



The Rt Hon Michael Gove MP, Secretary of State for Levelling Up, Housing & Communities
Department for Levelling Up, Housing & Communities
2 Marsham Street
London
SW1P 4DP

22nd April 2022,

Dear Secretary of State,

Today we are writing to you as 16 organisations to express our ongoing concerns about aspects of the Homes for Ukraine scheme that we believe undermine the protection and sanctuary this country seeks to offer Ukrainian refugees.

For many years, members of the No Accommodation Network (NACCOM) have been operating hosting schemes that enable people within the asylum and immigration system to find the safety and stability they need to move on from homelessness and destitution and rebuild their lives.

Our experience tells us that for hosting to provide an effective pathway to safety, the right safeguarding procedures, in-placement support, and move-on support must be in place. A hosting arrangement will only be positive for all involved if the right time and consideration has been given to these pillars, particularly as many people in need of hosting may have experienced trauma, conflict, or persecution.

We appreciate the challenges of setting up a UK-wide hosting scheme at pace. Nonetheless, we believe that the following support and safeguarding needs must be addressed urgently to avoid significant risks to these efforts, and harm to the individuals involved.

Matching

We are concerned that currently anyone in the UK or elsewhere can directly match with refugees or set up a matching site and be responsible for identifying hosts for refugees to pair with. We welcome the Government's decision to endorse the matching service developed by Reset Communities and Refugees as a step in the right direction. However, in the absence of wider regulation, we are already seeing reports of unscrupulous individuals using alternative matching sites and social media to exploit Ukrainian refugees, on top of information from local authorities that unaccompanied minors have been registered on the Homes for Ukraine scheme via unregulated matching services.

In response to the above, we urge the Government:

- To regulate Homes for Ukraine matching services and take immediate steps to monitor and close all suspicious matching sites.

Safeguarding

We believe more stringent steps should be taken to strengthen safeguarding measures in the implementation of the Homes for Ukraine scheme. All NACCOM hosting projects have a clear and robust approach to safeguarding and risk assessments, including the vetting of both guests and hosts and established reporting procedures. Whilst we are pleased that Reset is looking to build in an assessment service as part of its matching service, concerns remain for matches made outside of this platform. We are also concerned about the disconnect between the matching and hosting aspects of the scheme. Councils are required to undertake accommodation and DBS criminal record checks but are currently not obligated to do so prior to the arrival of guests. We are concerned that this leaves a window of opportunity for exploitation.

In response to the above, we urge the Government:

- To work with Councils to ensure that pre-arrival checks are carried out as a matter of necessity, which will include the requirement that Councils have timely information about matches made in their area.
- To ensure there is clear guidance and support for Councils to deal with a match that does not pass its pre-arrival or in-placement safeguarding checks and ensure that Ukrainian refugees are supported into alternative safe, temporary accommodation.
- To issue clear guidance to participating charities and organisations in the instance that the second phase of the Homes for Ukraine scheme is rolled out to ensure that they have a clear and robust approach to safeguarding and risk assessments.

In-placement support for guests

As hosting experts, we believe that having a trauma-informed approach to support is important to ensure a safe and successful hosting arrangement. It is vital to recognise that many refugees arriving from Ukraine will be traumatised and are likely to require counselling and other mental health support. Councils have been advised, where necessary, to provide advice and referrals to specialist public health services and some have already started working in partnership with civil society organisations to deliver in-placement support. However, we remain concerned about the capacity and ability of local authorities to ensure that everyone who needs support will be able to access it, especially as mental health provisions are not covered in the local authority wrap-around support funding.

In response to the above, we urge the Government:

- To ensure that Councils have sufficient resources and support to enable them to onboard at pace suitably qualified people to provide adequate in-placement support to guests or work formally in partnership with local organisations with experience of doing this work.
- To ensure that each person coming through Homes for Ukraine receives the offer of an initial health check and assistance to register with a GP.
- To ensure that Councils have sufficient resources and support to meet local demand for specialist health support.
- To clarify that, in the instance of a breakdown in placement, Ukrainians will not be at a disadvantage if they must move out of the area that their original sponsor resides in, with wrap-around support funding following the individual.

In-placement support for hosts

We are concerned over the lack of training and support currently in place to support sponsors receiving vulnerable people into their homes. Access to support and training for hosts is a necessary ingredient for a trauma-informed approach to hosting and helps to ensure that hosts do not retraumatise their guests or become vicariously traumatised through the act of hosting.

Nonetheless, one-off training does not necessarily ensure that a host is fully equipped, and it is important that on-going support is in place too. Good hosting schemes typically offer full training to hosts and will support hosts by providing a Host Co-ordinator/Host Support Worker. Both elements reduce the risk of, at best, a breakdown in relationship between host and guest and, at worst, exploitation and harm.

In response to the above, we urge Government:

- To ensure that all participating hosts undergo training or an induction before starting their placement.
- To ensure that Councils have sufficient resources and support to onboard at pace suitably qualified people to provide adequate in-placement support to hosts or work formally in partnership with local organisations with experience of doing this work.

Move-on support for guests

Whilst established hosting projects typically have a clear move-on plan for guests, there remains some uncertainty about the move-on support available in the Homes for Ukraine scheme. It is usually the Guest Support Worker or Host Co-ordinator who ensures that a move-on plan is in place and worked towards during the arrangement. This enables guests to successfully leave the hosting arrangement to settle independently in the community or, where appropriate, claim asylum.

The lack of clarity around move-on support available to guests is problematic considering the possibility that a placement may break-down prematurely, putting individuals at risk of homelessness. Although hosts have a duty to accommodate refugees for six months, we have already seen evidence of scheme participants applying for statutory homelessness support. In the absence of sufficient move-on support, we are concerned about the burden that the scheme could place on local authorities, especially if new housing is required.

In response to the above, we urge Government:

- To develop a clear move-on pathway for guests before the end of the placement, enabling guests to access relevant housing options, and if appropriate, lodge an asylum claim.
- To conduct a mapping exercise to understand the housing options for expected need. This should include guidance developed in partnership with the refugee sector, Ukrainian community groups and Councils, with an agreed set of protocols tailored to the local context.

Reforming the asylum system

Finally, we believe that for the Government to honour its commitment under international law to offer refugee protection to those who need it, the establishment of long-term routes to permanent resettlement is vital to ensure that people have urgent and accessible pathways to safety that can be deployed at pace.

Whilst we appreciate the need to set up the Homes for Ukraine scheme at pace, there is currently tension and trade-off between the urgent need to provide shelter to Ukrainians seeking refuge in the UK, and the need to ensure that adequate support and checks are in place to deliver a good quality and safe hosting scheme.

We do not believe that the Government should be prioritising the number of refugees over their safety, nor that it should be a choice between the two. For the compassionate, safe, and effective roll-out of Homes for Ukraine, it is vital that visas are scrapped, and that hosting is understood to be a unique and distinct type of accommodation provision that works best within a structured, holistic refugee resettlement pathway. This itself must be underpinned by a fair and just asylum system.

In response to the above, we urge Government:

- To commit to a refugee resettlement programme supporting at least 10,000 people each year, that would work alongside Community Sponsorship and hosting projects, whilst still fulfilling the Government's commitment to the International Refugee Convention.
- To work with statutory agencies, the voluntary sector, local communities, people seeking asylum and refugees in this country to design a system that is fair, just, proportionate, and operationally sound.
- To create legislation that will address the challenges of the immigration and asylum system without punishing people seeking safety in the UK.

Closing remarks

Our experience tells us that hosting works best when the right time, support and consideration has been given to facilitating a positive and safe hosting placement.

At this early stage, we believe that improvements can still be made to the Homes for Ukraine scheme by building on the advice and tested solutions of those organisations in the NACCOM network with a wealth of experience in delivering hosting schemes.

With the current lack of clarity surrounding the scheme's safeguarding procedures, in-placement support, and move-on support available, we are concerned about the negative and potentially harmful outcomes that the current scheme could have for both guests and hosts.

As it stands, there is a risk that the Homes for Ukraine scheme will continue to fall short of the expectations of the public, who have been generous and compassionate in their response towards refugees from Ukraine by opening their homes to them. There is also a risk that negative outcomes of the Homes for Ukraine scheme could undermine the important role that hosting can play in providing safe homes and urgent protection and stability to those fleeing persecution, trauma, and conflict.

Yours faithfully,

Katie Auker, Chief Executive, *Destitute Asylum Seekers Huddersfield (DASH)*

Stanford Biti, Chief Executive, *Communities and Sanctuary-Seekers Together (CAST)*

Becky Hellewell, Head of Support & Immigration, *St. Augustine's Centre*

Helen Hodgson, Operations Director, *Hope at Home*

Ros Holland, Chief Executive, *Boaz Trust*

Andrew Jackson, Chief Executive, *Upbeat Communities*

Sarah Jemison, Chair of Trustees, *BEACON (Bradford Ecumenical Asylum Concern)*

Rebecca Kogan, Project Coordinator, *Host Nottingham*

Nicolle Levine, Chair, *Leeds Asylum Seekers' Support Network*
Tess McCay, Director, *Sanctuary Hosting*
Graham Millar, Executive Director, *ASSIST Sheffield*
Jenna Roberts, Hosting Project Manager, *Housing Justice*
Lauren Scott, Executive Director, *Refugees at Home*
Sarah Teather, Director, *Jesuit Refugee Service UK (JRS UK)*
Romy Wood, Hosting Programme Coordinator, *Housing Justice Cymru*
Bridget Young, Director, *No Accommodation Network (NACCOM)*

CC Lord Richard Harrington, Minister of State (Minister for Refugees)