



Refugee Action – response to Integrated Communities Strategy Green Paper, June 2018

Contents

1. Executive Summary
2. Introduction
3. English for Speakers of Other Languages (ESOL)
 - 3.1 Our experience
 - 3.2 Our research
 - 3.3 Others' experience
 - 3.4 Government response so far
 - 3.5 A snapshot from Refugee Action's services
 - 3.6 Our view of the Government's proposals
4. Refugee Integration
 - 4.1 Employment
 - 4.2 State benefits
 - 4.3 Resettlement
 - 4.4 Integration support during and after the asylum process
 - 4.5 Family reunion
 - 4.6 Social integration
 - 4.7 A focus on the local
 - 4.8 Measuring integration
5. Conclusions and recommendations
6. References

1. Executive Summary

Refugee Action welcomes the Government's publication of its proposals within the Integrated Communities Strategy Green Paper, and the opportunity to respond to it.

Our response will focus on two themes within the Green Paper which most directly relate to our work - English for Speakers of Other Languages (ESOL) and refugee integration.

ESOL

Every day we work with refugees who are determined to learn English. In theory, they are eligible for fully-funded provision; but in practice, a real terms reduction of 60% in recent years to government funding for ESOL means refugees are waiting for months and often years to begin classes. Once they have commenced learning English, it's often for far too few hours a week or at an unsuitable teaching level; while refugee women frequently face additional delays and obstacles to learning.

Refugees are often able to access informal English teaching or practice, usually delivered by volunteers – this is an invaluable complement to, but not an adequate replacement for, formal learning.

These barriers to English language learning are forcing people to put their lives on hold and are delaying and preventing their integration.

The Government acknowledges the vital importance of English for integration; and the Green Paper contains some welcome proposals. These include developing an ESOL strategy for England; and a Centre for Excellence - or online hub – to support, improve and increase local community and faith groups' ability to provide volunteer-led English language support.

However, the Government's proposals contain no new funding for English language teaching. This is despite strong support - in parliament and among the public – and overwhelming evidence on the need for urgent action to increase English language provision; and the many benefits this provides to refugees, our economy and our communities.

We believe these proposals will not enable a single individual refugee to access a single additional hour of accredited, formal English language teaching.

On that basis, the Government's proposals for English language learning are a huge missed opportunity - one which we hope and expect that the Government will quickly correct.

In England, asylum seekers are not currently entitled to free and immediate English language teaching. We believe this position should be changed, in order to accelerate people's integration; and that all asylum seekers should be able to access free English teaching from the time they claim asylum, as is the case in other UK nations.

Refugee integration

We applaud the much needed recognition by the Government within the Green Paper of the need to provide integration support to all refugees in Britain, regardless of their means of arrival.

We believe this support should cover several key themes, including greater support to help people into work. We believe this must be properly resourced and tailored to overcome the barriers which currently exist for refugees to gain employment.

Integration support during and after the asylum process is also urgently required. For the overwhelming majority of people within the asylum process, their experience features living on less than 50% of mainstream benefits, not being allowed to work and experiencing long delays on their asylum claim, within what is often an adversarial system. All of this damages people's ability to rebuild their lives following a long period of exclusion from mainstream services and the job market.

We also believe the Government should ensure the design of future refugee resettlement programmes draws upon the evidence and experience of what works best for the integration of refugees who come to the UK through this route.

In addition, changes to aspects of the state benefits system – including Universal Credit, the benefit cap and the 'move on' period – are also needed to improve refugees' integration prospects; as are changes to the UK's refugee family reunion rules. A focus on refugees' social integration in the UK is also required, with initiatives tailored to area-specific contexts.

Finally, in our view the Government must determine how it will measure integration, which we believe should be based on the progress made by individuals from their baselines upon arrival towards agreed individual goals.

Refugee Action's recommendations to the Government:

- Create a fund to allow all refugees to receive a minimum eight hours a week of formal, accredited English language teaching for their first two years in the UK, starting from within a month of their arrival in the country.
- Develop initiatives and provide funding to help all refugee women overcome the additional barriers they experience to learning English.
- Establish an ESOL Centre for Excellence; and develop an ESOL strategy for England, as proposed in the Green Paper.
- Provide free English teaching to asylum seekers in England from the point of their asylum claim.
- Extend and fully resource tailored employment support to all refugees.
- Make decisions on asylum applications far more quickly, and achieve the targets set for the time taken to make decisions.
- Allow asylum seekers and their adult dependants the right to work, unconstrained by the shortage occupation list, after six months of having lodged an asylum claim.

2. Introduction

Refugee Action is a national charity which works to enable asylum seekers and refugees in the UK to rebuild their lives. We are the leading provider of reception and integration services for resettled refugees in the UK, and we provide advice and support to thousands of asylum seekers and refugees every year. We also campaign with a wide range of partners to achieve change.

We welcome the opportunity to respond to the Government's proposals outlined within its Integrated Communities Strategy Green Paper.

Our response will focus primarily on two of the themes within the Green Paper – ESOL and refugee integration – which most directly relate to our work.

3. English for Speakers of Other Languages (ESOL)

3.1 Our experience

As part of Refugee Action's work with refugees in Britain, we have observed the crucial importance of being able to learn English for refugees' wider integration and wellbeing; and witnessed the growing difficulties refugees have in accessing timely and sufficient teaching.

Every day Refugee Action works with refugees who are determined to learn English. They know that learning English, more than any other factor, is the key to them being able to build successful, independent lives in the UK. When refugees learn English and are thereby able to integrate, society as a whole benefits. Without it, refugees are unable to find work, study, volunteer and become part of their local community.

In theory, refugees in England are eligible for fully-funded provision on the condition that they have attained refugee status and are in receipt of a qualifying benefit. However, our extensive research on this subject over the past two years has repeatedly demonstrated that in practice, swingeing cuts to ESOL provision mean refugees are finding it ever harder to learn English, and have resulted in:

- Long **waiting lists** of many months and often years.
- Insufficient **learning hours**.
- **Gender barriers** to learning, with many refugee women facing additional hurdles including lack of access to childcare.
- Individuals being assigned to **unsuitable classes**, either at a lower or higher level than their current learning standard.
- Requirements on people to undertake prohibitively costly and lengthy **travel** to colleges a long distance from their homes.

Every day we witness the clear and severely damaging impact this has on refugees' integration – their ability to rebuild their lives, find work or study, volunteer and play an active role in their new community. People's lives are forced to remain on hold. It is self-evident that maintaining such barriers to refugees' integration is not in the interest of refugees, or in the interests of wider UK society or economy and therefore urgent action is required.

One Refugee Action client, Alaaⁱ, told us:

"If we spoke the language, then adapting to our new life here would be much easier. It is a barrier and it should be removed."

The single biggest factor causing this increasingly bleak picture is the huge cuts to Government funding for English for Speakers of Other Languages (ESOL) in England, which fell from £203m in 2010 to £90m in 2016 – a real terms cut of 60%. These cuts have directly resulted in a reduction of participation in ESOL of 65,000 people, or more than a third (36%) of all ESOL learners in England since 2010, over a period when demand has arguably increased.ⁱⁱ

Many of the refugees we work with access informal, community-based, volunteer-led English language practice sessions – either as well as or increasingly instead of formal, accredited learning (usually at an FE college). In some parts of England, Refugee Action provides these services directly; in the majority of areas where we work with refugees, we partner with local organisations to identify opportunities to match our clients with such services. We know through this experience that informal learning is invaluable, providing an opportunity for additional practice in a relaxed environment.

However, while we recognise and appreciate the value of informal learning, it is of real concern that increasingly such provision is the only opportunity many refugees have to learn English, as a result of lack of suitable formal learning. We believe that informal learning is an essential complement to, but cannot be a replacement for, formal accredited English teaching, delivered by qualified teachers and providing the qualification certificate which refugees need in order to access further education or employment.

3.2 Our research

In view of the deteriorating situation we witness on a daily basis as outlined above, Refugee Action decided to call for systemic change at a national level. We therefore launched our Let Refugees Learn campaign in May 2016, in addition to the ongoing, day-to-day advocacy which our caseworkers undertake at a local level to try to ensure their clients have timely access to sufficient, quality English language teaching.

Our Let Refugees Learn reportⁱⁱⁱ found that there was a strong economic case to view funding ESOL as an investment by enabling refugees to gain work and effectively reimburse the cost of ESOL teaching through taxation. A refugee earning what was at the time the annual average wage of £25,5322 would contribute £5,000 a year through income tax and national insurance. Even at a lower annual wage of £18,000, an individual would ‘pay back’ £2,590.

Where refugees are guaranteed two years of ESOL learning, with an average of 300 learning hours a year, the cost of the teaching is effectively reimbursed following an individual’s first eight months of employment at the national average wage and after 15 months at the lower wage. We therefore urged the Government to look on ESOL for refugees as an investment rather than an expense.

In March 2017, we published our ‘Locked Out Of Learning’ report^{iv}, based on research carried out among seven of the largest ESOL providers in England and found that:

- Several providers reported refugees waiting over a year for English lessons – and in one area the wait can be up to two years.
- Of the providers surveyed, the average waiting list size was over 700 people.
- Some providers had waiting lists for lessons stretching to more than 1,000 people.
- Providers told us the situation is getting worse – the main reason is government cuts, with funding failing to keep pace with high demand.
- Limited childcare provision is cited as a barrier to women being able to attend classes.
- Some providers have been forced to cut the number of ESOL hours offered by over half in recent years.
- Due to unmanageable numbers, certain providers have stopped taking new applicants for the first time in recent memory in order to cope with the backlog.

Furthermore, as part of our work with the Jo Cox Commission on Loneliness, in October 2017 Refugee Action published research^v among 71 ESOL providers in England, who between them represent a total of 35,563 ESOL learners (around a third of the overall total).^{vi} Our survey found that supply continues to fall significantly short of need. Despite the attempts of providers to keep up with demand, in the context of continued cuts to funding over recent years we found that:

- 63% of providers surveyed said the quantity of ESOL provision they offer is insufficient for most people’s needs.

- Over half (52%) said that their ability to provide high quality ESOL classes has worsened over the past five years.
- Of those which had waiting lists, 45% said that learners can wait an average of six months or more for classes. One provider had 800 people on their waiting list; another told us that learners can wait for three years to be assigned to a course; and another that the wait could be 'indefinite'.
- Another provider told us: "Current provision is not fit for purpose...most of our learners require more than 2.5 hours but we do not have the capacity to provide this."
- 77% of providers either had no facilities for childcare or said what they provide is not enough for the needs of most learners. This disproportionately affects female refugees' ability to attend classes.
- Of those providers with waiting lists, 80% said insufficient government funding was the main reason for long delays.
- Two thirds of all providers (66%) told us that an increase in government funding would be the one thing that would most improve their ability to provide adequate quantities of high quality ESOL lessons.

At the same time, Refugee Action held six focus groups across England with a total of 41 refugees and asylum seekers to discuss their experiences of loneliness since arriving in the UK. The people we spoke to told us that not being able to speak the language is one of the single most important causes of loneliness and isolation. They explained how, through learning English, they were able to find work; but also to do important everyday things such as going to the doctor and learning to drive.

At one of these focus groups, Maryam told us about her feelings about learning English:

"Life is up and down. Sometimes lonely. Life isn't easy... Sometimes I have bad depression. I come here and talk to people and have less depression. I go to English class and feel strong."

3.3 Others' experience

There is a large body of evidence which supports Refugee Action's research, with many other reports also highlighting the importance of English language learning to support refugees' integration and wider social and economic wellbeing; and the impact of government funding cuts.

The Casey review

Firstly, Dame Louise Casey noted in her review on opportunity and integration^{vii}, commissioned by the Government: "in relation to integration and economic success, one factor that stands out strongly as a barrier to progress is proficiency in English."

Furthermore, she noted the important gender and safeguarding dimensions to English language learning, and that lack of English was "hampering understanding of rights and services available" and resulted in victims of domestic violence "having a reliance on a husband's English skills economically and socially, making a victim more fearful of seeking help."

The Casey review's recommendations included: "The Government should support further targeted English Language provision by making sufficient funding available for community-based English language classes."

Dame Louise has subsequently reinforced these comments in media interviews and appearances before parliamentary committees, in which she has said: “The fact that we have cut English language... was one of our mistakes”^{viii} and called for a “very significant boost” in English language provision.^{ix}

UNHCR research on integration

In its report on the Government’s Syrian Vulnerable Person’s Resettlement Scheme^x, based on interviews with 167 refugees who had arrived in the UK through the programme, UNHCR found “strong enthusiasm” among refugees to attend ESOL classes; and that “the acquisition of English language skills is viewed as vital by all refugees interviewed for a number of reasons”. These were:

- Entering employment, enrolment on vocational and skills training courses and upgrading qualifications.
- A desire to deepen engagement with their neighbours, and to hold meaningful conversations as a critical step towards belonging in their new communities.
- English was seen as vital to being able to manage their healthcare treatment, with many having arrived with complex health needs requiring frequent hospital visits and medical correspondence.
- Knowledge of English will help them better understand the law, culture and norms of the British society, which in turn will help them become successfully integrated in the UK.

UNHCR welcomed the Government’s additional support for ESOL teaching for adult resettled Syrian refugees; but pointed out that “strengthened English language provision would also play a similar role in enhancing the integration prospects for non-Syrian refugees.”

APPG on Refugees report

In its wide-ranging enquiry on refugee integration in the UK^{xi}, the All Party Parliamentary Group (APPG) on Refugees concluded that “we are concerned at the evidence we received showing the shortage of suitable English language classes. While the recent additional funding announced to provide teaching for resettled Syrian refugees is a welcome acknowledgement of the importance of ESOL classes, similar support is needed for all other refugees.” The APPG recommended that the Government should “increase the level of funding for ESOL classes.”

APPG on Social Integration reports

In 2017 the All Party Parliamentary Group (APPG) on Social Integration published two reports on the integration of immigrants.^{xii} It found that “speaking English is the key to full participation in our society and economy, and is a prerequisite for meaningful engagement with most British people.” The APPG urged the Government to “markedly increase ESOL funding”, and to consider that “the ability to speak English should be viewed as a right extended to everyone in our society no matter what their background or income level.”

Public support

We also know that the public is strongly in favour of refugees being able to learn English. In opinion polling commissioned among the public by British Future, 73% of people said they believe that Britain and local communities benefit from refugees speaking English; and almost two thirds (60%) say that the Government should fund English language provision for refugees.^{xiii}

This comprehensive and widespread research and analysis, from Refugee Action and from other stakeholders, clearly demonstrates:

- the enormous **value and importance** of refugees and others being able to speak English;
- the **strong support** for this among the public;
- the significant and growing **lack of ESOL provision** as a result of Government cuts;
- the **damaging impact** this has on refugees and on others;
- and the pressing need for **urgent Government action** to remedy this situation.

3.4 Government response so far

Over the past two years, we have been encouraged by public statements from ministers acknowledging the importance of English language teaching for refugees. These statements have been accompanied by some measures to boost ESOL for some refugees.

The then Home Secretary announced in September 2016 an extra £2m a year for five years for ESOL for refugees resettled through the Government's VPRS and VCRS programmes.^{xiv}

In August 2017, the Home Office and DfE issued an instruction to local authorities that this funding must provide a minimum of eight hours English teaching to refugees by the end of their first month in the UK^{xv}.

In addition, the Home Office has funded year-long posts in every region to help councils commission additional ESOL services and support community ESOL; and has committed £2.3m, spread over four years, for local authorities to bid for to fund schemes to overcome childcare barriers to women's participation in ESOL.^{xvi}

All of these are extremely positive first steps, which Refugee Action has welcomed, in starting to address the underfunding of ESOL; the need for refugees to receive sufficient learning hours each week; and to enable some refugee women to overcome the additional barriers they face in accessing learning.

However, while welcome, we remain deeply concerned that these efforts are limited, and are restricted to one relatively small group of refugees, who arrive through two of the Government's resettlement programmes. While these refugees unquestionably want and need the additional English language teaching which these initiatives afford, the majority of refugees in Britain do not directly benefit from this. This is despite those refugees having exactly the same need and desire to learn English, and facing the same barriers – but their opportunities are significantly reduced on the apparently arbitrary basis of their nationality and their means of arrival in the UK. We do not believe this distinction is justifiable and instead, the Government should provide increased levels of English language support to all refugees.

In addition, we note that the Government launched the Controlling Migration Fund (CMF) in November 2016, which aims to mitigate the impact of immigration on local communities. It includes £25m a year for four years from which councils in England can bid for funding to tackle "local service impacts", and we were delighted that the Government confirmed that these applications can include ESOL provision.

We await information from the Government on the number, amount and proportion of CMF grants so far which have been used to fund ESOL provision – and certainly, we understand anecdotally from local authorities and groups that demand for this has been high. Initiatives funded by the CMF could, moreover, provide the evidence base upon which local authorities can secure long term resources to address barriers to integration in their local area.

However, we are aware that councils are under no obligation to fund ESOL through the CMF; and if they choose to apply for ESOL projects, there's no guarantee they'll be successful. Therefore, while the CMF forms another welcome contribution to the pressing shortfall of ESOL provision, it can only be viewed as a further small, piecemeal contribution to the necessary response to the ESOL funding crisis, rather than a systematic or sustainable response. Local authorities will require ongoing resources to support the infrastructure needed to respond to increasing needs.

3.5 A snapshot from Refugee Action's services

To inform our response to the Green Paper consultation, Refugee Action looked at current ESOL provision within two specific areas where we provide services to refugees and asylum seekers - one among refugees resettled through the Gateway programme in the North West of England; and another among refugees, asylum seekers and other migrants in Bradford, one of the five Integration Areas proposed in the Government's strategy.

North West England

Resettled refugees will attend a Job Centre Plus (JCP) shortly after their arrival in the UK, to register for state benefits. If claiming Jobseeker's Allowance (JSA) or the equivalent elements of Universal Credit, they will agree a 'Claimant Commitment' which sets out what steps they will take to enter employment. For this group of people, if their work coach identifies their English language skills as a barrier to their gaining employment but they are otherwise deemed to be ready to seek work, the JCP work coach should refer them to an accredited ESOL provider, which will then assess them and seek to match their current learning level with a suitable class. However, in some cases we have found that some JCPs either fail to make a suitable referral or attempt to refer clients but are unsuccessful. For example:

- In some areas, clients who are assessed as being at Pre-Entry Level have been unable to start classes due to particularly acute shortages of provision for this level.
- Some were referred by one JCP to community provision led by volunteers. However, the volunteers reported that it became necessary for them to turn students away because they didn't have enough room to meet the high volume of people JCP were referring. The volunteers reported being required to mark students as having 'attended' classes in order for them to avoid benefit sanctions; but in reality the clients were unable to stay for classes due to the lack of spaces.
- One JCP provided clients with leaflets about a class but offered no help to get them a place on a course beyond this.
- Some clients were offered a very basic and non-assessment based community course.

In addition, not all refugees will be referred to ESOL - for those clients, Refugee Action will seek to signpost them into suitable local ESOL provision.

In theory, JCP referral ought to be one of the most rapid ways any refugee can gain access to English language classes. We took a snapshot of the situation for the year up to the end of April 2018 for 220 adult refugees we work with through the Gateway resettlement scheme

in five metropolitan boroughs in the North West of England. Of these, 81 were JCP referred; and we found that in practice, significant delays are widespread even here.

The average wait for someone to have an ESOL assessment, following a JCP referral, was 45 days. This was broadly consistent across all five local authorities – the local authority with the lowest average waiting time between referral and assessment was 34 days; the one with the highest average waiting time (which was also the local authority accommodating the highest number of refugees) was 52 days.

Across all five local authorities, the lowest waiting time between a JCP referral and an ESOL assessment was 6 days; the highest was 100 days.

The ESOL assessment does not result in refugees immediately starting classes – within this snapshot, we found that while some clients were able to start classes within a few weeks of their ESOL assessment, others were waiting a further two or more months before actually starting to attend classes.

Of the 220 resettled refugees, 139 were not referred for ESOL assessment by their JCP. This is for a range of reasons – for example, because the refugees are on Income Support (or equivalent elements of Universal Credit) or Pension Credit; or in many cases, on a joint Job Seekers' Allowance (JSA) claim, which typically results in only the main applicant being referred.

In these cases, Refugee Action works directly with local ESOL providers to ensure clients receive an ESOL assessment. We then identify suitable ESOL provision for the client so they can at least start to learn English – even if in many cases this is initially for a very small number of hours a week and/or only with an informal, unaccredited provider.

We also found that women were having to wait longer than men to receive their ESOL assessment and therefore start learning English. Among the 81 adult refugees who were referred by their JCP, men waited an average of 41 days between their JCP referral and their ESOL assessment; women waited an average of 50 days.

Furthermore, it is notable that far more women than men are not referred for an ESOL assessment by the JCP. We found that of the 81 refugees who were referred by their JCP, 41% were women; of the 139 refugees who were not referred to an ESOL assessment by the JCP, 71% were women. In many cases, this will be due to women being dependants on their husband's benefits claim; or being on Income Support rather than JSA.

It is important to note that resettled refugees receive government-funded integration casework support, which can help expedite their access to learning, albeit within the very significant constraints of a severe shortage of provision. The majority of the refugees in the UK are granted status through the asylum route, and receive no such support – for them, the barriers for them to start attending classes are considerably greater and the wait considerably longer.

One client, Manal, told us:

"I really struggled to get access to English lessons. Every time I went to the job centre they told me that I have to wait longer. A few months ago, they offered me a place at the same time as my husband. I could not attend because of my young son. I was then told that either I or my husband can attend so that one of us could stay home with the boy, so I ended up staying home. So, I missed three months."

We believe it is entirely unacceptable for refugee women to be routinely required to wait longer than men to begin learning English; and for female and male refugees who are otherwise ready to work to have to wait many months before even starting the English language classes which will enable them to gain employment.

The view from an integration area

Refugee Action spoke with clients and providers in Bradford, one of the government's five proposed Integration Areas. In Bradford, Refugee Action runs two projects specifically focused on improving people's integration outcomes:

- The Children and Families project enables newly arrived children and families seeking asylum to integrate by accessing education, resolving housing issues, and meeting integration needs. In particular, the project offers a space for families to come whilst children wait to be allocated a school place, something that can take several months.
- Our Working English project helps people from refugee backgrounds to develop their employability by improving their English and engagement with volunteering and employment opportunities with the support of a volunteer mentor.

Through these projects, we see the difference that learning English has both to individuals and to their families. For instance, when parents are able to speak and understand English this lifts a great strain on their children who may previously have had to translate or interpret sensitive or distressing information. Many of the people that we work with have a basic level of English, and can greatly benefit from the volunteer-led sessions that we offer.

However, others require more advanced qualifications in English which are often not available in Bradford. Jamal, for instance, is a Syrian refugee living in Bradford. He worked as a pharmacist before fleeing the country and hopes to apply for a PhD to study microbiology in the UK. In order to be able to do so, however, Jamal requires advanced IELTS certification. He told us that accessing ESOL has been his "biggest problem" since arriving in the UK. It took him four months to find an advanced course and he received no support with this. In the meantime he attended voluntary classes, however he told us that some of his classmates barely knew how to read and write in their own languages and so the classes were inadequate for his needs. The closest centre that offers the specific training that Jamal requires is based in Leeds, and the return train journey is almost £12, which Jamal until recently was paying with the tiny amount of asylum support he received every week. He told us:

"The day I go to the class, I can't do anything else."

Jamal now has refugee status, but feels that every day he spends outside of classes is a day wasted in rebuilding his life.

The specific challenges faced by Jamal will be common to anybody who needs a formal qualification to enter work or education, and increased provision of formal ESOL classes will be the most effective way of addressing this gap. Even for those who have a more basic level of English, however, progression on from volunteer-led classes is a challenge in Bradford.

One FE college in Bradford which runs both accredited and volunteer-led ESOL classes told us that once people have had access to volunteer-led classes there is often nothing more advanced available for them to continue onto: "there's a place for [volunteer-led ESOL] but progressing people off it is what we find challenging." Moreover, according to the college, as

funding for ESOL decreases it is becoming harder to justify from a financial perspective and the risk that colleges will reduce their ESOL provision grows.

Another provider that runs volunteer ESOL classes, and until recently was able to provide accredited courses, similarly told us that volunteer-led ESOL was only helpful when the possibility exists to move onto more formal, accredited classes afterwards. According to the provider, accredited courses give people a sense of measured progress that is difficult to reproduce with less formal, volunteer-led provision. Accredited classes, they told us, are “a step on a journey... people are looking ahead with it”, whereas volunteer-led classes are an excellent facilitator of integration but less effective when it comes to concrete learning outcomes for students. This goes to show once again the distinct, yet complementary, nature of the two types of provision – and supports the argument for an investment in them both.

3.6 Our response to the Government’s proposals

We agree with the Government’s assertions throughout the Green Paper on the importance and value of everyone being able to speak English. We also welcome the tone and language used, particularly on enabling people to overcome loneliness and isolation.

However, while the assertions and tone may be welcome, overall we believe the actions proposed and crucially the lack of new funding contained within the Green Paper are wholly inadequate to address the challenges and achieve its stated objectives.

Positive steps

While the overall picture is severely lacking, there are undoubtedly some specific elements within the proposals which are to be welcomed.

Proposals to improve the Government’s data collection on ESOL, and to focus efforts on the particularly acute shortages at Pre-Entry and Entry levels, are to be encouraged. The latter is something we frequently witness through our own work with refugees and clearly means that many refugee and others struggle even to get to the starting point of their learning.

We welcome the Government’s intention to develop an ESOL strategy for England. Refugee Action is one of many organisations which has long called for this, which will bring England in line with the rest of the UK. We agree with the suggestion within the Green Paper that the strategy should be in order to create clearer pathways for learners, improve outcomes and secure better value for the taxpayer by making best use of existing funding. We also believe that any strategy should contain clear objectives and targets, in order to be able to measure actual progress against these.

In addition, a focus on improving local co-ordination, of the kind successfully pioneered in locations including Hackney, Leeds and Nottingham, is very welcome to help better join up existing local provision and signpost learners within it. However, we also note that without an increase in provision, such measures can only ever achieve so much.

The proposed new “community-based programme”, while clearly of benefit more widely, is unlikely to directly benefit many or any refugees, given its clear focus on supporting people who have lived in the UK for many years rather than new arrivals. In addition, we understand that this is in fact simply a relaunch of a fund which MHCLG has operated since 2013, and as such is unlikely to make any new or additional contribution to addressing the shortfall in ESOL provision.

ESOL Centre of Excellence

We also commend the Government for its intention to develop an online hub for ESOL.

Support is much needed for the many voluntary, community and faith groups which offer valued informal English teaching or conversation practice, often with very limited or no resources. By providing a means – certainly online and we believe also face-to-face – for established groups to access and exchange information, resources and good practice, which we have referred to as an ESOL Centre of Excellence, the Government can significantly boost these group's capacity to maintain and grow their work, and help drive up standards of informal teaching.

Such an initiative should also offer guidance and help to new groups to establish themselves; and draw upon existing resources and good practice not only in English language teaching or practice; but also in attracting learner; understanding their needs; and employing appropriate safeguarding approaches and policies necessary when working with vulnerable individuals and groups.

However, while an online resource is needed and welcome for all of these reasons, we would caution against an over-reliance on digital learning methods as these are unlikely to be suitable or accessible to many of those most in need of English language teaching. Therefore, while an online resource as a means for voluntary practitioners to share resources, information and good practice is very welcome, we believe learning itself should be accessible to all and should ideally take place in a face-to-face environment.

We also believe the proposal to develop a network of conversation clubs have the potential to be helpful. We are keen to learn more about this proposal – but on the face of it, as long as it is linked to and enabled by the online hub or Centre of Excellence, a network such as that proposed within the Green Paper could allow groups which currently provide valued opportunities for people to practice their English in an informal environment to connect with one another to share experiences and resources; and to overcome the isolation which many such groups inevitably feel by allowing them to be part of a wider national initiative.

Refugee Action has long called for such initiatives to support and boost community-based volunteer-led English programmes, as an important addition to – but not as an alternative or replacement for - formal accredited learning necessary for gaining qualifications that grant entry to training, further education and employment. We look forward to working with the Government to share our views, experience and insight in this area and contributing to the successful development of these schemes.

Funding

Most significantly, we were very surprised to see that while the Government details many reasons for barriers to English language learning, all of which are salient, the Green Paper does not refer anywhere to unquestionably the single most important factor in creating and maintaining barriers to English language learning – the cuts to ESOL funding of 60% in real terms between 2010-17 and the resulting drop in participation. According to our research, these cuts have also led to people having to wait longer to start accredited classes; and receiving fewer learning hours a week when they are able to eventually start learning.

Refugee Action has previously called on the Government to create a £42m fund to allow all refugees in England to receive a minimum eight hours of formal, accredited English language teaching for their first two years in the country, starting from within a month of their arrival in the country.

Yet astonishingly, in view of the overwhelming evidence of the consequences of the huge cuts to ESOL funding in recent years, the Government's long-awaited proposals do not contain any new funding for ESOL.

The Green Paper's proposal for a new infrastructure fund currently has no funding attached to it. We look forward to learning more about the fund and its purpose. However, while ESOL infrastructure improvements are necessary, they do not in themselves directly lead to more people being able to access English teaching, or for people who are learning to receive an adequate number of learning hours. In addition, we suspect that any new funding which does eventually emerge is likely to be very limited; primarily targeted towards the five Integration Areas rather than the country as whole.

We share the view of the House of Lords' Citizenship and Civic Engagement Committee, which in its recent report pointed out: "The Government proposes a new fund, but no new funding... the Green Paper itself makes no mention of additional funds." We welcome the committee's recommendation that the Government must "restore funding for ESOL teaching to its 2009/10 levels"^{xvii}

The Government's proposals fall woefully short of what is needed in practice, and appear to have ignored the huge weight of available evidence; as well as the recommendations of multiple parliamentary and others bodies; as well as Dame Louise Casey's recommendation in her report for the Government on the need for increased funding for ESOL.

As a result, we do not believe that the measures outlined within the Green Paper will enable a single individual refugee to access a single additional hour of accredited, formal English language teaching.

This is wholly unacceptable. On that basis, the Government's proposals for English language learning contained within the Green Paper cannot be considered as anything other than a huge missed opportunity.

English for asylum seekers

We are also disappointed to see that the Green Paper contains no reference to or proposals on English language teaching for asylum seekers.

Asylum seekers in England are currently not eligible for free ESOL teaching. Instead, asylum seekers aged 19 or over become eligible to register for ESOL for a 50% contribution to the costs of ESOL classes through the Adult Education Budget, when they have been in the UK for longer than six months and are awaiting a decision on their asylum claim.^{xviii}

Given that most asylum seekers aren't allowed to work and are forced to meet all of their essential living needs on a weekly asylum support payment of £37.75, it is highly improbable that any asylum seeker will be able to pay 50% of tuition fees which will cost several hundreds of pounds. In addition, anyone able to afford the fees is highly unlikely to be able to start classes as a result of the long waiting lists which exist for ESOL learning.

Olivia had been waiting almost four years for an initial decision on her asylum claim when we spoke with her. She told us that going to college had made a huge difference to her life, and had made the waiting more bearable for her:

"Before I started going to college, I was really depressed. [Going to college has made a difference] because it's just being with other people. It sort of makes you feel safe, and just makes you think you're not alone. But when you're just in your house, just thinking of your asylum process..."

The approach in England is in marked contrast to other UK nations – Scotland and Northern Ireland both currently provide fully-funded ESOL teaching to asylum seekers, from the point of their asylum claim.

We believe that being able to learn English is essential for people in the asylum system who do not already speak the language. There are very clear advantages for those who are subsequently granted refugee status, in enabling more rapid integration. In addition, allowing asylum seekers to learn English would also allow people to engage more effectively with their asylum cases and mean that they can use their time usefully whilst waiting for a decision.

We therefore believe that all asylum seekers in England should be entitled to free English teaching from the point of their asylum claim; and that this teaching can be delivered through a combination of formal and informal means.

Recommendations on ESOL

In summary, we believe the Government should:

- **Create a fund** to allow **all refugees** to receive a minimum **eight hours a week** formal, accredited English language teaching for their first two years in the UK, starting from within a month of their arrival in the country.
- Continue to develop initiatives and provide funding to help **all refugee women** overcome the additional barriers they experience to learning English.
- Pursue the proposals outlined in the Green Paper to:
 - establish a **Centre for Excellence** for informal, volunteer-led English learning;
 - improve ESOL **co-ordination** in local areas;
 - develop an **ESOL strategy** for England.
- Provide **free English teaching to asylum seekers** in England from the point of their asylum claim.

4. Refugee Integration

Refugee Action has almost 40 years of experience of refugee integration. We are the leading UK charity delivering integration support to resettled refugees – in 2017 we worked in partnership with 20 local authorities to support over 1,400 refugees, through the Government’s VPRS, VCRS and Gateway refugee resettlement programmes.

Alongside our work with resettled refugees, every day Refugee Action works with people who have been granted status after a successful asylum claim. Their integration journey is made unnecessarily harder and lengthier as a result of restrictions within and the nature of the UK’s asylum system. People tell us how difficult it has been to move on with their lives, given the time they wasted in the asylum system with little to do but stay at home and worry about their claims. Caleb, one of Refugee Action’s clients who was granted status after a two-year wait, told us:

“The waiting was hard... My social life is completely destroyed, I [haven’t] moved forward in my education. Sitting for two years demoralises you. As a human being, can you imagine sitting at home for two years? It was very hard... During two years, I missed out on many

things. Now I've started to plan. I couldn't do that before. Now I'm trying to recover my potential... [the waiting] made it more difficult. But I will try my best."

This work on refugee resettlement and also our work in providing information, guidance and support to asylum seekers has enabled us to identify, develop and share good practice in integration; and affords us an overview of current provision, what is working and where improvements are required.

Refugee Action's service experiences

Refugee Action's service models integrate casework, individual empowerment, and voluntary and community sector provider collaboration. Using a multiagency approach, we bring refugees and specialist agencies together to produce tailored responses to their needs.

Refugee Action's work to support integration includes:

- Improving refugees' health and wellbeing, both through direct interventions with health providers and the NHS in the North West and through community projects which improve the health and mental wellbeing of people seeking asylum, and reduce their isolation through the development of local community connections.
- Increasing refugees' employability through a tailored, strengths-based approach, both through our resettlement services and in our work with newly-recognised refugees granted status through the asylum route.
- Enabling refugees to navigate their new environments by orienting people to their local area relevant to their needs including finding key services and using public transport.
- Championing and building capacity of community leaders in Birmingham, Manchester and Liverpool through working with Rethink Rebuild Society.
- Engaging key community organisations, for instance through a 'Welcome and Thank You' event in Worcestershire which brought together resettled Syrian families and people who had supported them through their resettlement journey. This resulted in regular social meetings.
- Building the capacity of refugee support organisations through skill sharing and advice.
- Enabling refugees to find volunteering opportunities in the local community.

Refugee Action applauds the much needed recognition by the Government in the Green Paper of the need to provide integration support to all refugees in Britain, regardless of their means of arrival.

We understand that this proposal is still in the early stages of development, and as such currently lacks much in the way of detail. We look forward to working closely with the Home Office and with other government departments in the coming months to share our experience and help shape the proposal into more concrete propositions and plans for action.

For now, we will outline some of the main themes which we believe the Government's approach to the integration of refugees and asylum seekers must take into account.

Clearly, English is the vital first step to refugees' integration, and we have responded in detail to the Government's proposals on this theme separately within this written submission. In this section, our response to the Government's proposals for refugee integration will cover six main themes:

- employment;
- state benefits;
- the future of refugee resettlement in the UK;
- integration support during and after the asylum process;
- family reunion;
- social integration;
- the importance of locally-led responses; measuring integration.

4.1 Employment

Part of our integration support for both resettled refugees and people who have been granted status through the asylum system includes supporting people into employment, which we know is a vital step in the successful integration of refugees. It brings substantial benefits for the refugee themselves and for the UK more broadly.

There are many barriers toward accessing employment which are specific to refugees, which will not be overcome without targeted solutions.

Refugee Action has a strong track record in refugee employment mentoring and volunteering programmes including delivering the government-commissioned Refugee Integration and Employment Service (RIES) 2008-2011; Employment Mentoring Projects in London and Birmingham; our current Gateway Resettlement Programme which offers employability skill development; and Working English in Bradford which blends ESOL, mentoring and employability training. Tailored support is critical to enable refugees to build their confidence and skills to take up employment.

There is currently inadequate tailored support for people who are furthest from the job market, i.e. people with health issues, caring responsibilities, limited English, inadequate income or housing. Addressing this is essential if we are to ensure inclusive, equitable approaches to ensuring economic independence for all. Mainstream employment initiatives do not adequately understand refugees' needs or provide the appropriate support to overcome structural barriers. Moreover, there is currently no national strategy for supporting refugees to overcome these barriers. Earlier national integration and employment programmes to support refugees into work, in which Refugee Action was one of the main providers – such as Sunrise and RIES – were terminated by the Government. More recent pilot programmes on refugee employment, while welcome, have been limited in their scope and geographic reach. Partly as a result of this, refugee unemployment remains significantly greater than the wider population.

The risks of failing to adequately support refugees into employment include long-term unemployment and poverty among refugees, and associated costs to UK public funds; missed opportunities to make best use of refugees' pre-flight skills, qualifications and work experience; mental health problems; failure to integrate and consequent community cohesion problems.

Regarding the Government's proposal to continue supporting specialist interventions to help refugees into employment, based on our experience of supporting refugees into work we believe a successful approach must incorporate the following five points:

- **Group courses on entering the jobs market**

Many refugees are hampered at the beginning of their journey toward employment in the UK by a lack of awareness of how the jobs market operates and a lack of confidence in their abilities. A group “welcome to the jobs market” course can quickly bring a number of newly-granted refugees simultaneously up to the same baseline of knowledge about the UK jobs market. Courses should include:

- Stages of the recruitment process
- Where jobs are advertised
- Different application methods
- CV writing
- Key terminology
- Referees
- Matching of suitability with the requirements of different positions

- **Employment casework**

Whereas some barriers are shared across refugees from a range of backgrounds, many barriers are personal to each individual, their background and their circumstances. It is therefore vital that, in addition to group courses, employment support is tailored to the individual, based on assessment of their specific circumstances and needs. This requires one-to-one sessions with an employment caseworker with activities which should involve:

- Reviewing the baseline knowledge of the UK jobs market (and filling in gaps or referring back into groupwork where appropriate)
- Assessment of the individual’s specific circumstances and needs (including language, housing, health, immigration status, and experience) and action planning on steps toward overcoming their personal barriers, to achieve realistic goals.
- Identifying training needs and referral for training
- Identifying other barriers and additional support needs (for instance childcare legal status, family reunion, and travel documents)
- Obtaining comparison of qualification equivalency between the UK and countries where they have obtained qualifications
- Help with learning how to apply for jobs (including how to complete application forms, CV writing, and interview skills)
- Assisting refugees to reflect on unsuccessful applications to establish learning for subsequent applications
- Sustaining the refugees’ motivation and morale by highlighting the successes of the small steps they are taking toward employment
- Referrals into mentoring and work placements (see below)

- **Volunteer employment mentoring**

Refugee Action has developed a successful mentoring model, in which volunteers with experience of work in specific employment sectors are recruited from the long-term resident population. They are matched to refugees who wish to enter work in the same sector. The volunteer then provides bespoke employment mentoring drawing on their personal insight into the nuances of recruitment in the given sector. A mentoring approach empowers the individual to define and achieve their own employment goals. Mentors help people to more effectively plan and to define the aims and actions they will take to achieve these. A mentoring relationship helps them to overcome barriers by focusing on what the individual can do and linking them with goal-specific opportunities. A longer term innovation would see a more peer-to-peer approach taken in which refugees with experience of a job sector provide the mentoring. This would have the added benefit of drawing on their personal insight into the specifics of overcoming the barriers they faced as refugees.

- **Employer engagement**

As well as direct work with refugees, there is also a need for engagement with employers. Employers are often unclear about who has permission to work in the UK, what documents demonstrate this, the benefits of employing refugees and how they can be sensitive to the needs of refugees. Awareness-raising on areas like these can increase job offers to refugees. Engagement with employers can also result in the setting up of work placements and internships for refugees – often highly useful ways for refugees to experience the culture of UK workplaces first-hand, significantly increasing their confidence and employability.

- **Business start-up**

Some refugees have valuable skills but which do not lend themselves well to traditional employment. For instance, those with multiple languages may want to work as interpreters or translators but this often involves registering as self-employed or setting up a business. Where successful, in some cases, supporting business start-up can have a knock-on effect with the future recruitment of more refugees and other UK residents (including the long-term resident population). Setting up a business can be a complicated process for a refugee as it will involve activities like writing a business plan, registering the business and filing tax returns. In order for refugees to learn how to go about this, specialist, tailored one-to-one business support is vital.

Finally, we believe it's important that the approach outlined above is underpinned by a clear understanding that refugees in Britain are likely to fall into one of three broad groups:

1. Refugees who can realistically never be expected to enter employment (including elderly refugees and those with terminal illnesses).
2. Refugees who face substantial barriers to becoming employable which they could overcome after a period of time (including people with low English levels, caring responsibilities or debilitating health conditions that require treatment).
3. Refugees whose circumstances allow them to focus on entering employment.

Our proposals focus on helping refugees in the third group to access employment, since the interventions detailed above are likely to have the greatest impact with this group. Resettled refugees are brought to the UK on the basis of particular vulnerabilities and as such a greater proportion may fall into the second group. However, many refugees granted status through the asylum system also face substantial barriers to being work-ready at the point they are granted status – a lack of English language skills probably being the most common. As a result, it is important for many resettled refugees to have access to employment support activities sometime after arriving in the UK, and similarly important for other refugees to have access sometime after being granted status, rather than just in the first year as they may not be able to meaningfully make use of them or enter the jobs market straightaway.

4.2 State benefits

While a much stronger focus is required on getting into employment those refugees who are or can readily become work-ready, it's also important for the Government to acknowledge and act on the fact that the vast majority of refugees will start their life in the UK reliant on state benefits; and depending both on their circumstances and on the support they receive, some will remain on some form of state benefits for some or all of their time in the UK. However, we are concerned that aspects of the current benefits system and recent changes to it are frequently undermining the capacity and prospects of refugees to be able to integrate into their new communities.

Benefit cap

The benefit cap implemented in November 2016 has resulted in an increase in hardship faced by refugees, risking poverty and homelessness which in turn clearly damages refugees' integration.

Towards the end of 2017, we carried out a short survey on 21 households of refugees undergoing resettlement in eight local authorities. Most of Refugee Action's resettlement clients are accommodated as families with children, outside London. The cap means they cannot receive more than £384.62 per week in benefits. As a result, 14 families were required to pay over £50 per week from other benefits to top up rent payments. One family was required to pay over £140 per week. These amounts are significant for people on low incomes and the impact on the refugees included stress, anxiety, anger, frustration and a feeling of being misled about resettling in the UK. One said he worried that shortfalls in his rent due to the benefit cap made it hard for him to focus on his English classes and other aspects of his integration. Another said: "*it's always on our mind*".

Whereas refugees resettled in some areas are receiving support to mitigate the impact of the benefit cap, others are not receiving any support. Some have applied for Discretionary Housing Payments (DHPs) but have been refused. Some have then appealed against the refusal – sometimes but not always successfully. These situations are additionally stressful for refugees as the process can be bewildering and the uncertainty over whether they will receive help can last for some time, during which household budgets are uncertain, making the planning of household spending especially challenging. Supporting refugees through these situations takes up considerable casework capacity for Refugee Action staff and volunteers, meaning there is correspondingly less capacity for supporting refugees with other aspects of their integration such as access to healthcare, ESOL or overcoming barriers to employment.

DHPs are always time limited and there is an ongoing concern over what will happen when they end. In our experience, some refugees are awarded a DHP for one month whereas others last for six months or a year. Some people will face significant shortfalls when their DHPs end – whereas others may have further applications approved. Both groups need support to help them re-apply, and potentially to appeal against refusals.

We believe integration outcomes would be best be achieved by ending the benefit cap. If this does not happen, in order to maximise community cohesion and integration, the Government must make funding available to refugees and to others in the communities which receive them to ensure neither are at risk of poverty and homelessness.

Universal Credit

The introduction of Universal Credit is also causing grave problems to refugees in those areas where roll-out has taken place. In our work in Universal Credit Full Service areas, we have found that supporting refugees to resolve problems with Universal Credit has proved a huge drain on our resettlement casework capacity – thereby hampering our ability to support refugees' integration. There are particular challenges in managing online claims for people with weak English and IT skills; while funded support for managing claims online is currently inaccessible to our clients.

Errors, payment delays and rent arrears are negatively impacting on refugees and could jeopardise government resettlement targets by disincentivising housing providers from participating in refugee resettlement schemes. Vulnerable refugees are experiencing stress, confusion and financial hardship.

In 2017 Refugee Action submitted written evidence to the House of Commons Work and Pensions Select Committee inquiry into the rollout of Universal Credit^{xix}. Our evidence contained a series of recommendations to the Department for Work and Pensions, as well as to local authorities.

We note that the recent report of the Independent Chief Inspector of Borders and Immigration's investigation into the Vulnerable Person Resettlement Scheme discussed challenges refugees face with Universal Credit and the benefit cap. It recommended that the Home Office should "ensure that where the Scheme is dependent on support from, or affected by the decisions of, other government departments (for example, Department for Work and Pensions and Department of Health and Social Care) that ministers are sighted on any misalignments, and that where these exist practical solutions are found."

In addition to detailed recommendations to the Select Committee, we support the Chief Inspector's recommendation that ministers identify practical solutions to the many problems caused by Universal Credit to refugees and others.

Move on period

People who gain refugee status through the asylum route face frequently further challenges in moving off asylum support and onto mainstream benefits. This transition – known as the 'move on period' – is widely observed to be marred by administrative difficulties, often resulting in destitution. Inevitably, this prevents refugees from integrating at the precise point at which they should be able to focus on the opportunities – for English language learning, work and study – denied to them as asylum seekers.

These difficulties have been investigated by the British Red Cross^{xx} and Refugee Council^{xxi} among others. We share the view of these partners that the Government should extend to the 'move on' period beyond its current 28 days. We agree with the recommendation of the APPG on refugees in its report on refugee integration^{xxii} that the 'move on' period should be extended to 50 days, in order to minimise the risk of refugees falling into destitution and to enhance their prospects for integration.

4.3 Resettlement

The UK Government can rightly be proud of the success of its resettlement programmes, which have transformed thousands of refugees' lives and made Britain a widely acknowledged global leader in resettlement.

The UK's resettlement programmes are significant in Government efforts toward integrating refugees. The current programmes are due to end in 2020 and it is imperative that a transition to future resettlement programmes are as seamless as possible. This is an opportune moment to take stock of what does and does not work best for the integration of resettled refugees and ensure that future schemes maximise refugees' integration prospects.

Refugee Action has produced a paper setting out our perspective on the future of resettlement which we recommend the Government should take note of.^{xxiii}

4.4 Integration support during and after the asylum process

We support the Government's initiative as set out in the Green Paper, to employ Local Authority Asylum Liaison Officers to support people once they've been granted refugee

status. We view this as a positive step in recognising the many challenges that many people face when they are eventually granted status after having gone through the asylum process (see textbox below).

A community based integration model:

Since 2016 Refugee Action has been delivering an innovative empowerment and integration project for people in the asylum system, called Asylum Guides. The project aims to reach highly vulnerable people seeking asylum as early as possible to increase their understanding of the asylum system, and therefore their ability to engage with it meaningfully. In the last eighteen months, we have successfully run this project in Manchester, training 20 volunteers and supporting 193 people to navigate the asylum process.

The project is run by a Project Coordinator, who trains community based, volunteer 'Asylum Guides' to meet vulnerable people seeking asylum and brief them at key stages in the asylum process - from arrival until their case is concluded. These briefings enable people seeking asylum to a) understand the system; b) have a clear sense of purpose and decide the next steps best for them; and c) build the confidence to act and engage with the system. The project has delivered excellent outcomes for people seeking asylum; for instance, 100% of project beneficiaries secured legal representation and 100% of people met key Home Office deadlines.

One Asylum Guides client told us:

'I couldn't do anything before by myself, I couldn't ring a solicitor, I couldn't go to meetings, now I feel more confident, I travel to places myself, I ask my solicitor when I have questions. You helped me when I was in the dark'

The programme empowers people seeking asylum by increasing their understanding of the asylum system and confidence to engage with it to defend their rights, reducing their long-term dependency on specialist services and crisis case work. It also reduces people's isolation by linking them with a range of holistic services that enable them to maintain their wellbeing while they await the outcome of their asylum claim, such as community-based parenting, family support, befriending, and English classes. Their Asylum Guide simultaneously helps them to plan and navigate their asylum journey, anticipate potential crises, and access the community-based advocacy and social support they need to mitigate them.

Refugee Action believes this model could be successfully replicated to support the integration of people from refugee or migrant backgrounds with leave to remain. 'Integration Guides' could be trained in areas across the UK to brief new refugees and migrants on the housing, welfare, immigration, education and health care systems, and to signpost to skills and training opportunities, existing community groups and wider community activities in the area. This model benefits the community as well as the refugees themselves. As refugees are signposted to assets in the community, people have the opportunity to meet refugees and see the benefits they bring to the local area.

Without the right to undertake many basic everyday activities, and receiving just over £5 per day to live on, sometimes for many years, many asylum seekers we work with lose hope that they will ever be able to rebuild their lives.

The UK's asylum system currently assumes that integration starts once status is granted. But the impact of the asylum process, and the long delays that people are often subject to, do not vanish for them and their families when refugee status is granted. In reality, for those waiting to receive a decision within what is often an adversarial system, after a long period of exclusion from mainstream services and the job market, their ability to rebuild their lives will have been damaged.

Leila arrived in the UK with her parents when she was 14. At first she was included in her parents' asylum claim, but when she turned 18 she was told to apply for asylum in her own right. She told us:

"[Before I was 18] I was studying so life was normal, like other people. And then obviously life just stopped... It kind of cornered me from everybody else. It made me feel like I'm different from others and I can't do a lot in life because I finished my high school then I finished my college, but then I couldn't go to uni. And I couldn't work either. So it... made me feel like I've got something wrong with me. Obviously, I wanted to finish off my studies and I had so many plans, but I couldn't move forward [with my life]." Leila waited 14 months before receiving a positive decision on her claim. She is excited about applying for universities, and the prospect of studying again, but also told us that is time she will never be able to get back and that has been wasted.

The Scottish Government's approach^{xxiv} is centred on the principle that "integration should begin from the day an asylum seeker arrives in Scotland, and devolved services should, therefore, be organised to deliver this." We believe that this approach more accurately reflects the reality of refugee integration, which is shaped by people's experiences from arrival rather than simply when they are granted status.

It is vital that the UK Government addresses those elements of the asylum system which obstruct and delay people's subsequent integration. Two areas of particular concern are waiting times for a decision on an asylum claim, and restrictions on asylum seekers' right to work:

Waiting long periods of time for a decision

"Two years is [a lot]. I could have been working, I could have been in college or university or anywhere but... you can't really move. You see lots of energy in yourself, and you think you might be positive for society, and do something, to let you be active, but they just don't let you do anything." (Sardasht, waiting two years for an initial decision on his asylum claim).

Many people wait months, if not years, for a decision on their asylum claim. Home Office figures show that in 2017, more people than ever before were waiting longer than the Home Office's six-month target for a decision on their claim. At the end of 2017 this comprised almost half of all people waiting for an initial decision on their asylum claim.^{xxv}

Having to wait for months or even years for a decision on their asylum claim means that people experience long delays in accessing opportunities that could better equip them to rebuild their lives. This can particularly impact upon their prospects of finding work, and indeed evidence shows that lengthy asylum processes can serve to decrease the employment prospects of those granted refugee status.^{xxvi}

The waiting may also have irrevocable impacts on an individual's health, recognised in the Green Paper as posing considerable barriers to people's integration. Asylum seekers often have worse physical and mental health outcomes than the general population^{xxvii}, and sometimes post-migratory stresses can have a greater impact on mental health outcomes than past traumas^{xxviii}. One study undertaken in Lancashire^{xxix} noted that despite the increased risks of poor mental health amongst people seeking asylum, many face barriers accessing health services that include inadequate knowledge of services, poor systems for identifying safeguarding issues, frontline staff lacking awareness about how mental health services are accessed, and a failure on the part of mental health services to accommodate the needs of people seeking asylum. Lengthy processes, moreover, are likely to result in worsening mental health amongst applicants, with progressive deterioration as time goes by.^{xxx}

To remedy these issues, we refer the Government to our recently published report 'Waiting in the Dark'^{xxxi}, which explores these themes in detail and make a series of recommendations to the Government, including:

- **The Government should make decisions far more quickly, and achieve the targets it sets for the time taken to make decisions.**

Restrictions on the right to work

Whilst they wait for a decision on their asylum claim, most people are not allowed to work. People seeking asylum only have the right to ask for permission to work after they have been waiting for a decision on their asylum claim for over a year, if the delay is not thought to be the "fault" of the claimant themselves, and even then their employment is restricted to jobs on the shortage occupation list, which includes such professions as 'classical ballet dancer', 'nuclear medicine practitioner', and 'geoenvironmental specialist'. No Home Office data appears to be available on the number of people who are, in reality, granted the right to work under these restrictive conditions.^{xxxii}

Waiting a long time for a decision on an asylum application means that people will struggle to make up for lost time in the jobs market when they are eventually granted status.

Two Refugee Action clients told us about the impact which the restrictions on the right to work for asylum seekers had had on their employment prospects and wellbeing once they had been granted refugee status.

Samir waited 19 months before receiving a positive decision on his asylum claim. Before fleeing from Syria, he had worked in finance, but he told us:

"There is a big gap in my CV now. I've had my status six months and still I don't have a job. I already wasted one year and seven months and I'm still struggling to find a job."

Fatima had been waiting 18 months for a decision on her claim when we spoke with her. She has a doctorate, but told us:

"[t]hey waste our lives. I have got a PhD qualification but I can't use it. I feel like I've lost everything here. I spent five years to get my [PhD], and I've lost it now. No experience. No work."

- **The Government should allow asylum seekers and their adult dependants the right to work, unconstrained by the shortage occupation list, after six months of having lodged an asylum claim.**

Assisted Voluntary Return

We note that the Government proposes that the Local Authority Asylum Liaison Officers “will also have a role in facilitating the voluntary return of those not granted refugee status.”

Between 2010-15 Refugee Action operated the Choices Assisted Voluntary Returns service on behalf of the Government until 1 January 2016, when the service was taken in-house by the Home Office. Since then, there has been a reduction in the number of voluntary returns – we believe in part because of the absence within the Home Office’s model of impartial pre-decision advice or exploration of how to build a sustainable future and manage risks upon return.

We would urge the Government to consult with experienced third sector partners to develop its approach to this important and sensitive area.

4.5 Family reunion

We believe that family reunion rules should be amended to expand the eligibility criteria for who qualifies as a ‘family member’; and that more support should be made available to enable refugees to apply for family reunion for eligible family members.

From our work in refugee resettlement, we’re aware of many refugees expecting to be able to reunite with family in the UK and subsequently discovering there are barriers to their doing so and in some cases discovering it is not possible (and this being compounded by a lack of legal aid funding available for advice on this). In our experience, refugees cannot focus on their integration while they are living with uncertainty around whether they will be reunited with close family members.

We therefore strongly endorse the recommendations made by the Refugee Council and others for the Government to expand the criteria for who qualifies as a ‘family member’ for the purposes of refugee family reunion; and for legal aid to be made available for advice on refugee family reunion applications.

4.6 Social integration

It is essential for refugees’ social integration that tailored plans and interventions are developed to tackle issues specific to particular places. All integration responses should be structured around collaborative provision and capacity building of key existing provision and community assets in a specific area – housing, health, wellbeing care, social care, children’s education, orientation, and adult employment education and training. Interventions should work with key statutory, voluntary and community organisations in each area to co-produce the service deliverables to best meet refugees’ integration needs thereby strengthening the existing statutory, voluntary and community sector capacity and maximising offers of support to refugees, and helping refugees to understand how they can access support from within the existing infrastructure.

Social relationships, or social bonds, are one of the most important elements of effective integration^{xxxiii}. Refugees should be supported to plan how they will respond to their identified interests, for example by accessing voluntary work opportunities, join parent teacher groups of schools, and actively participating in their local communities. Local communities should be supported to understand the needs of the refugees and the value they bring to the host community. Personal integration plans should:

- Map existing provision and community assets in specific area.
- Use this mapping to develop services with established community organisations and faith centres.

- Provide capacity building support to welcome groups, faith centres and community organisations including ensuring the development of safeguarding measures for newer groups who come into direct contact with refugees.
- Support the development of existing refugee support networks.
- Work in partnership with the existing network of voluntary and community sector organisations within the county.

4.7 A focus on the local

In order to work well, responses to integration challenges must be area-specific and have a focus on the local level. Refugees should be empowered to engage with relevant support services in their local areas to address identified barriers to integration. These services may vary drastically according to geographical location. Existing infrastructure should be mapped at a local level, and any gaps should be bridged, in order to understand the access that refugees have to the services outlined above.

In addition to familiarising refugees with those statutory services which deal with housing, health and wellbeing, financial stability, education and skills, and employment, people should also be introduced to existing community services.

Integration plans should therefore capitalise on local community interest in particular areas welcoming refugees, and recruit community members into volunteer support roles. They should be trained and managed to maximise their contribution and manage risks. Community partners should be engaged to plan community cohesion and integration activities for integration. These activities should respond to existing community cohesion issues, build upon existing good practice, and establish a regular dialogue with host communities, engage them in refugee awareness projects and ongoing work around identifying any cohesion issues.

Locally-led responses must also engage with established communities, and any anti-migrant sentiment should be addressed by:

- Sharing refugee integration aims and progress through regular, targeted communication with community groups, clarifying people's rights and aspirations.
- Providing information about how to recognise, respond and monitor hate crime to refugees, support organisations, and statutory services.
- Facilitating dialogue with community organisations with particular concerns about the service to dispel myths and create local connections.
- Ensuring all staff and volunteers in community organisations are trained to support victims of hate crime.
- Build best practice in addressing cohesion issues and hate incidents amongst relevant statutory and community stakeholders.

Local authorities should ensure that anti-migrant sentiment is monitored and addressed through supporting early action prevention and safeguarding initiatives that involve a range of local stakeholders.

Rural Areas

Many rural areas have limited or no refugee and migrant services, and this may present specific challenges for refugee integration. In these cases, tailored local plans and interventions should be developed to address the following challenges:

- In rural areas, public transport is often fragmented and expensive. Refugees should be briefed on how to travel to services and supported to become confident to travel independently. Community volunteers can be engaged to accompany refugees on travel routes, and partners can be identified to provide community transport options.
- Rural areas are geographically dispersed. Clustering housing can enable people to build local connections among and with refugees. Gaps in essential services should be bridged by enabling local community and voluntary sector organisations to provide them by training them to build their awareness and skills to work with this client group and provide care pathways.
- Group work activities with other refugees and linking with existing local organisations should be developed, turning alienation into engagement and integration, and creating connections between established and new community members.

4.8 Measuring integration

The Government must agree on an approach to measure success in an integration programme for refugees. There is currently no agreed definition of integration or its indicators and people arrive with different levels of need in terms of their employability, English language proficiency, healthcare and multiple other factors that can impact on the success of activities supporting their integration – including their own attitudes toward integrating.

Progress with some factors is much more significant for some refugees than others. For instance, the integration needs of an elderly person in poor health with low English language skills will be very different to a healthy person of working age, with higher English language skills. It would be inappropriate to measure the success of supporting the former by their progress toward employability or measure the success of supporting the latter by their progress with accessing healthcare.

A poorly chosen measure of success for integration can be highly damaging as was the case with the former RIES programme which ended after providers failed to achieve an arbitrary, unrealistic target for the employability of refugees who were supported by the service. The quality of an integration service should be measured by the progress individuals make – from their baselines upon arrival toward goals in areas of their lives identified as priorities for them.

Refugee Action has embedded a tool in our Personal Integration Plan for refugee resettlement, for measuring baselines upon arrival and progress toward them over the course of our support. We believe a similar approach should be adopted more widely; and we will be happy to share our learning on this with the Government as it develops its plans.

Recommendations on refugee integration:

Drawing on our experience of working with resettled refugees, people who are in the asylum system or have gained refugee status through the asylum process, we have numerous suggestions for how the Government can ensure a successful approach towards the integration of all refugees in Britain.

To summarise our recommendations detailed above, we believe the Government must:

- Expand its **employment support** to all refugees and develop a fully **resourced, tailored approach**, incorporating the following elements:
 - Group courses on entering the jobs market
 - Employment casework
 - Volunteer employment mentoring
 - Employer engagement
 - Business start-up
- End the **benefit cap**; or at minimum provide additional funding to refugees and others to remove the threat of poverty and homelessness.
- Identify **practical solutions** to the many problems experienced by refugees and others with **Universal Credit**.
- Extend the 'move on' period to **50 days**.
- Ensure the design of **future refugee resettlement** programmes maximises integration (in line with separate, detailed Refugee Action recommendations)
- Make **decisions** on asylum applications far more **quickly**, and achieve the **targets** it sets for the time taken to make decisions.
- Allow asylum seekers and their adult dependants the **right to work**, unconstrained by the shortage occupation list, after **six months** of having lodged an asylum claim.
- Consult with **experienced partners** in the third sector to develop its approach to **voluntary return**.
- Amend the **eligibility criteria** for refugee **family reunion** to expand the definition of 'family member'
- Make available **legal aid** for refugee family reunion applications.
- Agree an approach to **measure success** in an integration programme for refugees, including measuring the progress individuals make from their baselines upon arrival towards agreed individual goals.
- Ensure that all responses to integration challenges are tailored to the **local level**, with area-specific interventions that include **consultations** with established communities.

5. Conclusions and recommendations

People from refugee backgrounds want to be financially independent and rebuild their lives, yet face significant barriers in doing so. Refugees come to Britain having fled violence, persecution and torture. Their wellbeing, confidence and mental health is often fragile as they navigate complex systems in a new country while dealing with trauma, far from networks and loved ones. Many suffer acute healthcare issues. Limited understanding of UK systems, and a lack of support to navigate them, further exacerbates many of these problems.

Effective integration support made available to all refugees in Britain, and tailored to the specific environment, can help those women, men and children to rebuild their lives here. It means that refugees can fully contribute their skills, talents and experience to the nation's economy, culture and communities, which is to everyone's benefit.

Conversely, insufficiently resourced, targeted or ambitious integration support leaves the odds stacked against refugees being able to fulfil their potential and contribute to their new homes. It can lead to people being left on the margins of society, unable to move forward with their lives and excluded from the Government's stated vision of being able to make the most of the opportunities which living in Britain offers. Furthermore, it risks damaging the cohesion of communities; missing opportunities for economic gains and instead creating additional costs to public funds in response to failed integration.

We are pleased that the Government has published its proposals in the Integrated Communities Strategy Green Paper, and several of the ideas and plans outlined are to be welcomed.

In particular, we applaud the Government's intention, as outlined in the Green Paper, to provide integration support to all refugees. Through almost 40 years of working with refugees and asylum seekers, we have observed at first hand the significant difference in integration support made available to people on the basis of their means of arrival in the UK – even if they've escaped precisely the same conflict or persecution; and fled from the very same street in Damascus or Mogadishu as one another; and also witnessed the difference this variance in support makes to people's integration prospects in Britain.

We look forward to closely working with ministers and officials in the Home Office and across government to share our insights and experience to help develop this laudable aim into concrete plans and action.

We have detailed in relevant sections of this written submission key areas we believe the Government needs to focus on to achieve its refugee integration goals, including the design of future refugee resettlement programmes; family reunion; and the benefits system.

Many of our proposals focus on employment support for refugees – an area in which Refugee Action has considerable experience and which, after English, is perhaps the most important element within a comprehensive and effective refugee integration programme. The status quo too often wastes talents, increases costs to the taxpayer, and creates risks to successful integration. We therefore recommend that the Government should:

- **Extend and fully resource tailored employment support to all refugees.**

While extending integration support for refugees who have gained status through the asylum route is both very welcome and much needed, we know that considerable damage is too often inflicted on individuals' integration prospects and wellbeing during the asylum process itself. We therefore recommend that the Government takes steps to improve people's

experience of the asylum process, so that those granted refugee status are better able to quickly progress their integration. These steps should include:

- **Make decisions on asylum applications far more quickly, and achieve the targets set for the time taken to make decisions.**
- **Allow asylum seekers and their adult dependants the right to work, unconstrained by the shortage occupation list, after six months of having lodged an asylum claim.**

Our experience also shows us that being able to speak English is the single most important step in refugees' integration, as the key which unlocks all other opportunities and pathways.

We welcome the Government's recognition of the crucial importance of English for refugees and others; and certainly, some of the Government's proposals on this theme – such as developing an ESOL strategy for England and a Centre of Excellence for ESOL – are very welcome initiatives which Refugee Action has long called for.

However, we are deeply concerned and disappointed that the warm words are not matched by badly needed funding commitments. The Government has chosen to ignore all available evidence and strong public and parliamentary support, and made no new funding commitments for ESOL. This is despite real term cuts of 60% in recent years, resulting in refugees being locked out learning for months and in many cases years, unable to rebuild their lives and begin to integrate in and contribute to their new communities.

This is a huge missed opportunity; one which we hope and expect that the Government will quickly correct; and in doing so, begin to view ESOL as the sound and necessary investment that it is.

We believe the Government must:

- **Create a fund to allow all refugees to receive a minimum eight hours a week formal, accredited English language teaching for their first two years in the UK, starting from within a month of their arrival in the country.**
- **Develop initiatives and provide funding to help all refugee women overcome the additional barriers they experience to learning English.**
- **Establish an ESOL Centre for Excellence; and develop an ESOL strategy for England, as proposed in the Green Paper.**
- **Provide free English teaching to asylum seekers in England from the point of their asylum claim.**

6. References

- ⁱ All names used in this submission have been changed in order to protect the identities of the individuals.
- ⁱⁱ House of Commons Library, 2017 – ‘English Language Teaching For Refugees’. <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CDP-2017-0195>
- ⁱⁱⁱ Refugee Action, 2016 – ‘Let Refugees Learn’. <https://www.refugee-action.org.uk/wp-content/uploads/2016/11/letrefugeeslearnfullreport.pdf>
- ^{iv} Refugee Action, 2017 – ‘Locked Out Of Learning’. https://www.refugee-action.org.uk/wp-content/uploads/2017/02/Locked_out_of_learning_briefing_paper_February_2017.pdf
- ^v Refugee Action, 2017 – ‘Safe But Alone’. <https://www.refugee-action.org.uk/wp-content/uploads/2017/10/Safe-but-Alone-final.pdf>
- ^{vi} Of the 71 ESOL providers surveyed, 53 were Ofsted-inspected. The Ofsted-inspected providers accounted for 92% of the learner numbers.
- ^{vii} MHCLG, 2016 – ‘The Casey Review: a review into opportunity and integration’. <https://www.gov.uk/government/publications/the-casey-review-a-review-into-opportunity-and-integration>
- ^{viii} House of Lords, 2017 – ‘Select Committee on Citizenship and Civic Engagement - Oral Evidence Volume’. <https://www.parliament.uk/documents/lords-committees/Citizenship-civic-engagement/Oral-Evidence-Volume.pdf>
- ^{ix} BBC News, 2018. <http://www.bbc.co.uk/news/uk-politics-43370514>
- ^x UNHCR, 2017 - ‘Towards Integration’. <http://www.unhcr.org/uk/5a0ae9e84.pdf>
- ^{xi} All Party Parliamentary Group on Refugees, 2017 – ‘Refugees Welcome?’ https://www.refugeecouncil.org.uk/assets/0004/0316/APPG_on_Refugees_-_Refugees_Welcome_report.pdf
- ^{xii} All Party Parliamentary Group on Social Integration, 2017 – ‘Interim Report Into Integration of immigrants’, ‘Integration Not Demonisation’. <https://www.socialintegrationappg.org.uk/reports>
- ^{xiii} See iv
- ^{xiv} Home Office, 2016 – ‘First anniversary of government commitment to resettle 20,000 Syrian refugees’. <https://www.gov.uk/government/news/first-anniversary-of-government-commitment-to-resettle-20000-syrian-refugees>
- ^{xv} Home Office, 2017 – ‘UK resettlement programmes: funding instruction 2017 to 2018’. <https://www.gov.uk/government/publications/uk-resettlement-programmes-funding-instruction-2017-to-2018>
- ^{xvi} *ibid*
- ^{xvii} House of Lords Select Committee on Citizenship and Civic Engagement, 2018 – ‘The Ties that Bind: Citizenship and Civic Engagement in the 21st Century’. <https://publications.parliament.uk/pa/ld201719/ldselect/ldcitizen/118/118.pdf>
- ^{xviii} House of Commons, 2018 – ‘Asylum: English Language: Written question – 136503’. <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2018-04-18/136503/>
- ^{xix} House of Commons Work and Pension Committee, 2017 – ‘Written Evidence Submitted by Refugee Action (UCR0140)’. <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/work-and-pensions-committee/universal-credit-rollout/written/71549.pdf>
- ^{xx} British Red Cross, 2014 – ‘The Move-On Period: An Ordeal For New Refugees’. <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/improving-the-lives-of-refugees/refugee-move-on-period>
- ^{xxi} Refugee Council, 2016 – ‘England’s Forgotten Refugees’. https://www.refugeecouncil.org.uk/assets/0003/7935/England_s_Forgotten_Refugees_final.pdf
- ^{xxii} See ix
- ^{xxiii} Refugee Action, 2018 – ‘Future of Resettlement’, unpublished paper
- ^{xxiv} Scottish Government, 2018 – ‘New Scots Refugee Integration Strategy’. <http://www.gov.scot/Resource/0053/00530097.pdf>
- ^{xxv} Home Office, 2018 – ‘Immigration statistics, October to December 2017 second edition’. <https://www.gov.uk/government/publications/immigration-statistics-october-to-december-2017/how-many-people-do-we-grant-asylum-or-protection-to#asylum-applications-and-initial-decisions>

-
- ^{xxvi} J. Hainmueller, D. Hangartner and D. Lawrence, 2016 – ‘When lives are put on hold: Lengthy asylum processes decrease employment among refugees’. *Science Advances*, 2:8, <http://advances.sciencemag.org/content/2/8/e1600432>
- ^{xxvii} J. Phillimore, E. Ergun, L. Goodson and D. Hennessy, 2007 – ‘They do not understand the problem I have’. *Refugee wellbeing and mental health*, Centre for Urban and Regional Studies, Birmingham New Communities Network and Community Resource and Information Service (Birmingham)
- ^{xxviii} C. Gorst-Unsworth and E. Goldenberg, 1998 – ‘Psychological Sequelae of Torture and Organised Violence Suffered by Refugees from Iraq’ *Medical Foundation Series*, available at: <https://www.freedomfromtorture.org/sites/default>
- ^{xxix} Lancashire County Council, 2017 – ‘Health needs assessment of asylum seekers and refugees in Lancashire’. http://www.lancashire.gov.uk/media/902306/hna_asylum-seekers-and-refugees_lancashire.pdf
- ^{xxx} C. J. Laban, H. B. P. E. Gernaat, I. H. Komproe, B. A. Schreuders and J. T. V. M. De Jong, 2004 - ‘Impact of a Long Asylum Procedure on the Prevalence of Psychiatric Disorders in Iraqi Asylum Seekers in The Netherlands’. https://journals.lww.com/jonmd/Abstract/2004/12000/Impact_of_a_Long_Asylum_Procedure_on_the.7.aspx/null
- ^{xxxi} Refugee Action, 2018 – ‘Waiting in the Dark’. <https://www.refugee-action.org.uk/wp-content/uploads/2018/05/Waiting-in-the-Dark-A4-16-May-2018.pdf>
- ^{xxxii} House of Commons, 2017 – ‘Asylum: Employment: Written question – 116874’. <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2017-11-30/116874/>
- ^{xxxiii} Home Office, 2004 – ‘Indicators of Integration’. <http://webarchive.nationalarchives.gov.uk/20110218141321/http://rds.homeoffice.gov.uk/rds/pdfs04/dpr28.pdf>