**New Plan For Immigration – NACCOM response to Home Office consultation**

29.04.2021

**Introduction**

Below is NACCOM’s response to the consultation on the New Plan for Immigration, laid out in the order that questions appear on the [Stakeholder questionnaire](https://ilpa.org.uk/wp-content/uploads/2021/03/New-Plan-for-Immigration-Stakeholder-Questionnaire.pdf). A decision was made not to answer the multiple-choice questions because it was not possible to make clear the nuance of the issues in the responses available. Any views about the questions are made in the relevant open text sections. The only exception to this is the first question, to which NACCOM has responded ‘strongly opposed’.

**NACCOM Response to the consultation**

**Question 1**. *The foreword provides a high level outline of the New Plan for Immigration, including reforms to make the system fair, but firm. Overall, how far do you support or oppose what is being said here?*

NACCOM will respond to say ‘Strongly oppose’.

**Question 2** is multiple choice so we are not responding

**Question 3.** *This question relates to the Overview of the Current System in the New Plan for Immigration, should you wish to refer to this before answering. Please use the space below to give further detail for your answer. In particular, if there are any other objectives that the Government should consider as part of their plans to reform the asylum and illegal migration systems.*

The NACCOM network is extremely concerned by, and strongly opposed to, plans outlined in the New Plan for Immigration and the objectives and vision outlined in Chapter 1.

The immigration system can, and should urgently, be improved. Any Government policy that forces people into homelessness, starvation, injustice, exploitation, and exclusion from all mainstream elements of society must be rethought completely. But in the process, NACCOM believes the Government should consider the following questions:

* What safeguards are in place to ensure that people’s health, safety and wellbeing are protected at all stages of the asylum process? Can people be assured that the UK protection system does indeed protect and not cause further harm?
* What processes are in place to ensure that the Home Office officials and ministers are listening to and responding to the concerns of people going through the immigration system? Are people included and respected, or are they going to continue to be excluded and marginalised?

NACCOM does not see anything in these proposals that recognises people’s dignity or ensures their safety and wellbeing. This must be remedied; indeed, NACCOM believes the Government should urgently remove all proposals for future legislation that could create destitution, prevent justice, and hamper people from living healthy and fulfilling lives in their local communities.

The NACCOM network is a wealth of evidence showing that communities across the UK have the energy and space to find solutions to destitution and have stepped up to fulfil this when Government has failed. In 2019-20, [3,373 people were accommodated by the NACCOM network, 2,794 of whom either had No Recourse to Public Funds (NRPF) (including people who have claimed or been refused asylum) or refugee status.](https://naccom.org.uk/wp-content/uploads/2021/02/NACCOM-ImpactReport_2021-02-04_DIGITAL-updated-Feb-2021.pdf) The harm that destitution causes to people who have nowhere to turn at the end of the immigration system has been well documented.[[1]](#footnote-2) The New Plan for Immigration is an opportunity for ministers and officials to show moral leadership by learning from past injustices and recognising the harm they have caused. But without guaranteeing people’s safety and wellbeing and without demonstrating how they are listening to and really understanding the impact of the system on the people within it, there is little hope that things will change for the better.

**Questions 4- 6** are multiple choice so we are not responding

**Question 7.** *Please use the space below to give further feedback on the proposals in chapter 2. In particular, the Government is keen to understand:*

*(a) If there are any ways in which these proposals could be improved to make sure the objective of providing well maintained and defined safe and legal routes for refugees in genuine need of protection is achieved; and*

*(b) Whether there are any potential challenges that you can foresee in the approach the Government is taking to help those in genuine need of protection.*

*Please provide as much detail as you can.*

There are some important principles in Chapter 2 of the New Plan for Immigration that need further attention:

**On the principle of ‘helping people in genuine need of protection’ - and the subsequent creation of a two-tier system of support**

NACCOM supports the right to seek asylum in the UK. This is a precious right that the UK has upheld, under international law, for 70 years. A person’s right to claim asylum is not conditional on the route they take to enter the UK and no government action should undermine or erode this right.

People must be able to claim asylum directly in the UK, be respected and supported during this process, and receive a secure, long term status that enables them to settle and support themselves and their loved ones in local communities. A protection system that fails to enable this, and instead leaves some people without the necessities to stay safe, warm, dry, and clean, is not fit for purpose.

**On the principle of refugee integration support**

NACCOM welcomes the Government’s acceptance that more can and should be done to support people when they have their leave to remain recognised. However, there are two main concerns with the proposals.

1) ‘Integration support’ should focus on people’s health, safety and wellbeing as a first principle and it is not clear how the plans will do this by focusing on employment support. The current system leaves people destitute after getting notice of their positive asylum decision because they only have 28 days to move on from asylum support. Sam, an expert by experience who gave evidence at the Housing, Communities and Local Government (HCLG) Select Committee [in December 2020](https://committees.parliament.uk/oralevidence/1429/pdf/), explains;

*‘I am a newly recognised refugee…I am at risk of homelessness in 18 days, because I am being evicted from asylum accommodation… I have been in touch with the local council. I made a homeless application. There is a delay in service due to the pandemic…. I applied for Universal Credit three weeks ago. I still do not have an appointment... As an asylum seeker, I was not allowed to work. I do not have savings. By the time you open a bank account and get Universal Credit, to try to find alternative accommodation is really difficult. I should be celebrating the fact that* I have my leave *to remain. I have been looking for a job; I have been doing job interviews. I should be focusing on that instead of doing homeless applications... This has been a problem with the 28 days’.*

Concerns about people’s experiences after the move on period have been well evidenced over the years but so far the Government has failed to act.[[2]](#footnote-3) NACCOM strongly urges the Government to listen to the views of people who have been through the UK asylum system as part of any development of an integration support package. Furthermore, NACCOM maintains its policy position that the move on period should be extended to 56 days to prevent destitution, and supports the publication of a full evaluation of the Positive Move On Support service to better understand its impact and to identify how services and partnerships could work more effectively in the future.

2) The steps outlined in Chapter 2 to improve integration for people with a recognised protection status sit directly at odds with plans outlined elsewhere in the New Plan for Immigration; namely the plans in Chapter 4 to introduce a new ‘temporary protection status’ for some people who cannot leave the UK. If it is serious about promoting thriving local communities and preventing street homelessness, the Government cannot commit to integration support for certain groups and not others. If people are to be assured that the UK protection system does indeed protect and not cause further harm more must be done to ensure safeguards around health, safety and wellbeing are threaded through all its policies and practices.

**Questions 8-9** are multiple choice so we are not responding

**Questions 10-14** are questions on specific areas of policy that are not within NACCOM’s remit so we are not responding.

**Questions 15-17** are multiple choice so we are not responding

**Question 18.** *Please use the space below to give further feedback on the proposals in chapter 3. The Government is keen to understand:*

*(a) If there are any ways in which these proposals could be improved to make sure the objective of correcting historic anomalies in our nationality laws is achieved; and*

*(b) Whether there are any potential challenges that you can foresee in the approach being taken to reform nationality laws.*

*Please provide as much detail as you can.*

NACCOM welcomes the intention of Chapter 3 to ‘deliver fairness in British Nationality Law’ but believes that without a wholesale change in the Government’s approach towards people seeking to secure their immigration status (in other words, an end to the Hostile Environment), people will continue to suffer racism, injustice and unequal treatment.

NACCOM members regularly work with adults and young people who are destitute because they were unable to access their right to registration due to cost or guardian error. It is not just or fair for people with a right to British citizenship to be forced in destitution and at risk of removal simply because of financial and practical barriers, such as a lack of understanding about how to make claim for nationality.

NACCOM believes that fairness can only be achieved if the Government commits to listening to the concerns of people who have direct experience of the immigration system in a meaningful way and introducing policies that safeguard everyone’s health, safety and wellbeing and ensure access to justice.

**Questions 19-20** are multiple choice so we are not responding

**Question 21.** *These questions relate to chapter 4 of the New Plan for Immigration. Please refer to this chapter for more information.*

*The UK Government intends to create a differentiated approach to asylum claims. For the first time how somebody arrives in the UK will matter for the purposes of their asylum claim.*

*As the Government seeks to implement this change, what, if any, practical considerations should be taken into account?*

A person’s right to claim asylum is not conditional on the route they take to enter the UK. People must be able to claim asylum directly in the UK, be respected and supported during this process, and receive a secure, long term status that enables them to settle and support themselves and their loved ones in local communities. A protection system that fails to enable this, and instead leaves some people without the necessities to stay safe, warm, dry, and clean, is not fit for purpose.

The proposals to introduce a ‘differentiated’ approach are extremely concerning and must be scrapped. Plans to offer ‘temporary protection’ to some people who arrive in the UK are a clear example of how government policy can willfully increase destitution and actively prevent people from moving on with their lives- and sits in direct opposition to the Government’s alleged intentions to improve integration support for people with status. People eligible for this new type of status will have been recognised as in need of protection yet their lives will remain in limbo. By being forced to continuously reapply for expensive temporary leave to remain, people will struggle to access the affordable, long term accommodation that is vital to access the meaningful education, employment and training opportunities that prevent destitution.

Likewise, NACCOM is extremely concerned by plans to extend controls over where people live while their claims are processed. The UK Government has an extremely poor track record over recent years with accommodation standards and [the use of former Ministry of Defense sites and hotels](https://asylummatters.org/wp-content/uploads/sites/117/2021/03/Joint-Briefing-on-Asylum-Accommodation-March-2021-1.pdf) has shown the damage caused by institutional accommodation. NACCOM calls for a Government commitment to support people to live healthy and fulfilling lives in local communities, by providing safe, high quality accommodation in areas where legal advice, community support and healthcare services are all readily available.

**Question 22.** *The UK Government intends on introducing a more rigorous standard for testing the “well-founded fear of persecution” in the Refugee Convention. As the Government considers this change, what, if any, practical considerations should be taken into account?*

NACCOM is extremely concerned by the proposal in Chapter 4 to change the standard of proof for evidencing a claim for protection and sees this as a fundamental attack on the right to seek asylum. There is no good reason to make the process more rigorous and this proposal should be scrapped.

The high rate of asylum appeals that are allowed (39% as of December 2020) show that the Government should review decision-making processes at the Home Office, which have been long showed to be woefully inadequate. The Home Office must take responsibility for improving the process but this should be rooted in an ambition to improve decisions made, not to create more obstacles to justice.

**Questions 23-24** are multiple choice so we are not responding

**Question 25.** *Please use the space below to give further feedback on the proposals in chapter 4. In particular, the Government is keen to understand:*

*(a) If there are any ways in which these proposals could be improved to make sure the objective of overhauling our domestic asylum framework is achieved; and*

*(b) Whether there are any potential challenges that you can foresee in the approach being taken around asylum reform.*

*Please provide as much detail as you can.*

NACCOM is extremely concerned by the proposals in Chapter 4 and believe the policy proposals should be scrapped because they fail to protect people’s health, safety and wellbeing and serve only to extend the Hostile Environment.

There are lots of ways in which the asylum system can and should be improved but those listed in this chapter are not the appropriate routes to reform. Plans to process asylum claims outside of the UK, revoke someone’s leave to remain if they commit an offence, set a new standard for testing protection needs and focus on age assessments for vulnerable young people safeguarding against adults claiming to be children are amongst the policies that have been chosen, we believe, to scapegoat certain groups, further a toxic narrative, and entrench inequality and exclusion.

The government has an opportunity to support people to live healthy and fulfilling lives in local communities from the very beginning of the asylum process, in a way that benefits everyone. NACCOM urges the UK Government to listen to those directly impacted by the current system who have had their lives left in limbo due to poor decision making, delays with accessing support and poor-quality accommodation and commit to making changes that protect people and do not do further harm.

**Questions 26-28** are multiple choice so we are not responding

**Question 29.** *The Government propose an amended ‘one-stop process’ for all protection claimants. This means supporting individuals to present all protection-related issues at the start of the process. The objective of this process is to avoid sequential and last-minute claims being made, resulting in quicker and more effective decision making for claimants*. *Are there other measures not set out in the proposals for a ‘one-stop process’ that the Government could take to speed up the immigration and asylum appeals process, while upholding access to justice? Please give data (where applicable) and detailed reasons.*

The proposal to introduce a ‘one stop process’ is extremely concerning because it does nothing to prevent destitution or provide adequate levels of justice and security for people within and at the end of the asylum system.

The UK immigration system should ensure a truly equitable and accessible process to uphold individual rights. It is well recognised that individuals, including many who are supported by NACCOM member organisations, are often unable to present their entire protection claim upfront. Reasons for this can include a fear of persecution and lack of trust of officials, experiences of trauma or violence (as demonstrated by a report from Freedom from Torture last year which found that torture survivors [leave asylum interviews feeling dehumanised and re-traumatised](https://www.freedomfromtorture.org/news/beyond-belief-our-new-report-reveals-a-home-office-culture-tainted-by-prejudice)) and the length of time that it can take to obtain certain pieces of evidence. Such problems are often further compounded by language and cultural barriers and a lack of access to good quality legal advice – [often caused by the lack of legal aid provision across the UK.](http://www.jowilding.org/assets/files/Droughts%20and%20Deserts%20final%20report.pdf)

In effect, a ‘one stop process’ would make it harder for some people, particularly those with complex cases or additional vulnerabilities, to receive fair treatment, and the consequence will be an increase in destitution at the end of the asylum process. At this point, people with lived experience testify that it is incredibly difficult to progress with a legal challenge or find fresh evidence for a new claim, due to having no guarantee of shelter and no way of staying warm and safe.

As Sam explained to the [HCLG committee in December 2020](https://committees.parliament.uk/oralevidence/1429/pdf/), *‘I was previously homeless. I was sofa-surfing for over a year, trying to find accommodation. I really struggled to access services due to no recourse to public funds, and I ended up sleep-deprived for weeks in a fast-food restaurant. This period was really scary and a difficult time for me, and I remember asking myself, “Will I ever feel safe?”’*

Abeo, who also gave evidence to the [HCLG Select Committee in December 2020](https://committees.parliament.uk/oralevidence/1429/pdf/), explains the personal impact of having NRPF with no immigration status, and the changes that are needed to ensure everyone feels safe; *“It is very hard to comply [with NRPF] when you are not allowed to work or claim benefits and it is against human rights. It is like the Government telling you, “Just sit on the street. You are not allowed to eat; you are not allowed to sleep in a house; just sit on the street and die”… If you are a human being, you should be able to access your basic needs like food, cleaning yourself and staying in accommodation until your immigration status is solved.”*

**Question 30.** *Please use the space below to give further feedback on the proposals in chapter 5. In particular, the Government is keen to understand:*

*(a) If there are any ways in which these proposals could be improved to make sure the asylum and appeals system is faster, fairer, and concludes cases more effectively;*

*(b) Whether there are any potential challenges that you can foresee in the approach the Government are taking around streamlining appeals.*

*Please provide as much detail as you can.*

NACCOM is extremely concerned by the proposals in Chapter 5 which largely focus on discrediting people seeking protection, whilst failing to acknowledge or rectify Home Office mistakes.

NACCOM’s network of over 135 local and community organisations support people who transition through the different statuses and processes of the immigration system. We see people who are forced into destitution by being refused asylum, refused recourse to public funds, refused alternative routes to legalise their status and refused their chance to rebuild a healthy, fulfilling life.

The system changes proposed will not make people safer or improve access to justice and so NACCOM believes the proposals should be abandoned. Specific concern are outlined below as the multiple choice questions in this section were not deemed appropriate for a full response:

In questions 26 and 27, we support the Government’s assertion that ‘*maintaining fairness, ensuring access to justice and upholding the rule of law’* is integral to a well-functioning asylum system, but believe the way these intentions have been framed alongside plans to ‘*reduce the extent to which people can frustrate removals through sequential or unmeritorious claims, appeals or legal action’* is contradictory and misleading.

The proposal in question 27 to provide ‘*more generous access to advice, including legal advice, to support people to raise issues, provide evidence as early as possible and avoid last minute claims’* is also confusing as it does not make clear whether such support would be independent. Any offer of legal advice must be qualified legal aid support.

**Question 31** is multiple choice so we are not responding.

**Question 32.** *These questions relate to chapter 6 of the New Plan for Immigration. Please refer to this chapter for more information.*

*Please use the space below to give further feedback on the proposals in chapter 6. In particular, the Government is keen to understand:*

*(a) If there are any ways in which these proposals could be improved to make sure the objective of building a resilient system which accurately identifies possible victims of modern slavery as quickly as possible and ensures that support is provided to genuine victims who need it is achieved; and*

*(b) Whether there are any potential challenges that you can foresee in the approach the Government are taking around modern slavery.*

*Please provide as much detail as you can.*

NACCOM represents a network of organisations many of whom support and accommodate people with NRPF, and this includes people who have been through the National Referral Mechanism only to face destitution on the other side. It is NACCOM’s assertion that destitution and modern slavery go hand in hand because when people find themselves destitute with no recourse to public funds, economic exploitation is often the only way to survive.

To this end, on Anti-Slavery day in October 2020, NACCOM [signed a joint letter to the Prime Minister](https://naccom.org.uk/anti-slavery-day-naccom-joins-with-50-experts-to-call-for-end-to-harms-facing-survivors/) which outlined how the UK’s emphasis on immigration control, at the expense of human dignity and safety, is threatening efforts to identify and support survivors of trafficking. In the letter, the signatories called for *‘a commitment to ensure that victims of trafficking do not face punitive immigration control measures if they come forward for support. Asylum applications must be considered on merit, in a framework that acknowledges that many who make asylum claims, including survivors of modern slavery, have no choice but to arrive spontaneously or claim asylum after having been in the UK for some time. First and foremost, any reform to our immigration system must seek to remedy, rather than entrench, the wrongs committed against survivors of modern slavery.’*

We stand by this recommendation in reading the proposals in Chapter 6 and urge the Government to do more to ensure the health, safety and wellbeing of everyone seeking protection.

**Questions 33-36** are multiple choice so we are not responding.

**Question 37**. *Please use the space below to give further feedback on the proposals in chapter 7. In particular, the Government is keen to understand:*

*(a) If there are any ways in which these proposals could be improved to make sure the objective of defending the UK border and preventing illegal entry is achieved; and*

*(b) Whether there are any potential challenges that you can foresee in the approach the Government are taking to defend the border.*

*Please provide as much detail as you can.*

We disagree with the framing of the proposals in Chapter 7 and believe the emphasis on criminality serves a political agenda to discredit protection claims and create a false dichotomy between different routes to seeking asylum. We believe that the Home Office should put their energy into improving the system for people who seek protection, so everyone has (to use the Home Office’s own language) safe and legal routes to settling and supporting themselves and their loved ones in the UK.

**Questions 38-40** are multiple choice so we are not responding.

**Question 41**. *Please use the space below to give further feedback on the proposals in chapter 8. In particular, the Government is keen to understand:*

*(a) If there are any ways in which these proposals could be improved to make sure the objective of enforcing and promoting compliance with immigration laws, ensuring the swift return of those not entitled to be in the UK is achieved; and*

*(b) Whether there are any potential challenges that you can foresee in the approach the Government is taking around removals.*

*Please write in your answer in full, providing as much detail as you can.*

NACCOM is extremely concerned by the proposals outlined in Chapter 8.

The proposal to enact changes from the 2016 Immigration Act and end support for people who have been refused asylum, including families, is of particular concern. People who have been refused asylum need time and support and they need legal advice and a roof over their head whilst they explore their options. The conflation of criminality and asylum refusals which runs throughout this chapter is misleading and seeks only to further a toxic narrative against people who are exercising their right to seek protection.

The suggestion of plans to stop support for asylum seeking families (Q.38) is of extreme concern. For too long, single adults have been subject to the ordeal of being forced to live in homelessness and extreme poverty, facing starvation and exploitation, if they do not ‘voluntarily’ leave the UK. For some people returning to their country of origin may be something they consider, but the reality is that for many people it is simply not safe nor practical for them to do so. Coercion into destitution solves no problems at all. It is reckless and irresponsible of the Home Office, not only to maintain this position with single adults but to extend it to families and children as well.

With support people can and do move on with the immigration claims. [NRPF Network data shows that with legal advice and support, 77% of families with NRPF who were supported by local authorities last year were granted leave to remain.](https://www.nrpfnetwork.org.uk/news/nrpf-connect-data-report-2019-20) Meanwhile, of the 427 people who were appeal rights exhausted and moved on from [NACCOM members services in 2019/20, 53% secured refugee protection or were supported to re-engaged with statutory or asylum support.](https://naccom.org.uk/wp-content/uploads/2021/02/NACCOM-ImpactReport_2021-02-04_DIGITAL-updated-Feb-2021.pdf)

The proposal of a time limit on seeking legal advice (Q.40) for people facing removal is also of concern, as it is drafted in such a way to prevent people from accessing justice and challenging Home Office decisions. Access to independent legal advice is essential if justice and fairness are to be maintained, but NACCOM are aware that it is extremely difficult to access independent legal advice within detention/IRCs and know there are many barriers to good quality legal advice more widely. The Home Office should take a leadership role in working with other government departments to ensure no one faces a barrier to justice.

**Questions 42-43** are multiple choice so we will not be responding.

**Question 44.** *Thinking about any potential equality considerations for the intended reforms in each of the areas, are there any mitigations you feel the Government should consider? Please give data (where applicable) and detailed reasons*.

NACCOM is extremely concerned about the implications of the proposals on all people seeking protection, including people with protected characteristics. Everyone should be able to trust in an immigration system that protects, and does not harm, those who need it. Instead, Government ministers have continued a narrative to divide people into more or less deserving groups, with the assumption being that those who are ‘less’ deserving of protection might (in some cases) confer no recognition or rights at all.

NACCOM are profoundly disappointed that the racial injustice and destitution by design which is built into the Hostile Environment remains unchallenged in these proposals. This as a reflection of a culture within the Home Office that fails to listen and learn. Likewise, we are deeply concerned by the lack of gendered approach and the failure by the Home Office to acknowledge additional barriers that people with protected characteristics might face when evidencing their protection needs.

Whilst NACCOM recognise the specific intersectional risks facing people within recognised protected characteristics, we would like to see the Home Office publish all their Equality Duty assessments around policies past, present and future, as an important step towards transparency and equality. We believe the Home Office should safeguard against destitution in all its forms across all its policies.

**Question 45**. *Is there any other feedback on the New Plan for Immigration content that you would like to submit as part of this consultation?*

NACCOM is deeply concerned about the consultation process around the New Plan For Immigrationand the consequences of the legislation that could emerge from it.

The shared vision that our network holds, which is to see an end to destitution, is central to these concerns. NACCOM rejects the premise of the stated vision and key objectives in the New Plan for Immigration on the basis that the changes will clearly worsen the safety, health, wellbeing and future prospects of people seeking protection in the UK, including those who are already here and those who are yet to arrive.

As a network of over 135 organisations representing and supporting people whose lives have been directly and disastrously impacted by decades of hostile immigration legislation, NACCOM’s response focuses in the most part on the impact of existing and future Government policy on people who have been refused asylum (the core group of people accommodated by network members) and people who have had their refugee status recognised (the second largest group accommodated by network members). Beyond concerns that are raised regarding these two specific demographic groups, NACCOM wholeheartedly rejects all elements of the New Plan for Immigration that extend or entrench the Hostile Environment in all its forms.

Along with many other organisations, NACCOM is extremely concerned by the format and timeframe of the consultation, and as such NACCOM is engaging with the consultation but in a way that is openly and strongly critical of its intentions and limitations. It is NACCOM’s belief that the expertise of people with lived experience of the immigration system has not been heard in a sufficient or meaningful way by the Government in this consultation process and it is NACCOM’s assertion that the process is significantly poorer for it. There is also a concern with the way that many of the questions are framed, which is in such a way that they do not allow for disagreement with the plan’s central vision. In these instances, NACCOM has made the decision not to respond; we do not want to imply agreement with the overall premise. Finally, there are concerns about the timeframe for the consultation period, which is extremely short and during Local Authority elections, which will no doubt hamper some of the opportunities for robust responses.

NACCOM believes that the authors of the New Plan for Immigration have done nothing to truly address the failures of the UK’s immigration system, or to avoid new inequalities in the future. As a minimum, the Government should ensure that people’s human rights are upheld and lives are kept safe through the immigration system and beyond – so that everyone can live a healthy and fulfilling life, wherever they call home. Inequality, indignity, poverty and hardship do not have to be the hallmarks of the process. This is clear to NACCOM from our 10,000 person-strong network working in partnership to deliver accommodation, legal and support services in innovative ways, and our connection with people with lived experience of destitution in local communities, who together create change, challenge inequality and rebuild lives. NACCOM stands with people who have faced injustice, hardship and homelessness because of the Hostile Environment and reject this plan; instead we demand a more inclusive and informed way forward.

1. For recent reports and briefings, see [‘Being Human’](https://www.jrsuk.net/wp-content/uploads/2021/04/Being-Human-in-the-Asylum-System_JRS-UK_April-2021.pdf), Jesuit Refugee Service UK, 2021, [‘Hear Us’](https://dfbbceaf-7cbc-4bfa-8f79-6a8a879c2c25.filesusr.com/ugd/d37102_3eb3a41885e24e648f049a972e7e3335.pdf), Sisters Not Strangers, 2020, [‘Will I Ever Be Safe?’](https://www.refugeewomen.co.uk/not-safe/) Women for Refugee Women and partners, 2020, ‘[Missing the Safety Net](https://naccom.org.uk/wp-content/uploads/2019/09/Missing-the-Safety-Net-report-FINAL-September-5th-2019.pdf)’, Refugee Action and NACCOM, 2019, [‘Seeking Asylum’](https://naccom.org.uk/wp-content/uploads/2019/02/Report-Baobab.pdf), Baobab, CARAG, Coventry Migrant Women’s House, Meena, Refugee Rights Europe and Hope Projects, 2019, [↑](#footnote-ref-2)
2. See Home Affairs Select Committee (2020) [Home Office preparedness for Covid-19: Institutional accommodation](https://committees.parliament.uk/publications/2171/documents/20132/default/), British Red Cross (2020) [The costs of destitution: A cost-benefit analysis of extending the move-on period for new refugees](https://www.redcross.org.uk/-/media/documents/about-us/research-publications/refugee-support/the-costs-of-destitution.pdf?la=en&hash=DB934CFE514C3B732C80E8EDF2FBC08DD746F42C), Asylum Matters and Refugee Action (2020) [Wake Up Call](https://asylummatters.org/wp-content/uploads/sites/117/2020/07/Wake-Up-Call-Report_July-2020_final.pdf), Post Grant Appointment Service Evaluation (2019) [PGAS Evaluation](https://www.parliament.uk/documents/commons-committees/work-and-pensions/Correspondence/190603-PGAS-report.pdf), NACCOM (2019) [Mind the Gap One Year On](https://naccom.org.uk/wp-content/uploads/2019/06/NACCOM-Homelessnesss-Report_2019-06-18_DIGITAL.pdf), APPG on Ending Homelessness (2018) [Rapidly Responding to Homelessness - a look at migrant homelessness, youth homelessness and rapid rehousing models](https://www.crisis.org.uk/media/242248/appg-for-ending-homelessness-report_final_may2020.pdf), Crisis (2018) [Everybody In](https://www.crisis.org.uk/media/239951/everybody_in_how_to_end_homelessness_in_great_britain_2018.pdf), NACCOM (2018) [Mind the Gap](https://naccom.org.uk/wp-content/uploads/2018/10/NACCOM-Homelessnesss-Report_2018-10-24.pdf)

   British Red Cross (2018) [Still an ordeal: The move-on period for new refugees](https://www.redcross.org.uk/-/media/documents/about-us/research-publications/refugee-support/still-an-ordeal-move-on-period-report.pdf), Refugee Council (2017) [Refugees without Refuge](https://www.refugeecouncil.org.uk/wp-content/uploads/2019/03/Refugees_without_refuge_September_2017.pdf), Home Affairs Select Committee (2017) [Asylum Accommodation Inquiry](https://publications.parliament.uk/pa/cm201617/cmselect/cmhaff/637/63702.htm), APPG for Refugees (2017) [Refugees Welcome?](https://www.refugeecouncil.org.uk/wp-content/uploads/2019/03/APPG_on_Refugees_-_Refugees_Welcome_report.pdf), Refugee Council (2016) [England’s Forgotten Refugees](http://www.refugeecouncil.org.uk/wp-content/uploads/2019/03/England_s_Forgotten_Refugees_final.pdf) [↑](#footnote-ref-3)