, Local Authorities, accommodation providers and voluntary organisations to enable the asylum applicant to clearly identify all their options going forward.

Funding for short-term supported housing which is accessed by refugees and migrants with additional needs ('exempt accommodation') should be guaranteed beyond the life of the next Parliament.

Immigration detention should be abolished with funding put back into housing provision, community support and advice services.

4. Causes and Consequences - Real life examples

4.1 Musi's story (name changed)

'I applied for asylum from Zimbabwe in 2010, and was refused the same year. After I was refused, I went to report to the Immigration Centre. I returned to see the locks had been changed on my accommodation and so I couldn't go inside. I couldn't believe it. I was in total disbelief. The inhumanity of it- this is the response I get to my story. Where do they expect me to go? I was really confused. I didn't know what to do... I [went to sleep outside] the shopping centre. I didn't even have a jacket... I only had a short sleeved shirt. I didn't have any money. It is an experience I will never forget. It was the lowest point in my life. It was devastating...

One of my friends told me he had heard of a charity in the city centre who were helping refugees. They gave me bus fare and I came on the Wednesday drop in and told them my story... They asked me if I needed accommodation and I said yes.

Since 2010, I have sent three further submissions, each time with new evidence of my situation. These have all been turned down. I have not been able to apply for Section 4 support in any case because the Home Office did not allow my further submissions to be considered as fresh claims. When I tried to file for judicial review this was also refused. This is problematic because I am not considered to have an ongoing case. Since 2015 I have not had to report for two years. Then in December 2017 I went to report. They spoke to me about voluntary assisted return but I said I do not want to go back. Now I don't have to report until next December. I don't know why- perhaps they think I must be coping somehow.

I've applied to three universities for post-graduate studies and all three have declined my applications for Sanctuary Scholarships owing to the fact that I'm a refused asylum seeker and that my asylum case is not active. So I'm barred from advancing myself on the educational front.

I've been pretty active in terms of volunteering which helps me pass my time and keeps me occupied, but I want to get on with my life. That is a frustration. Because I'm not allowed to work and I've not been given settlement in the United Kingdom, my son and my wife are still overseas. This has created a situation that is now desperate and creating very high stress levels in the family. I cannot give a concrete answer or any measure of certainty because I am in a very precarious situation myself. The issue of destitution hits asylum seekers from all fronts really.'

4.2 M's Story

Originally from Thailand, M. was lured to the UK under a false job offer only to have her passport taken away on arrival and locked in a 'pop up' brothel in London. She suffered physical, emotional, mental and sexual abuse by her traffickers and their customers. She displayed severe symptoms of anxiety, PTSD and depression. She was very withdrawn, could not go out of the house without her body shaking and crept around so as not to be noticed. Loud noises triggered her PTSD and being around young men

increased her anxiety further. She had no eating or sleeping routine and did not take care of her personal needs.

M. went through the National Referral Mechanism but at the end had no leave to remain and was NRPF. Becoming destitute would have only increased her already huge vulnerabilities. Instead, she was accommodated by a host through Hope at Home. She started getting medical help and was supported to find a routine and voluntary work in the local area. The hosts supported M. to attend counselling specific to her trauma and after the first few visits, she began to take public transport on her own.

M. was granted indefinite leave to remain in December 2016 and in 2017 moved into her own flat in July 2017. By this point, her eating and sleeping routines had improved dramatically and she could laugh and see a positive outlook for her future. She said: *"Before, I can't do anything. Everything scared me and brought bad memories but now I can deal with this thing and can walk in town and my body doesn't shake. I've come a long, long way but your family has helped me to be like this. In all my life, no-one has ever given me what your family has given me. Not even my own family. Everyone from your family gives me love. Every single one. Now I am the person I was always meant to be."*

4.3 Susie's story

'When I received refugee status I applied for Employment and Support Allowance (ESA) with the help of my support worker and evidence from my doctor. I also booked my National Insurance (NI) number interview for the earliest possible date meaning my original ESA claim had a temporary reference number associated with the claim as my NI number was being processed. After waiting 1 month, I became worried as to why I hadn't received payment. I was constantly reassured to wait and that there was no problem. I was told my NI number will automatically be linked with my case and that I just need to wait.

It was clear something was wrong when my NI number had arrived but I was still destitute. With the support of my support worker, many visits to the Jobcentre, and continuous calls to ESA, it was finally discovered that my original ESA claim was not matched to my NI number but instead the temporary reference number that was given to me when I originally claimed. This means all the evidence sent through by the Jobcentre agent was returned back to me as though no claim had been made, this of course added even more time to my claim being processed and it was as if I had not made a claim at all.

Regardless, I still responded quickly resending all my evidence again. I was told it will only take a couple of days to match my original claim with my NI number. However, in addition to this, I was then told I needed to have a Habitual Residency (HR) test. According to the Jobcentre, the HR test could not be booked until the previous issue was resolved. All these issues effected my housing options as without the HR test, I would not receive confirmation of ESA and therefore my place at YMCA couldn't be offered until I received confirmation of benefit. My support worker was also in contact with YMCA several times but unfortunately she was unable to negotiate an alternative process for me to be housed. Overall, I waited 3 months from making a claim for my benefit to being paid. This also meant I couldn't be housed until I received confirmation of benefit.'

5. Examples of Good Practice from across the Network

Across our 52 members accommodating destitute refused asylum seekers, refugees and migrants with NRPF there is a wealth of good practice models, all different dependent on the local context and needs. Broadly, schemes involve one, or a combination of, the following:

- Housing Projects- Charity supporters inherit or buy houses that they lease out at reduced rates or rent-free. Sometimes empty buildings owned by faith groups become available, and

occasionally hard-to-let or empty properties awaiting demolition owned by Housing Associations have been utilised on a temporary basis.

- Hosting Schemes- Hosting is when someone offers a room in their house to someone else free of charge. Networks of volunteers work together to accommodate people either individually or as a group. For more details about good practice in this area, see our [Hosting Toolkit](#), produced in July 2017 with Homeless Link.
- Night Shelters- Provision is usually offered in buildings owned by faith groups but models vary across the country. Some are on a single site, others are hosted by venues for a week at a time, or operate around seven venues, each taking one night a week. One of our members, Housing Justice, also coordinate the Churches and Community Night Shelter Network (which includes several NACCOM members). For their latest impact report [see here](#).

For further examples of models of accommodation across the network, see the 2015 report for Praxis, Housing Justice and NACCOM, [Models of Accommodation and Support for Destitute Migrants with NRPF](#). For more on models of immigration advice, advocacy and representation for destitute refused asylum seekers, see the [2015 report by Gina Clayton](#). All of NACCOM's annual reports can also be found [here](#).

Examples of accommodation models across the network:

5.1 Nottingham Arimathea Trust (Housing)

Nottingham Arimathea Trust (NAT) manage 20 properties (sourced by Housing Associations, social investors and private landlords), currently housing 57 residents (19 destitute refused asylum seekers and 38 newly recognised refugees). The service operates as a cross-subsidy model, with accommodation funded either through refugees paying housing benefit/rent or through exempt accommodation status (whereby the charity receives higher rates of housing benefit from the council for refugees with recognised support needs). Rooms in each house are made available to people with NRPF free of charge. All residents access one-to-one support from staff and volunteers to ensure that they have the best possible chance of moving on to independence after being accommodated. In 2018, in partnership with Nottingham City Council, NAT will also start providing emergency accommodation for people who have been trafficked or exploited.

5.2 Praxis Community Projects, London (Housing)

Since 2015, Praxis Community Projects has provided accommodation for people with NRPF through a cross-subsidy model of housing and support working with a social investor, Commonweal Housing. The scheme supports destitute migrants and migrant families with children. Accommodation is purchased by Commonweal and leased to Praxis. Praxis sub-lets bed-spaces to Local Authorities (LAs) to house migrant families (who are eligible for support under Section 17 of the Children's Act). Income from LAs enables Praxis to provide a smaller number of free bed-spaces to destitute migrants with NRPF. Praxis also provide wrap-around support, workshops, and expert legal advice and in 2016 alone provided 10,300 nights of safe accommodation through this service.

5.3 Coventry Migrant Women's House (Housing)

Coventry Migrant Women's House started in 2016 to support asylum seeking and migrant women with NRPF. It is run by a team of volunteers who organise moves, house meetings, funding, administration and maintenance, with additional support from the Quaker Meeting House. The house itself is managed and run by residents, with a nominated facilitator resident who flags up any issues to Trustees/volunteers. Residents are given a time limit in the accommodation and are required to

continue working with an immigration advisor/solicitor. Before they move in residents are required to demonstrate that they have some knowledge and confidence to pursue cases independently. In the past 12 months, five people have moved out of the house: one had Section 95 support re-instated, two had Section 4 support granted, one was granted papers and moved into mainstream support, and one moved into informal community support.

5.4 Open Door North East, Teeside (Housing and hosting)

Open Door North East (ODNE) supports asylum seekers and refugees across Middlesbrough, Stockton and Hartlepool. The team provide a range of services including accommodation (housing and hosting), "Move On" advice for refugees, drop-ins, a refugee work club, English classes, enterprise projects and volunteering opportunities. The housing project operates as a cross-subsidy model, with rent/housing benefit from refugee tenants in the 37 properties (3 owned or provided 3 rent free; the remainder privately owned and managed by ODNE as a social lettings agent) funding 13 rooms for those with NRPF. ODNE also run a hosting scheme for destitute refused asylum seekers and work closely with another NACCOM member, Depaul Night Stop North East in this. Night Stop provide temporary (up to 10 days) hosting prior to a longer-term placement with ODNE. In 2017, 31 people with NRPF were housed or hosted by ODNE, of whom 14 achieved positive move on; 11 were granted Section 4 or Section 95 and 3 were granted leave to remain.

5.5 DASH, Huddersfield (Housing and hosting)

DASH is a small scheme offering accommodation and support through hosting and housing. Hosting is offered by local residents and DASH provide a small subsidy to support the volunteers. DASH also manage three shared houses, accommodating 11 people, and hope to acquire a fourth house with 2 bedrooms in the near future. In 2016-17, DASH accommodated 14 people and supported two destitute refused asylum seekers, both with severe medical problems, to get Human Rights Assessments that enabled them to move onto statutory services. DASH also had some experience of accommodating destitute families with NRPF until Section 17 support and accommodation could be found for them.

5.6 St Augustine's Centre, Halifax (Hosting)

St Augustine's Centre is the only support agency for asylum seekers and refugees in Calderdale. In 2016 they began developing their small-scale hosting scheme (set up for destitute refused asylum seekers) to include homeless refugees as well. The scheme is now fully funded by Calderdale Metropolitan Borough Council (CMBC) and operates in partnership with CMBC's Housing Team. It provides refugees with a straightforward route into accommodation alongside support to manage tenancies and avoid falling into debt, whilst continuing to support destitute refused asylum seekers. The partnership also enables training for council staff and shared learning across different sectors. In Jan-June 2017, 13 people were accommodated, 140 people were supported with housing related issues, and 10 training sessions were delivered.

5.7 Hope at Home, UK-wide hosting scheme for people who have been trafficked

Hope at Home takes referrals directly from safe houses, and matches people who have come out of the NRM with trained and supported volunteers offering a spare room in their house. Safety, stability and family-style support provides time for recovery and helps promote steps towards independent, healthy and resilient lives. Currently there are no other hosting schemes in the UK specifically for people who have been trafficked.

5.8 One Roof Leicester (Night shelter and housing)

One Roof Leicester (ORL) supports destitute refused asylum seekers, refugees, EU migrants and British nationals. Their accommodation service includes a housing scheme and night shelter. The housing supports local people including refugees and destitute refused asylum seekers. Housing is bought with resources from local faith groups and other ethical investors and the charity receives a higher rate of housing benefit for residents through exempt accommodation status. ORL also coordinates the Leicester Winter Night Shelter, a multi-faith volunteer-run project that rotates around seven venues from December-February. The shelter provides accommodation and food and works in partnership with local services to ensure that each person's needs are identified and long term solutions developed. Last year, over 250 volunteers provided hospitality and friendship to 24 guests. ORL also works with Refugees at Home (also NACCOM members) and British Red Cross to support refugees and destitute refused asylum seekers who have been using the shelter into alternative accommodation.

5.9 ASSIST Sheffield (Hosting, housing and night shelter)

ASSIST Sheffield is a South Yorkshire charity supporting destitute refused asylum seekers with accommodation, financial assistance, (non-legal) case-work, accompanying and signposting to other local services. In 2016-17 81 people were supported by the charity, the majority of whom accessed accommodation. The accommodation service includes a night-shelter, run in partnership with a local church, with 12 bed-spaces per night. The service is run by a team of volunteers, supervised by a member of staff, and is open for 10 months of the year, five days per week. At weekends residents access short-term hosting placements with volunteers. The charity also run six shared houses, with management overseen by a member of staff, and volunteer teams run regular house meetings for residents and provide maintenance support. There is also a longstanding hosting network, currently made up of around 40 households, which is supported by the Hosting Support team (volunteers who are allocated as a hosting buddy). Volunteers also recruit and train new hosts, and the charity provides a small financial weekly contribution to host households.