

## Consultation Response Form

**This is the response form for the consultation on the green paper, *Integrated Communities Strategy*. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. The comment boxes will expand as you type. Required fields are indicated with an asterisk (\*).**

Full details of the proposals being consulted on can be found at <https://www.gov.uk/government/consultations/integrated-communities-strategy-green-paper>.

The consultation will begin on Wednesday 14<sup>th</sup> March 2018 and will end on 5<sup>th</sup> June 2018. All responses should be received by no later than 23:45 on 5<sup>th</sup> June 2018.

To prevent losing your responses, you may wish to draft your response to the questions in a Microsoft Word document, before copying and pasting into the form.

### **Navigating the form**

There are 14 questions in this form. You **do not** have to answer every question.

### **Submitting additional information**

At the end of the form information is provided on how you can submit additional information or evidence to support your consultation response.

Thank you for taking the time to complete this form. Your responses will inform how we take the proposals forward.

## Your details

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**Are you happy for the Ministry of Housing, Communities and Local Government to contact you to discuss your response?**

Yes

**Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?\***

***Please select an item from the drop down menu:***

Organisational response

***Please provide the name of your organisation:***

NACCOM

**If you are responding on behalf of an organisation, please select the option which best describes your organisation.\***

***Please select an item from the drop down menu***

Voluntary and Community Organisation

***If you selected 'Other', please state the type of organisation:***

Click here to enter text.

**General Overview**

The questions in this section relate to the Introduction – Building Integrated Communities.

### **Question 1**

**We define integrated communities as communities where people - whatever their background - live, work, learn and socialise together, based on shared rights, responsibilities and opportunities. Do you agree with our definition?**

***Please select an item from the drop down menu***

No

***Please enter any additional comments below:***

For people to enjoy living in a community and feel included in it, which is understood to be the aim at the heart of this definition, there needs to be structures in place for people of all backgrounds to live, work, learn and socialise.

Sadly, years of inhumane immigration policy have eroded the opportunity for many people who would love to be part of British society to engage with these structures. It is therefore essential that any integration plans are implemented hand in hand with a change in culture and policy at the Home Office.

Below, are some examples of where integration and immigration policies do not correlate. More examples are shared throughout this consultation.

#### **People seeking asylum**

People who come to the UK to seek asylum cannot work whilst they await a decision. Meanwhile they are forced to live in no-choice accommodation – often in poor conditions – and have to live on a subsistence fund that is 70% less than income support. In these conditions it is very difficult to see how people can be expected to do anything other than ‘survive’, with some Home Office guidance recently issued suspending people’s right to study during the waiting period as well.

Furthermore, government policy allows people who have been refused asylum (often on wrongful grounds) but have not been removed from the country to become destitute and homeless whilst they attempt to re-engage with the system. Without the support of charities and community networks, people in this situation would be left to starve on the streets or face exploitation to survive. Research from our annual survey last year showed that 60% of refused asylum seekers supported by our members went on to positive outcomes including asylum accommodation, statutory support or in some cases leave to remain.

#### **People seeking to regularise their immigration status for other reasons**

Since 2012, Legal Aid funding has been drastically reduced across all sectors and is not available for any immigration advice outside of asylum. This means that many people who need assistance to get their immigration status regularised are cut off from legal access.

At the same time, fees for renewing visas have increased astronomically.

All this means people who are outside of the system but want to remain, and contribute to life, in the UK are often excluded from doing so.

### **People who have recently been granted leave to remain**

Once people have been granted status they are given 28 days notice before being evicted from asylum accommodation and having their asylum support stopped. This timeframe, known as the move on period, does not allow enough time for people to start receiving benefits and find alternative accommodation. Instead it causes destitution and homelessness. Alongside the human costs of this policy, it is not in line with homelessness prevention policy (which has recently extended the timeframe that a person can be deemed 'threatened with homelessness' from 28-56 days).

### **Detention – of Immigrants**

Persons seeking safety with the UK are liable for detention. They can be held in detention indefinitely, and then often released into the community. This senseless restriction on a person's liberty is a significant barrier to integration. Detention can have a significant effect on a person's wellbeing and trust of the state. For those who go on to get status and permanently live in the UK, they must overcome the affects detention may have had on them, in addition to all the other pressures of settling into a new country.

## **Question 2**

**We believe that the varied nature and scale of integration challenges means that tailored local plans and interventions are needed to tackle the issues specific to particular places. Do you agree?**

***Please select an item from the drop down menu***

Yes

***Please enter any additional comments below:***

It is clear that this strategy requires both national leadership and visionary local government to be delivered. Yet crucially it also requires funding. If the British government is committed to supporting people to integrate then they need to commit more centralised funding (even if this is then administered locally), and the Green Paper does not indicate how much commitment there is towards this.

Regional Strategic Migration Partnerships (RSMPS) are key to effective delivery of services and local/regional strategy, and have been demonstrably effective at overseeing the Vulnerable Persons Resettlement Scheme (VPRS) in some areas. Yet when it comes to dispersal for people seeking asylum, their approach is not standardised and this can be problematic. RSMPS could be a more effective tool in developing strategic plans that are locally driven if they received more funding, support and a national champion.

The Refugee Integration and Employment Service (RIES) which supported refugees with community integration and employment was a good example of effective use of central government funding but it was closed down in 2011 and no like-for-like service has replaced it. Indeed, until very recently there has been no integration support services in place for refugees which has put a huge strain on community networks and voluntary sector organisations.

A replacement of this service would be the best way to bring together the various, often piecemeal, strands of move on assistance that are currently available, reduce risks of a postcode lottery (especially in new dispersal areas) and demonstrate a commitment from the government to make refugees of all backgrounds, however they came to the UK, welcome.

On this, a lot can also be learnt from devolved regions. In Scotland, the government has worked in partnership with local agencies, communities and refugees, to champion integration through the 'New Scots Model'. This model, which was recently renewed in January 2018, is underpinned by five key principles, 1) Integration From Day One (not just following status), 2) A Rights Based Approach, 3) Refugee Involvement, 4) Inclusive Communities and 5) Partnership and Collaboration.<sup>1</sup>

Such principles should underpin the UK government's approach to integration as they would make a lasting difference to individual lives, voluntary organisations and communities as a whole.

### **Question 3**

**Do you have any examples of successful approaches to encourage integration that you wish to highlight, particularly approaches which have been subject to evaluation?**

***Please select an item from the drop down menu***

Yes

***Please enter any additional comments below:***

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<sup>1</sup> New Scots Model: <http://www.gov.scot/Publications/2018/01/7281/3>

Taking the description of 'integration' as a process which results in all people, whatever their background, being able to live, work, learn and socialise in a community, NACCOM's members reflect a wide range of successful approaches.

These include:

### **Hosting refugees in your home**

Refugees at Home is a small UK based charity aiming to connect those with space in their home with asylum seekers and refugees in need of accommodation. Through opening their home up to newcomers, both hosts and guests are able to learn a great deal about each other's cultures. Since they rolled out in February 2016, Refugees at Home has made more than 1,100 placements and hosted for over 75,000 individual person nights.

Here is a recent quote from a Refugees at Home host

May 16<sup>th</sup> 2018 – "Having M to stay has been more like having a friend to stay. He's easy going, full of interesting facts and stories and a fantastic cook. He has been a huge support and help to another refugee we host who does not know English or the UK system well – M has been able to work with us to guide him through.

We've found hosting to be a real joy and have learnt the support of our community through it- we've been given bikes for everyone to get around, invites for our two guests to meals, birthday parties and cups of tea. A group from our church even wanted to give our guests Christmas presents and made up Christmas hampers for them."

### **Specialist supported housing**

**Action Foundation** based in Newcastle Upon Tyne aims to empower asylum seekers and refugees to find pathways out of destitution and extreme poverty, access vital services, increase their skills and employability, integrate and live independently. Over the past year, through their Housing and Hosting projects, they provided 23 beneficiaries with safe and secure accommodation and supported them to attend English classes, integrate, access legal support and volunteering opportunities. They also provide accommodation, specialist support and advocacy for newly granted refugees at risk of homelessness and over the past year have supported 79 refugees across 14 properties. 97% of refugees that moved-on did so positively. Their Language project runs 40 'Skills for Life' English classes and employability courses each week in Newcastle & Sunderland for over 310 vulnerable migrants unable to access mainstream ESOL courses. Last year they successfully supported 1,328 clients from over 86 countries with the help of 188 volunteers (20% of whom were (ex)clients or from the wider migrant community).

**Nottingham Arimathea Trust** works to support destitute asylum seekers and newly recognized refugees. They are committed to providing holistic and service user led support to each resident they house. They provide additional projects such as a weekly conversational English class, a gardening project, trips to places of interest and cultural festivals to help residents learn about life in the UK and the other cultures and religions that live alongside one another in

Nottingham.

They work to empower residents through encouraging them to be pro-active and do things for themselves as time passes - therefore building skills for managing a tenancy in the UK independently. Further work they are developing is training residents in advocacy and community leadership, and providing opportunities to attend conferences and get involved in social action campaigns. In 2017 they led a Commission into Sanctuary in Nottingham through Nottingham Citizens, and within this work, many of their residents got involved in peer to peer research which helped gather momentum and evidence for change.

**One Roof Leicester** provide a home for people with low to medium support needs who are affected by homelessness this includes British homeless people, destitute refugees, EU migrants and refused asylum seekers. They currently have four houses which provide accommodation for 12 people. One third of the bed spaces are for individuals with no recourse to public funds.

They also run a multi-faith winter night shelter and use B&B accommodation to provide short-term emergency accommodation for those who are extremely vulnerable or rough sleeping. The 250 night shelter volunteers from different faiths, nationalities, ethnicity and ages are inspired and committed to providing hospitality, friendship and practical support.

By supporting different groups of the community together they are able to learn from each others experiences. They also encourage local faith and community groups to provide support, befriending and mentoring to homeless residents living in their community.

### **Employment support**

Founded in 2016, The Entrepreneurial Refugee Network (TERN) is a pioneering new social enterprise that supports and empowers refugees in the UK to thrive through the power of their own ideas.

TERN has run five programmes supporting over 70 refugee entrepreneurs. Their programmes are based on personalised support, recognising that each individual comes with unique experiences and faces different challenges.

At the first stage, the TERN pre-Incubator, they help refugees at an earlier stage of entrepreneurial development discover if starting a business is the right pathway. During this phase, they provide access to part time employment via employment partners – allowing participants to keep their options open. In the following phase, the TERN incubator, they assist more advanced entrepreneurs in understanding the local market, trends and customer needs; in growing their business networks and in accessing business finance. TERN On Demand is there to provide flexible support for entrepreneurs unable to access these programmes.

## Chapter 1: Strengthening Leadership

The questions in this section relate to Chapter 1: Strengthening Leadership.

### Question 4

**The Green Paper proposes that we need to build the capacity of our leaders to promote and achieve integration outcomes. Do you agree?**

*Please select an item from the drop down menu*

*Not sure / don't know*

*Please enter any additional comments below:*

No Comment

## Chapter 2: Supporting New Migrants and Resident Communities

The questions in this section relate to Chapter 2: Supporting New Migrants and Resident Communities.

### Question 5

**The Green Paper proposes measures to support recent migrants so that they have the information they need to integrate into society and understand British values and their rights and responsibilities. Do you agree with this approach?**

*Please select an item from the drop down menu*

Yes

*Please enter any additional comments below:*

There are a number of measures within the Green Paper that if implemented could be very useful, such as support with English learning, employment, mental health support and orientation. However, as mentioned elsewhere, the frustration is that many of these barriers could be addressed much earlier in the asylum journey with a fairer and more humane immigration policy. Some examples are given below:

#### **Orientation**

The pledge to support the development of, and share learning from, interventions around work with refugees is significant as the Post Grant Appointment Service (PGAS) was rolled out nationally last winter, but there has (at the time of this consultation) been no public sharing of findings from the 'warm handover' pilot that preceded it. Any learning that can be shared on how refugees are being



contacted through the service, and the degree to which this is improving access and reducing hardship, would be most welcomed.

Relatedly, we are concerned that this section of the paper – and indeed the PGAS itself- mentions very little about housing, surely the most basic of needs for anyone looking to survive, let alone thrive, in a community. Learning from the PGAS could help with developing early intervention support for refugees around housing options and reduce risks of homelessness.

Regarding the appointment of LAASLOs, it is hard to see how these appointments will make a considerable difference. Whilst any support with move on is welcomed, it would make more sense for this to fit within a more strategic approach to refugee integration, beginning with a longer move on period for refugees to transition from asylum accommodation. This would also provide more time for people to start receiving benefits and in this way reduce risks of hardship and homelessness considerably.

A related issue is around financial support after move on. Here, Integration Loans could be a really useful tool to assist refugees with housing deposits and other essential outgoings. Yet the process to access them is complex (especially without proof of address and all the related delays with bank accounts) and not all applicants are accepted. Indeed, data from 2015-16 showed that only 64% of applications were successful, and not as many applications were made as expected that year. Furthermore, the average loan granted was under £500, which does not meet the private sector rental market costs for deposits in many areas. Questions need to be asked about why these problems exist (do the Loans need to be better promoted? Does the form make it clear enough how to apply without proof of address? What are the criteria for a successful application? Is there a maximum amount that would be granted?) so that Integration Loans can be more effectively utilised in the future.

## **Employment**

The most expedient way to help refugees 'overcome the barriers they can encounter when seeking employment' is by giving asylum seekers the right to work. This is a right that would not only reduce mental health problems and improve wellbeing (not least by reducing risks of exploitation) it would also mean that when granted status people could easily demonstrate employment skills whilst in the UK.

## **Healthcare**

Whilst any support to reduce mental health problems is welcomed, this proposal sits against a backdrop of devastating moves from the Home Office and Department of Health in 2017 to actively reduce access to secondary and community health care for many people in the immigration system including but not limited to refused asylum seekers (who may re-engage with the system and become recognised as refugees in the future).

### **Question 6**

**The Controlling Migration Fund was constructed to deal with the short-term migration pressures and associated costs that local authorities can encounter. Do you think it adequately achieves this objective?**

***Please select an item from the drop down menu***

*No*

***Please enter any additional comments below:***

The Controlling Migration Fund has, amongst other things, led to the introduction of LAASLOs in several districts to support with refugee move on. Whilst it is clearly too early to tell what the outcomes of these appointments will be, one person's appointment is not going to be enough to impact the majority of people in that area.

Voluntary organisations, faith groups and community networks will still have to meet the shortfall in capacity, but in the vast majority of cases without additional funds to resource this.

There is also, as mentioned earlier, a need for more strategic development of, and resource behind RSMPs.

### **Chapter 3: Education and Young People**

The questions in this section relate to Chapter 3: Education and Young People.

### **Question 7**

**The Green Paper proposes measures to ensure that all children and young people are prepared for life in modern Britain and have the opportunity for meaningful social mixing with those from different backgrounds. Do you agree with this approach?**

***Please select an item from the drop down menu***

*Not sure / don't know*

***Please enter any additional comments below:***

Click here to enter text.

### **Question 8**

**The Green Paper sets out proposals to support parents with their choice of out-of-school education settings. Do you agree with this approach?**

***Please select an item from the drop down menu***

*Not sure / don't know*

***Please enter any additional comments below:***

Click here to enter text.

## **Chapter 4: Boosting English Language**

The questions in this section relate to Chapter 4: Boosting English Language.

### **Question 9**

**(a)**

**The Green Paper proposes a number of measures to improve the offer for people to learn English. Do you agree with this approach?**

***Please select an item from the drop down menu***

*No*

***Please enter any additional comments below:***

There is clearly a cross-sector appetite for more English learning provision. It makes economic, social and political sense. Indeed, British Future research from June 2017 showed that the statement 'The Government should provide more support for teaching people to speak English' was agreed with by a net figure of 67% of those polled.

However, again there is a backdrop of problems against these proposals. National regulations currently prevent many asylum-seekers and migrants from attending subsidised English classes.

It is not enough for this strategy to rely on voluntary organisations to provide this support without funding, many of whom are under resourced and over capacity.

**(b)**

**Do you have any other suggestions on how we can improve the offer for people to learn English?**

***Please select an item from the drop down menu***

Yes

***Please enter any additional comments below:***

Refugee Actions recent report - Let Refugees Learn <https://www.refugee-action.org.uk/wp-content/uploads/2016/11/letrefugeeslearnfullreport.pdf> sets out clearly the things that need to happen to enable improved access to English language learning for refugees, they include; creating a fund for language learning, enabling asylum seekers to learn English and facilitating a national framework for community based approaches.

Conversation clubs have proven to be a great way to both foster integration and for people attending to develop their English skills. However funding for such projects is scarce. Dedicated funding for community based conversation clubs which compliment more formal esol classes, would assist in improving language learning.

## **Chapter 5: Places and Community**

The questions in this section relate to Chapter 5: Places and Community.

### **Question 10**

**The Green Paper proposes measures to ensure that people, particularly those living in residentially segregated communities, have opportunities to come together with people from different backgrounds and play a part in civic life. Do you agree with this approach?**

***Please select an item from the drop down menu***

*Not sure / don't know*

***Please enter any additional comments below:***

Click here to enter text.

## **Chapter 6: Increasing Economic Opportunity**

The questions in this section relate to Chapter 6: Increasing Economic Opportunity.

### **Question 11**

**The Green Paper proposes measures to provide tailored support to people, especially those who may not currently be active in the labour market, to build their confidence and skills to take up employment. Do you agree with this approach?**

***Please select an item from the drop down menu***

*Not sure / don't know*

***Please enter any additional comments below:***

Click here to enter text.

### **Chapter 7: Rights and Freedoms**

The questions in this section relate to Chapter 7: Rights and Freedoms.

### **Question 12**

**The Green Paper proposes measures to encourage integration and resist divisive views or actions. Do you agree with this approach?**

***Please select an item from the drop down menu***

*Not sure / don't know*

***Please enter any additional comments below:***

Click here to enter text.

### **Question 13**

**The Green Paper proposes measures to address practices which can impact on the rights of women. Do you agree with this approach?**

***Please select an item from the drop down menu***

*Not sure / don't know*

***Please enter any additional comments below:***

Click here to enter text.

## Chapter 8: Measuring Success

The questions in this section relate to Chapter 8: Measuring Success

### Question 14

**The Green Paper proposes core integration measures for national and local government to focus on. Do you agree these are the right measures?**

*Please select an item from the drop down menu*

No

*Please enter any additional comments below:*

<p>There are no indicators around secure housing/accommodation something that would be relatively straight forward to monitor, and is an essential part of integration. Being homeless and destitute can significantly impede your integration.</p>
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## Submitting additional information

You can submit your additional information to the following email address:

[IntegrationStrategy@communities.gsi.gov.uk](mailto:IntegrationStrategy@communities.gsi.gov.uk).

You may wish to compress your document into a zip file before sending, or consider using a file transfer link if it is a large document.

If you send your additional information via email, please make sure the subject says "Consultation response: additional information from [insert your name/organisation]".

## **Personal data**

The data protection legislation is changing and a new Data Protection Act will come into force in May 2018. It will give you greater powers to protect your own privacy, and place greater responsibility on those processing your data for any purpose. The following is to explain your rights and give you the information you will be entitled to under the new Act.

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

### **1. The identity of the data controller and contact details of our Data Protection Officer**

The Ministry of Housing, Communities and Local Government (MHCLG) is the data controller. The Data Protection Officer can be contacted at [dataprotection@communities.gsi.gov.uk](mailto:dataprotection@communities.gsi.gov.uk)

### **2. Why we are collecting your personal data**

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

### **3. Our legal basis for processing your personal data**

Part 2 of the draft Data Protection Bill (subject to change before it becomes an Act) states that, as a government department, MHCLG may process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

### **4. With whom we will be sharing your personal data**

Responses submitted using this template will be stored securely on the Ministry of Housing, Communities and Local Government's secure IT system.

### **5. For how long we will keep your personal data, or criteria used to determine the retention period.**

Please refer to the records retention policy on our website.

<https://www.gov.uk/government/publications/departmental-records-retention-and-disposals-policy>

### **6. Your rights, e.g. access, rectification, erasure**

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a. to see what data we have about you
- b. to ask us to stop using your data, but keep it on record



- c. to have all or some of your data deleted or corrected
- d. to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

**7. Your personal data will not be used for any automated decision making.**