

Comments on the Home Office consultation document, *Integration Matters: A National Strategy for Refugee Integration*

REFUGEE ACTION'S RESPONSE

September 2004

Refugee Action exists to enable refugees to build new lives, through providing advice and information, developing communities, enhancing opportunity, and campaigning for refugee rights.

We welcome this strategy and acknowledge the progress made since the launch of *Full and Equal Citizens*. The following specific comments, on the different sections of the strategy, are based on our experiences of working with refugees and asylum seekers from different nationalities in the different regions in England.

Section 3: Mobilising our resources

- **Emphasis on Regional Consortia**

We are concerned about the emphasis placed on the Regional Consortia for regional planning. Because Regional Consortia were initially set up to deliver services for new arrivals with particular focus on immediate and contractual services, we would question whether, in their current state, these same bodies would be effective in delivering long-term integration services that require a more co-ordinated and partnership-based approach.

In our experience it has been difficult for some (though not all) consortia to form coherent decision making bodies, able to run or commission services. There are three main reasons for this:

- 1) The geographical area which the Consortia cover is often vast
- 2) The Consortia themselves have often felt under resourced to achieve their aims
- 3) The local authorities involved have been unable to overcome political or historical differences, or differences of opinion over methods of service delivery.

We would therefore recommend that planning and delivery is also supported, resourced and focused at a sub-regional level, where appropriate, with groups of local authorities and other stakeholders who have a track record and willingness to work together.

Suggestion: As Consortia are moving towards Integration issues, we would urge that the Consortia are encouraged to ensure that they involve more representation from Refugee and Voluntary sector groups. To date, such involvement has been limited because Consortia have been occupied with considering NASS and 'in-house' related issues such as dispersal contracts and statutory service provision.

Section 5: Delivering new solutions

- **Local connection**

While we welcome measures that provide local connections that could facilitate integration of refugees, we feel concerned about the imposition of a 'local connection' on people who have been dispersed to an area on a no-choice basis. This might hinder rather than assist the integration of refugees. In our experience, people move away from their dispersal areas for a variety of reasons, not only because of local connections of family or employment. They also move to other areas because of connections with friends and communities, or because of an awareness of existing support structures and services; all issues that assist integration. However, under this proposed legislation, people would be unable to move to areas with these benefits to integration, as, although they are beneficial, none of these issues are sufficient to establish a local connection.

We are also concerned that, over time, this legislation will lead to a build up of people being supported by mainstream benefits in the North of the UK (where most people are dispersed), who are unable to find work or access services which may assist them in doing so. While there are obviously work opportunities and some appropriate services in dispersal areas (though it is the case that there are still more work opportunities in the South of the UK than in the North), we are concerned that the build up of people who have to stay in their dispersal area will mean that individuals, over time, will find it increasingly difficult to access either.

- **The SUNRISE programme**

We welcome the introduction of this programme. However, we would note the following:

- 1) **28 day intensive support and planning**

In the experience of our asylum advice staff, many of our clients face a period of great uncertainty (and often destitution) when first transferring from NASS to mainstream support. This is because it often takes some time (2-3 weeks) to get an appointment with Jobcentre Plus, and around 4-8 weeks (i.e. longer than 28

days) to actually receive benefits. While people are going through this difficult and uncertain process it is clearly difficult for them to consider more long-term integration issues like ESOL, volunteering or employment.

Suggestion: We would therefore urge that the initial period of intensive support and planning is not restricted to 28 days. Probably the programme should be defined in terms of the resources or number of hours people may be entitled to when they receive refugee status, and the timescale during which support is made available should be flexible and tailored to refugees' individual circumstances.

2) Using the One Stop Shop Service for the SUNRISE programme

The Voluntary Sector provided 'One Stop Services,' (OSS) funded by the Home Office, already have significant emphasis on providing 'move on' support in the time immediately after a positive asylum (or other form of protection) decision. While resources do not currently allow the more structured, intense approach of SUNRISE, much of the advice, advocacy and service development required by the programme are already being carried out by the OSS.

Suggestion: In order to maximise efficiency and build on, rather than duplicate, existing work, we would therefore strongly urge that the Home Office develops the SUNRISE programme as an enhancement to the role of the OSS. If this is not initially possible, we would urge that two pilots are implemented - one as planned, and one linked to a OSS, so that the costs and benefits of both approaches can be properly compared.

▪ Refugee Integration Loan

While we support the introduction of a Refugee Integration Loan, we would question the appropriateness of withdrawing back-payment of income support. While we recognise that the amount of back-payment is dependant on the time that people spend waiting for a decision, we believe that this is merely a reflection of the time that asylum seekers have spent unable to access the basic level of support given to every other individual in the UK who is unable to work. In the experience of staff working with asylum seekers, this back payment is often used to pay off personal debts that people have accrued in surviving their time as an asylum seeker, and so very rarely used to further people's integration.

Suggestion: We would therefore urge that the Refugee Integration Loan is implemented, but not at the expense of the back payments of income support.

Co-ordination and implementation of the strategy

We are concerned that it is considered that NASS support is defined as 'provide[ing] a structured and supported environment with ready access to advice and services.' (in the section on 'defining the challenge'). While there have been significant improvements in the administration and quality of NASS support over the last four years, it is still the case that many people are living in isolation from their host communities with little or no understanding of mainstream voluntary or statutory

service provision and unable to access, for example, ESOL classes. While we welcome the observation that Accommodation Centres will present an opportunity to “provide a head start in the integration of residents who gain refugee status’, we would urge that consideration is also given to providing this head start to people in dispersal accommodation. We would note that, even when accommodation centres are up and running, it is likely that 90% of supported asylum seekers will still be housed in dispersal accommodation. As with the SUNRISE programme, we would urge the use of the existing network of OSS across the country as an ideal platform for providing integration focused support to these people.