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PROVIDING ACCOMMODATION FOR REFUSED ASYLUM SEEKERS IN WALES

A FEASIBILITY STUDY COMMISSIONED BY THE WELSH
GOVERNMENT

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Note from the authors

We would like to thank all who have been involved with and supported this feasibility study, in particular John Davies and team in the Welsh Government, members of the Sounding Board and others who helped with the research. We are grateful to the busy front-line organisations who shared their expertise and especially to the refugees and refused asylum seekers who are using, or have used, their services and were prepared to talk to us about their experience of destitution.

The research was predominantly undertaken and included in this report between February 2019 and July 2019. Since then some key developments within a number of the organisations involved have been incorporated. However, full updating of all aspects of the research has not been undertaken. The policy and legislation appendix (Appendix 3) is accurate as at July 2019.

Any errors in this report are the responsibility of the authors.

1. BACKGROUND

1.1. About this feasibility study

The Welsh Government (WG) launched its Nation of Sanctuary Plan in January 2019. One of its objectives is to mitigate destitution amongst asylum seekers. Refused asylum seekers have no recourse to public funds (NRPF), unless they meet certain conditions, such as submission of a fresh claim. Without means to live and the stability and security of a place to stay, it is difficult to avoid, or exit, destitution.

Box 1: Definition of asylum seeker

An **asylum seeker** is a person fleeing persecution in his or her homeland, has arrived in another country, made themselves known to the authorities, has exercised their legal right to claim asylum and is awaiting the outcome of their asylum claim. Under the 1951 United National Convention relating to the Status of Refugees, a **refugee** is a person who *'owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group, or political opinion, is outside the country of his nationality and is unable to, or, owing to such fear, is unwilling to avail himself of the protection of that country'*.

The UK Government recognises an asylum seeker as a refugee when they satisfy the above definition. Within the Welsh Government Nation of Sanctuary Plan, the term 'refugee' also includes individuals not recognised as refugees but who have been granted indefinite leave to remain, offered humanitarian protection, or provided with discretionary leave following their asylum claim.

Box 2: Definition of No Recourse to Public Funds (NRPF)

No Recourse to Public Funds (NRPF) is a term used to cover people who because of their immigration status (or lack of it) cannot access mainstream housing or benefits. 'Public funds' comes from the Immigration Rules¹, which specifies the benefits and services that some migrants cannot use if they need leave to enter, or as a condition of giving them leave to remain. Funds specified include most means-tested and disability benefits, access to council waiting lists and homelessness assistance and child benefit. Most other money derived from public funds which is used to support people subject to immigration controls does not currently fall within the definition of 'public funds' used for immigration purposes. This includes the Social Services and Well Being Act in Wales, which is used by Local Authorities to prevent destitution of children and their parents as well as vulnerable adults and young people formerly looked after by a local authority (subject to Human Rights Assessments being undertaken in the cases of most people who have sought asylum).²

Typically, migrants coming to the UK (to work, study, join family members or visit) may have an immigration status that demands that they support themselves 'without recourse to public funds'. However, the term is also used to cover people who have no status or are waiting for a decision. Migrants who apply to stay on the basis of long residence or family life are usually barred from recourse to public funds but may apply to have the condition lifted if they are destitute (this is what is meant by 'lifting the NRPF condition'). EU migrants may face similar problems if they are deemed not to have a 'right to reside'. While asylum seekers are at least, initially, entitled to support, destitution can occur because of errors, delays or poor decision-making. Some refused asylum seekers hoping to

¹ Paragraph 6 of these Rules defines the benefits and services covered, but the bar on access to housing and benefits is written into the eligibility criteria.

² Welsh Refugee Coalition and Welsh Government [Access to social services and other care and support for destitute asylum seekers with no recourse to public funds](#) note published in February 2020.

reopen their claims for asylum can get emergency (Section 4) support subject to conditions but may not want it or not be able to manage the application process.

The WG commissioned this feasibility study to explore ways of increasing accommodation options available to refused asylum seekers who may be able to challenge a negative decision on their asylum claim or have grounds for a fresh claim, but need stability to facilitate access to, and engagement with, immigration advice to identify a pathway out of destitution.

A key objective of the work was to consider how accommodation models operating in Wales and in other places can be further developed and/or replicated.

The first output from the work, produced in April 2019, was a draft framework document which identified seven types of accommodation used in different places across the UK. This was discussed with the project Sounding Board (see Appendix 1 for Sounding Board members).

A summary of the framework document outlining the seven models was used to consult more widely with other public and voluntary sector players and with people seeking sanctuary in Wales. A full list of interviews and consultation events is provided in Appendix 2.

Relevant legislation and guidance was examined so as to assess barriers and opportunities specific to developing accommodation options in Wales. This was done in the context of increasing divergence in policy and practice from England in devolved areas such as housing and social care.

1.2. About this report

This report sets out the policy context for the feasibility study, findings and recommendations for exploring accommodation models which we believe could be further developed and/or established in Wales. Terminology used in this report is explained in Appendix 4.

The report also identifies significant policy and practice differences between devolved nations around housing and social care which are presented in Appendix 3.

Information about accommodation models in place in different parts of the United Kingdom draws substantially on work which is available on the Homeless Link³ and NACCOM⁴ websites. NACCOM is the UK-wide umbrella body for organisations providing accommodation to refused asylum seekers and other destitute migrants; it leads the development of best practice in the accommodation of destitute migrants and campaigns for an end to destitution amongst asylum seekers. Appendix 5 outlines the role of some of the organisations, (most of which are NACCOM members), which have pioneered accommodation models for refused asylum seekers and other migrants with NRPF and some information about the type of accommodation they provide. The appendix updates information collated from other relevant reports^{5,6,7}

We are grateful to the Welsh Refugee Coalition for their work which scoped causes, impact and routes out of destitution (see Section 3) and did some initial mapping of services including

³ <https://www.homeless.org.uk/our-work/national-projects/strategic-alliance-on-migrant-destitution>

⁴ <https://naccom.org.uk/resources/>

⁵ Petch H., Perry J. & Lukes S. (2015) [How to Improve Support and Services for Destitute Migrants](#) JRF

⁶ Hutton C., & Lukes S. (2015) [Models of Accommodation and Support for Destitute Migrants: A resource for organisations and groups who want to get involved.](#) A report for Housing Justice, NACCOM & Praxis

⁷ Hutton C., Lukes S., & Petch H. (2019) [Housing destitute migrants: Lessons from a pilot project.](#) Commonweal Housing & Praxis Community Projects

accommodation services (see Section 4)⁸. The Coalition's Options Appraisal did not list specific legal firms or advice bodies able to undertake representation for asylum seekers whose cases have been refused, but the Welsh Government reports there is an extremely limited number. In 2020/21, the WG will commission a scoping study to better understand the gaps in immigration legal advice and identify where it can support improved access and provision.

The summary and conclusions section of this report contains recommendations to support development of existing accommodation provision, mainly in Cardiff and Swansea, and establishment of new models in these and other dispersal locations including Newport and Wrexham. There is an emphasis in the recommendations on partnership working and prioritisation of work that can deliver most bedspaces for refused asylum seekers most quickly. They also embed an holistic approach, including crucial access to immigration advocacy, advice and representation.

⁸ British Red Cross, Welsh Refugee Council, ShareDYDD and Asylum Matters (2017) Options appraisal paper on behalf of the Welsh Refugee Coalition, subsequently followed by proposals paper and update.

2. POLICY CONTEXT

2.1. The policy context in Wales: Nation of Sanctuary

Launched in January 2019, following consultation during 2018, the Nation of Sanctuary Plan⁹ outlines cross-Government actions dedicated to improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity, (where this is possible within UK Immigration law), and promoting good relations between groups. The Plan also prioritises key issues which were highlighted by refugees and asylum seekers during the Plan's development and in response to the National Assembly's Equality, Local Government and Communities Committee Inquiry in 2017, aiming to ensure that:

- Refugees and asylum seekers can access health services (including mental health services) throughout the 'asylum journey';
- Refugees and asylum seekers are provided with the information and advice they need to begin to integrate into Welsh society from day one;
- Asylum seekers are not prevented from accessing appropriate Welsh Government schemes which would support their integration;
- New refugees and asylum seekers are less likely to fall into destitution;
- All refugees and asylum seekers, (particularly unaccompanied asylum-seeking children), are properly safeguarded and can access advocacy support;
- Refugees and asylum seekers can access educational opportunities, including language skills, to help them rebuild their lives and fulfil their potential.

The actions proposed are aligned with and closely linked to:

- The themes and priorities of *Prosperity for All: the National Strategy for Wales*¹⁰;
- The goals of the *Well-being of Future Generations (Wales) Act 2015*¹¹;
- The Welsh Government's *Strategic Equality Plan 2016-2020*¹².

'People seeking sanctuary' is the term used in the Nation of Sanctuary plan for both asylum seekers and refugees. The plan assumes that integration starts from day one of the asylum journey in the UK and is underpinned by the five ways of working set out in the Well-Being of Future Generations (Wales) Act 2015 (long-term, prevention, integration, collaboration and involvement). The Plan:

- Was developed with and promotes **the involvement of people seeking sanctuary**;
- **Promotes holistic support** which recognises the two-way nature of integration and the assets people seeking sanctuary bring to Wales;
- **Seeks to prevent the most harmful problems** that result from fleeing persecution and going through the UK Government's asylum process including mental health problems, homelessness, exploitation (including trafficking) and destitution;
- Is **long-term** in its vision of Wales as a nation of sanctuary;

⁹ [Nation of Sanctuary - Refugee and Asylum Seeker Plan, January 2019](#)

¹⁰ <https://beta.gov.wales/sites/default/files/publications/2017-10/prosperity-for-all-the-national-strategy.pdf>

¹¹ <https://gov.wales/topics/people-and-communities/people/future-generations-act/?lang=en>

¹² <https://gov.wales/topics/people-and-communities/equality-diversity/?lang=en>

- Is **person-centred** in approach, recognising that people come from different backgrounds and cultures;
- Is **collaborative** drawing on other organisations both public and private to engage in its delivery.

2.2. UK Government Policy

The Welsh Government states clearly that it cannot contravene UK law and must act within the confines of its competency, given the current devolution settlement. Immigration is a reserved policy area and, over the past three decades, there has been a trend to narrow eligibility for protection and UK citizenship including:

- A number of legislative changes which have increased the risk of destitution for many asylum seekers;
- Changes to access to benefits and the granting of right to remain in the UK but with an NRPF condition attached;
- Legislative and policy changes to promote a hostile environment including limiting access to employment, health care and to renting accommodation (although the latter are not currently applied in Wales).

Despite some recent relaxation in 'hostile environment' policy pronouncements following the Windrush controversy, immigration and asylum policy and its implementation, as well as other policy areas, can be a cause of temporary or longer term destitution and continues to have a detrimental impact on those seeking asylum including:

- Weaknesses in asylum processes – a significant proportion of negative decisions are overturned on appeal;
- Restrictions in legal aid which have resulted in reducing availability of good quality immigration advice (N.B. even though advice on asylum claims remain in scope, the fees payable are limited);
- Universal Credit waiting times exacerbate difficulties for newly recognised 'refugees' during the 28 day 'transition period.'

In summary: In the Nation of Sanctuary Plan, the Welsh Government has pledged positive measures to support integration of people seeking sanctuary in Wales and to mitigate destitution. However, the legislative and policy context for this aspiration is complex, involving policy areas that are devolved and those that are reserved to the UK Government where influence over policy is severely limited. Nonetheless the Plan is very helpful in setting out areas on which the Welsh Government is going to be taking work forward.

3. SCOPE AND SCALE

3.1. Scope and terminology

The focus of this feasibility study is on accommodating refused asylum seekers with no recourse to public funds (NRPF). There are significant numbers of other groups of migrants with NRPF, particularly from the EU; this study does not address the issues faced by these groups or their accommodation needs.

Definitions of ‘asylum seeker and refugee’ and ‘NRPF’ are set out in Boxes 1 and 2 in Section 1.1. Appendix 4 outlines some of the other key terms and how we have used them in the report.

Most asylum-seeking families whose claims have been refused who had children under 18 at the time of their refusal will continue to be supported financially and accommodated in Home Office contracted provision. Some single people who have been refused asylum may be eligible to ‘Section 4 support’ (see Appendix 4) if they can demonstrate that they would otherwise be destitute. For the purposes of Section 4, a person is ‘destitute’ if they do not have adequate accommodation or do not have enough money to meet essential living expenses for themselves and any dependants. Applicants also need to demonstrate that their circumstances meet one of a number of criteria, including that there are specific barriers to their return.

Rising numbers of people residing in the UK with inadequate means to live without handouts led the Joseph Rowntree Foundation (JRF) to undertake research to define ‘destitution’ and attempt to enumerate the numbers of people in the UK who are destitute at any one point at in time. The Welsh Refugee Coalition have used this JRF definition in its work to develop models of support. The JRF definition encompasses people who ‘cannot afford to buy the essentials to eat, stay warm and dry, and keep clean’.¹³

3.2. Scale of destitution in Wales

No robust data is available to precisely determine the scale of destitution in Wales. Most refused asylum seekers are likely to be hidden, staying with people within refugee communities, possibly friends or relatives, but also potentially in exploitative circumstances.

The Welsh Refugee Coalition suggests that several hundred asylum seekers are likely to become destitute annually.

The British Red Cross has been developing more consistent ways of recording and analysing data, although it has not yet put together a Wales wide picture. Data from the Cardiff Destitution Clinic since it started an improved system of monitoring identified records of 69 people who were homeless or with no fixed abode between 24 September 2018 and 8 April 2019.

‘Most of these we see for many weeks returning to the drop in so, on average, we have 8 people per week who describe themselves as homeless or with no fixed abode – the highest number we have recorded in a given week is 14.’

Breaking down estimates from the 2018 UK wide study of destitution commissioned by JRF, it is estimated that there were 7,350 asylum seekers in Wales seeking advice or aid from the

¹³ Fitzpatrick S. et al. (2018) [Destitution in the UK 2018](#) JRF

voluntary sector over the year of the study and, of these, 5,300 were destitute¹⁴. There is no data about the length of time people experience destitution, but accommodation providers report that some cases can take one, sometimes two and, in a small number of cases, even three years or more to resolve.

3.3. When does destitution occur?

The Welsh Refugee Coalition options appraisal work⁸ identified the various stages in the asylum process when destitution can occur:

- Pre-asylum claim;
- During an asylum claim (e.g. reliance on Section 98/Section 95 support);
- Refused asylum claims (e.g. reliance on charitable, Section 4 or local authority support - and where this feasibility study is focused);
- On the granting of refugee or other status (e.g. transition to mainstream entitlements/ barriers from NRPF conditions).

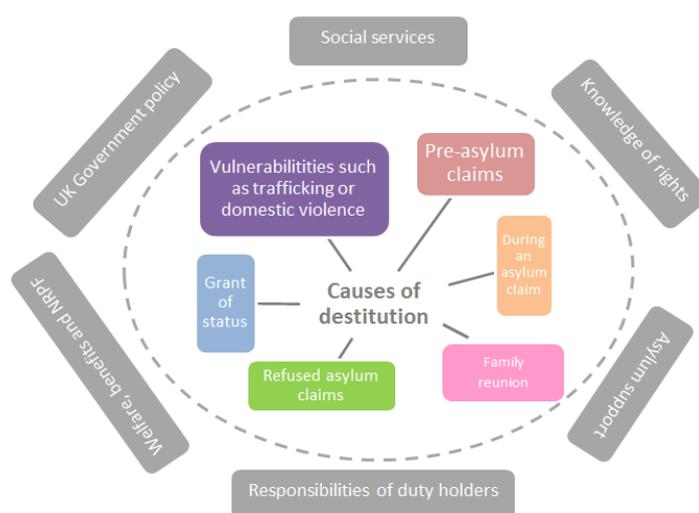
Vulnerability across any of the above can be critical (e.g. due to trafficking, domestic circumstances, mental or physical health).

The Coalition broke down destitution of refused asylum seekers and others seeking sanctuary into a pathway spanning:

1. *Causes of destitution*
2. *Direct impact of destitution*
3. *Routes out of destitution*

Diagrams were developed by the Coalition outlining each step on the pathway so as to facilitate the development of models which build on existing support and create the most effective response.

Fig 1. Causes of Destitution (from Welsh Refugee Coalition Options Appraisal, 2017⁸)



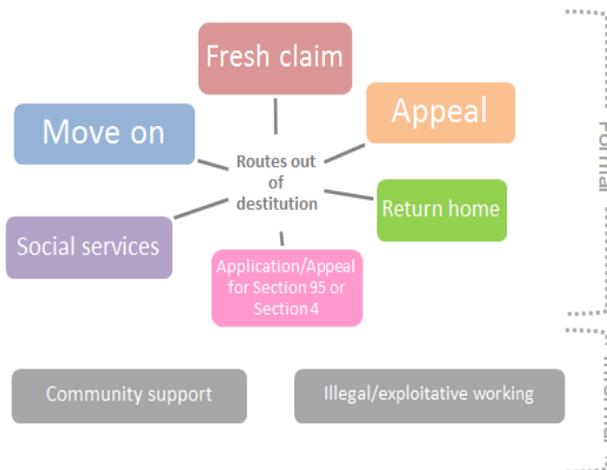
¹⁴ Personal communication in July 2019 with Professor Glen Bramley a co-author of the JRF 2018 study

Fig 2. Direct impact of destitution (from Welsh Refugee Coalition Options Appraisal, 2017⁸)



3.4. Routes out of destitution

Fig 3. Routes out of destitution (Welsh Refugee Coalition Options Appraisal, 2017⁸)



Routes out of destitution require an holistic package of support for refused asylum seekers and inputs needed in addition to accommodation are explored in this report, including:

- Support for basic needs either through goods in kind, food, toiletries etc and/or cash¹⁵;
- Support for travel to engage with their case, but also meaningful activities which create healthier hosting and shared housing environments;
- Immigration advice, advocacy and representation (see Clayton study for relevant models)¹⁶.

¹⁵ Note that the Welsh Government Discretionary Assistance Fund can cover some emergency essentials but does not provide cash.

¹⁶ Clayton G. (2015) [Models of immigration advice, advocacy and representation for destitute migrants focusing on refused asylum seekers](#) NACCOM

In summary: There is no robust data for the number of refused asylum seekers who are destitute and definitions of destitution vary. Most refused asylum seeker families will continue to receive support from the UK Government, but for single people, provision is extremely limited. Single refused asylum seekers will be NRPF, unable to work and without a secure place to stay. On the basis of their experience of asylum and refugee support services, the Welsh Refugee Coalition believe that several hundred refused asylum seekers become destitute annually. In Cardiff alone, improved British Red Cross monitoring of users of the Destitution Clinic identified 69 destitute refused asylum seekers in a (just over) six-month period. The 2018 JRF destitution study suggests that over 5,000 asylum seekers were destitute in Wales at the time of their study.

The Welsh Refugee Coalition has identified that people become destitute at various stages of the asylum process and, in order to find a route out of destitution, need to have basic needs, such as accommodation, met, as well as access to immigration advice. This study is focused on the needs of asylum seekers who have been refused, some of whom may have exhausted their appeal rights ('appeal rights exhausted'), but have grounds for a fresh claim and others who may still be able to appeal a negative decision.

4. ACCOMMODATION MODELS FOR REFUSED ASYLUM SEEKERS

4.1. Role of accommodation in supporting routes out of destitution

Accommodation plays a critical role in providing a period of stability, safety and security during which people seeking sanctuary can take steps towards a route out of destitution. This Section of the report outlines the different models currently being used for refused asylum seekers in Wales and other parts of the UK. Appendix 5 outlines the role and provision of specific accommodation providers, and includes information about their approach to the whole package of advice and support needed.

This Section of the report also includes information on safeguarding and on immigration information and advice.

4.2. The legal position

A 2015 Counsel's opinion¹⁷ outlined the UK wide legal position and concluded that there are few legal obstacles to supporting any of the sorts of schemes for migrants with NRPF that are outlined in this section of the report. The following legal points identified in the opinion remain valid:

- Helping migrants with NRPF, including with their accommodation needs, is legal unless the provision is specifically excluded within the Immigration Rules which prescribe the meaning of NRPF;
- The rules exclude access to housing provision via Part 2 of the Housing (Wales) Act 2014 (and equivalent provisions in England and the other devolved nations). People with NRPF cannot be accommodated in council housing or be placed on the register or waiting list for council housing. Provision of information and signposting by housing options and homelessness advice services is not, however, a public fund;
- Housing association provision which is not allocated via a council run housing register is **not** excluded;
- The main issue is ensuring schemes are not caught up in problems arising from landlord checks required by the Immigration Act 2014 (Right to Rent will not be rolled out to Wales in the foreseeable future).

We have researched the legislative and policy differences between England and Wales for this study (see Appendix 3) and refer to these in exploring development opportunities in Wales in our recommendations.

The Housing Rights website hosted and updated by the Chartered Institute of Housing, (the UK wide housing professional body), provides information about housing rights and immigration that can be accessed by housing advisers and migrants themselves.¹⁸

In response to the exceptional circumstances created by the Coronavirus pandemic, funding has been allocated by the Welsh Government to local authorities in order to secure accommodation

¹⁷[Legal Opinion from Adrian Berry, Garden Chambers](#) for the Association of Charitable Foundations and Joseph Rowntree Foundation, 2015

¹⁸ <https://www.housing-rights.info/index.php>

for those sleeping rough and people living in inadequate temporary accommodation and this can be used to support people who are NRPF.

4.3. The models: overview and issues

According to NACCOM⁴, different forms of accommodation for refused asylum seekers have developed apace across the UK over the past decade. The seven models researched for the framework developed as part of this study are mainly based on the activities of organisations accommodating refused asylum seekers in dispersal areas in England, as well as those working with a wider group of migrants with NRPF, including asylum seekers, particularly in London.

Whatever the form of housing provided, a support package is required which includes advocacy to help refused asylum seekers engage with their immigration case, as well as other practical and emotional support, all underpinned by robust safeguarding. This holistic package usually relies on effective partnerships and is likely to be more challenging when accommodation is provided through informal routes. The length of time for which such support will be required is also unpredictable as it is dependent on how long asylum and immigration cases take to resolve. Some types of cases, e.g. where proof of nationality is needed, may take a long time. Good advice and efficient Section 4 application processes could speed up some cases as the Welsh Refugee Council have found recently. However, as noted in the previous Section of this report, there is no robust data on length of time for which refused asylum seekers are destitute.

An overview of the seven models of accommodation for refused asylum seekers identified is set out below, along with issues that arise for each model. Useful guidance about accommodation and support services for destitute migrants, (including refused asylum seekers), is provided on the Strategic Alliance on Migrant Destitution sections of the Homeless Link website³ and also on the NACCOM website⁴. These organisations jointly published a hosting toolkit in 2017¹⁹ and, in October 2019, NACCOM published a housing toolkit.²⁰ A study of immigration advice models was published alongside the earlier housing focused reports¹⁶.

4.4. Informal arrangements: overview

Most refused asylum seekers appear to be staying with friends, relatives, community members or other contacts.

Informal arrangements: issues

- These arrangements can be a good option for some people, but can put people at risk of exploitation, either on an individual or more organised basis involving exploitation which could be defined as trafficking.
- The willingness of contacts to help may be exhausted before immigration issues are resolved and many asylum and refugee community members may themselves be struggling to make ends meet.

4.5. Hosting: overview

Volunteer hosts provide accommodation to guests who are refused asylum seekers. Usually a support organisation provides matching and training services, ensures effective safeguarding policy and practice and organises support and links to immigration advice.

¹⁹ <https://naccomm.org.uk/hostingtoolkit/>

²⁰ https://naccomm.org.uk/wp-content/uploads/2019/10/NACCOM-HousingToolkit_FINAL.pdf

Hosting: issues

- Hosting does not lend itself to long-term placements, although these may be mutually agreed once hosts and guests get to know each other.
- Some people do not wish to be a guest in someone's home and, in other cases, the needs and history of individual asylum seekers makes a hosting placement too risky.
- Hosting needs continual promotion to maintain a sufficient pool of hosts.
- Effective systems for safeguarding hosts, their families, (potentially including children), and guests are needed, including risk assessments as part of guest referral and host recruitment and regular review of these (see Section 4.12 for more detail on safeguarding).
- Management of the needs and expectations of both hosts and guests is vital, for example, around house 'rules' covering guests and visitors, use of whole house etc.
- Many hosting schemes have started off on an entirely voluntary basis, but NACCOM's hosting toolkit concludes that the most effective schemes need paid staff to recruit hosts, match and support guests and hosts, ensure safeguarding measures are effectively put in place and that guests are linked to other services, including immigration advice.

4.6. Shared houses for refused asylum seekers: overview

Refused asylum seekers are accommodated in shared houses with wraparound support and links to immigration advice. Housing is obtained from housing associations (HAs), churches, faith groups and philanthropic individuals often at a peppercorn rent. At the time of researching this report, Home4U in Cardiff provided bedspaces and support to four male refused asylum seekers in a house owned by the Roman Catholic Diocese. Prior to finalising the report, the Diocesan property had to be handed back, but Wales and West Housing Association has donated two 2-bed properties for a rent free period of time to enable this provision to continue (see Section 5). Hope Projects²¹ in Birmingham has 10 houses, seven of which are donated by four very different types of HAs (Midland Heart, Friendship HA, Bournville Village Housing Trust and Clarion). The DASS Project²² in Scotland has four two-bed properties but has to fundraise for rent for some of these.

Shared houses: issues

- How properties are obtained/procured.
- How allocations are carried out and by which organisation.
- The mix of people in any house.
- How support/management is provided for sharing arrangements and who does this.
- Whether exemption from Local Housing Allowance rate Housing Benefit restrictions can be obtained through one of the four specified provisions (see Appendix 3 on 'exempt/specified accommodation').
- The need for effective property maintenance and 'tenancy' management and who does this.
- The standard/condition of properties, for example, big old vicarages or manses may be expensive to heat, but also whether 'Welsh Housing Quality Standard' (WHQS) should apply, the costs of which could make this and the model outlined below in Section 4.7 prohibitive.²³

²¹ <https://naccom.org.uk/members/hope-projects-west-midlands/>

²² <https://naccom.org.uk/members/dass-project/>

²³ N.B. WHQS would not apply to properties such as manses and vicarages.

- Whether properties need to be registered as a House of Multiple Occupation (see Appendix 4).
- The length of time for which properties are available and notice periods for owners wanting them back, (a particular issue for properties that are donated and which can make planning and sustainability difficult).
- The need for clear, potentially formal, agreements between all organisations involved.

Useful references on these issues include The *Models of Accommodation* report by Hutton & Lukes, 2015⁶ and the JRF report published in 2015 by Petch, Perry & Lukes⁵.

A partnership with an established housing provider is one way to deal with some of the above issues, for example, the Boaz Trust has a partnership with Arawak Walton Housing Association to provide housing management including rent collection, repairs and maintenance, gas and electricity safety checks etc.

4.7. Shared houses for both refused asylum seekers and paying residents: overview

This model includes other residents who can pay rent who are accommodated alongside refused asylum seekers. Houses are obtained as above, but there is also increasing use of the private sector through various leasing arrangements and also of property purchase, sometimes with social investment, including from HAs via their asset disposal schemes. Most of the organisations that operate this model are members of NACCOM⁴. Examples include Action Foundation²⁴, Boaz Trust²⁵ and Praxis²⁶. The financial models of both Praxis and Action Foundation are available in a recent evaluation⁷. Action Foundation's business model includes some Supporting People funding and exemptions on Local Housing Allowance limits which enables higher charges to be made which are eligible for Housing Benefit (HB). Praxis' income is derived from fees paid by local authorities for housing and support of destitute migrant families who live alongside single female residents with NRPF. Some models involving leasing from and/or access to the private sector might be described as social lettings.

The model of providing shared housing both for renters and migrants with NRPF has been referred to as a 'cross-subsidy' model. However, the recent evaluation of the Praxis Commonweal pilot argued that cross-subsidy is too narrow a description of the model and could create some difficulties for and/or with commissioners of services. A form of social enterprise is proposed as a better description, with a business model designed to achieve a number of different outcomes and potentially for different groups of people.

Shared houses for both refused asylum seekers and paying residents: issues

As above, (in 4.6.), and in addition, and mainly because there are a mix of non-paying NRPF and paying residents:

- Whether non-paying and paying residents share the same house or are housed in different houses (different practices are outlined in Appendix 5) and issues that might arise if they share.
- Levels of rent and a business model which is sustainable in meeting tenancy obligations to those paying rent and the needs of refused asylum seekers.

²⁴ <https://naccomm.org.uk/members/action-foundation-3/>

²⁵ <https://naccomm.org.uk/members/boaz-trust/>

²⁶ <https://naccomm.org.uk/members/praxis-community-projects/>

- Whether the housing and support package provided would qualify as ‘exempt’ and/or ‘specified’ accommodation and therefore be excluded from Housing Benefit restrictions.
- If a high charge is made because of support included in the provision, making sure residents are not disadvantaged in entering employment and/or training and whether Supporting People funding might support the service (although note that Supporting People is no longer widely available in England).

4.8. Nightshelters and hostels: overview

A few shelters exist specifically for refused asylum seekers and other migrants with NRPF, including Glasgow Nightshelter and the Boaz shelter in Manchester, (an access point to other Boaz provision). Nightshelters for homeless people are usually free and, in England, mostly open to all. In London, over 60% of nightshelter users are non-UK born and over the last six years, the proportion of users who are non-EEA migrants was at least 18% and, in 2019, was 27%.²⁷

Increasingly, homelessness organisations have found ways of making free bedspaces available in hostels to migrants with NRPF, particularly in London. St Mungo’s has been proactive in putting underused spaces to use as free bedspaces, e.g. rooms that are smaller and have been used for storage or communal spaces that are not being used. St Mungo’s works in partnership with immigration advice providers such as Praxis to enable access to immigration advice.

Nightshelters and hostels: issues

- Many refused asylum seekers and their support workers report that shelters and hostels are culturally alien, often male-dominated environments, in which alcohol and drug addiction issues can be particularly challenging. ‘Dry’ provision which bars use of alcohol and drugs or specialist provision for destitute asylum seekers may be less alien.
- The short-term nature of nightshelters (and many hostels), their instability, (often people have to move to a new location every night), shared spaces and lack of trauma-informed environments means that much of this provision is not suitable for people who need stability to engage with immigration advice and may have experienced significant trauma in their lives.

4.9. Paying rent for a migrant to live in a house, hostel or B&B: overview

This is an emergency response used by some charities and foundations, e.g. the Zakat Foundation. The British Red Cross do this in Wrexham from time-to-time because there is no other accommodation available.

Accommodation might also be paid for by public bodies to fulfil their obligations to support children in need or vulnerable adults under relevant legislation, i.e. the Social Services and Well Being Act in Wales, which, in most cases involving asylum seekers, would also require a Human Rights Act assessment.

Paying rent for a migrant to live in a house, hostel or B&B: issues

- This is most appropriate as an emergency, short-term solution because it is costly if open-ended.

²⁷ Communication from Housing Justice on 12 June 2019. HJ coordinates London shelter provision

- Landlord checks mean this approach needs to be used with care (Right to Rent checks are not in place in Wales).

4.10. Other models

Shipping containers: overview

Shipping containers are starting to be used to house both paying residents and migrants with NRPF including in a new Salvation Army development in London. This form of accommodation has not been researched for this project but we thought it worthy of mention.

Communities: overview

There are a small number of examples of communities specifically set up to cater for destitute migrants along with other groups. An example is London Catholic Worker in London which has a large property shared by volunteers and destitute migrants. These schemes are rooted in a philosophy of sharing and mutual support. As yet, no asylum seeker/refugee led communities involved in alternative forms of living have been identified, but a group in Coventry - the Coventry Asylum and Refugee Action Group - are exploring ways in which they can engage in, and contribute to, housing schemes including for destitute migrants with NRPF.

4.11. About the providers

The groups that have been at the forefront of housing destitute migrants are predominantly, though not exclusively, faith based. Many, including the founding organisations of the UK wide NACCOM network, were formed specifically to accommodate and support refused asylum seekers in the early to mid-2000s when numbers in need were rising. Most started out as small, informal groupings and often hosting was their initial housing offer.

NACCOM members

Several NACCOM members have developed into medium-sized charities over the last five-10 years; mainly those providing shared housing and accommodating some residents who pay rent. The accommodation and related services provided by these organisations are outlined in Appendix 5. Some operate a range of different accommodation services; Boaz and Action Foundation for example have hosting schemes, as well as shared housing for paying refugees and NRPF asylum seekers. Boaz also run a nightshelter and Action Foundation are establishing an 'alternatives to detention' pilot which would bring in fees. Praxis bring in fees from local authorities for its service to destitute migrant families. Business models have been constructed which cover a proportion of free bedspaces, with ratios of between one free to three paid spaces and one to five. Open Door on Teesside has developed a social lettings model and, not only, procured housing with the private sector, but also purchased a few properties including a couple from a housing association. Action Foundation has also purchased at least one property using social investment and is seeking a more secure supply of housing and to develop its own asset base.

DASS Project in Scotland is different. It was established to end destitution through coordination of immigration advice, advocacy and representation in Glasgow, as well as providing services to meet basic needs, including shelter, which enabled people to engage with their immigration case.

Housing and homelessness organisations

Some homelessness organisations have become involved in providing accommodation for refused asylum seekers; see, for example, the outline of St Mungo's in Appendix 5.

Housing associations have been involved as partners to NACCOM members; Arawak Walton provides housing management services for Boaz Trust (see above); and many donate properties at a peppercorn rent or lease properties at an affordable rent. Hope Projects, which only accommodates refused asylum seekers gets seven of its 10 properties from four different housing associations. Arimathea, Boaz and Open Door have all secured several properties from local housing associations which they use for a mix of paying refugees and refused asylum seekers with NRPF.

It has been rare for housing associations to lead on this work although the Migrant Pledge^{28 29} which was developed by the London Black and Minority Ethnic (BME) Housing Network, has had some impact in increasing the awareness and action of BME-led and community based housing associations.

Metropolitan Thames Valley Housing (MTVH) is utilising some of the restricted funds of its Migration Foundation to resource innovation in provision for destitute migrants. MTVH:

- Funded some of the providers noted in this section of the report, as well as the NACCOM network;
- Is running a hostel for destitute migrants in Derby;
- Is developing provision for destitute migrant families paid for by the local authority under Section 17 of the Children Act which draws on the learning from the Praxis pilot in London (see above 'Shared Housing' and Appendix 5 for information about Praxis and Appendix 3 and Appendix 4 for equivalent provision in Wales).

4.12. Safeguarding

Safeguarding refugees and asylum seekers is a key strand of the Nation of Sanctuary Plan. Given their NRPF status, refused asylum seekers are at particular risk of exploitation and harm. Accommodating refused asylum seekers requires risk management to protect the safety and security of guests and hosts, as well as residents, staff and volunteers in other types of accommodation schemes.

Projects accommodating refused asylum seekers often start out as small, informal groupings operating with a high degree of trust. As these groups and organisations have grown and developed, their awareness about risk and actions taken have increased, including development of robust policies and procedures. There are models of best practice to draw on in the supported housing field, but less expertise relevant to hosting. Some organisations have used the experience of supported lodging arrangements and emergency hosting schemes for young people; De Paul Trust operates hosting schemes for young people for example.

²⁸ <https://www.insidehousing.co.uk/news/news/migrant-support-pledge-for-housing-associations-launched-49134>

²⁹ <https://bmenational.wordpress.com/2018/07/26/migrant-pledge/>

In 2017, a session was devoted to safeguarding at the NACCOM conference³⁰ drawing on the expertise of NACCOM member, Leeds Asylum Seeker Support Network (LASSN), which runs a range of services including a hosting project³¹. LASSN's approach incorporates:

- A shared commitment to promoting the welfare and security of all involved with services;
- Recognition of the possibility of abuse and clarity about reporting and action;
- Developing policy and procedures in line with local Safeguarding Boards' best practice and adapting appropriately³²;
- Risk assessment of recruitment (of hosts, volunteers and staff) and referral of guests and residents;
- Openness and a transparent culture in which people are encouraged to talk about concerns and problems;
- Regular (every two years) review of policies and practice, including risk assessment, as part of project evaluation, supervision and monitoring of patterns in reporting of concerns;
- DBS (Disclosure and Barring Service) checks as appropriate; checks should not be the only tool used. Note that asylum seekers per se are not defined as a vulnerable group in the legislation governing DBS checks. If projects do not accommodate children, it may not be legitimate to conduct a full ('enhanced') check on all hosts because they do not fit in to the criteria of 'care' that needs to be offered to qualify for a full ('enhanced') check. Some organisations can opt for basic checks (which only disclose unspent offences)³³;
- If there are children in the host household, there will be a need for specific child-focused management. DBS checks may not be revealing in the case of people who have not been in the UK for that long. It was reported that some projects use confidential police checking schemes as part of their risk assessment of guests, but we do not have any detail about the purpose and parameters of these.

4.13. Immigration advice, advocacy and representation

NACCOM encourages members to develop expertise or partnerships to achieve resolution of immigration cases so that as many people as possible can be helped to find a route out of destitution which accommodation alone cannot achieve. Work commissioned in 2015¹⁶ to support this goal identified the need for different types of input, not only good advice and representation, but also advocacy to support people to engage with and prepare their case. This is in the context that, even if the case qualifies for legal aid, this is a limited sum which does not resource solicitors to help people collate their evidence and not all solicitors are proactive in making sure people know this.

Hope Projects in Birmingham employs a Level 3 legal adviser/representative who used to work in the city's leading private provider of immigration advice. Moreover, Hope describes itself as a rights-based project rather than a housing provider. For this reason, Hope has not developed

³⁰ <https://www.dropbox.com/s/awftcqu01d7ux4f/Safeguarding%20NACCOM%202017.pdf?dl=0>

³¹ <https://lassn.org.uk/safeguarding/>

³² <https://law.gov.wales/publicservices/social-care/Local-authority-responsibilities/Safeguarding/safeguarding-boards/?lang=en#/publicservices/social-care/Local-authority-responsibilities/Safeguarding/safeguarding-boards/?tab=overview&lang=en>

³³ <https://www.gov.uk/find-out-dbs-check>

housing for rent, but continues to rely on houses donated by four housing associations at a peppercorn rent.

In contrast, Boaz Trust previously employed a solicitor, but decided to switch to a partnership with the Greater Manchester Immigration Advice Unit which is a local centre of excellence.

DASS operates in Glasgow and, like Hope, has focused on case resolution with accommodation being one of the essential ingredients to achieving this. It coordinates a triage system operated by the Scottish Refugee Council with Level 1 and some Level 2 expertise, referrals to Strathclyde Law Clinic which, in addition to providing more in depth legal support, offers two law student volunteers per case to provide advocacy support. A rota of solicitors takes on the more difficult and longer-term cases. Accommodation sits alongside this immigration model with 22 nightshelter spaces available to men and 10 spaces in shared houses. DASS wishes to grow its shared housing bedspaces to 20, to provide accommodation for women and people whose cases are likely to take longer to resolve.

In summary: Accommodation is an essential ingredient in mitigating destitution; its provision is a challenge when those in need cannot pay rent due to their NRPF status. Various models have developed throughout the UK:

- Those where no rent/fee is charged such as hosting supported by staff, as well as trained volunteers, and shared accommodation dedicated to refused asylum seekers;
- Those where rent is collected from those able to pay – mainly shared accommodation which houses a mix of refused asylum seekers and those able to pay rent, often refugees with status, but increasingly other groups such as destitute migrant children and families supported by local authorities under statutory obligations. Some providers of mixed schemes have secured status as ‘specified’ accommodation which means they are exempt from Local Housing Allowance limits on housing benefit claims. A few organisations are helped by Supporting People funds from local authorities.

Details differ; in some schemes, houses are shared by those with NRPF and those who can pay and in others this is not the case. Houses are procured in various ways: donated by philanthropic individuals (while they don’t need them) or housing associations or leased from housing associations at an affordable rent or from private landlords using a social-lettings model, or purchased with social investment or charitable funds. Leasing and purchase provide greater security and purchase develops an asset base for the organisation.

The types of provider organisation vary, although the majority are small to medium-sized charities that have developed over the past decade to grow responses to migrant destitution. An appeal to the social mission of housing associations, particularly in England to BME associations via their ‘Migrant Pledge’^{28,29} and to ‘Homes for Cathy’ members³⁴ has brought them in as supporters and providers of bricks and mortar along with the expertise required to manage it. A few have engaged more directly in provision and some homelessness organisations, especially in London where need is so great, have started to use bedspaces for people with NRPF, including refused asylum seekers.

³⁴ See Commitment no. 8 <https://homesforcathy.org.uk/commitments/>

All schemes recognise the importance of stability, safety and security to improve the well-being of people seeking sanctuary and, increasingly, have acted on the need to improve and/or clarify their safeguarding policies and practice.

Supporting a pathway out of destitution is the main goal for schemes, which requires engagement with good quality immigration advice, advocacy and representation. Some organisations start with this as their focus; Hope Projects in Birmingham and DASS in Scotland for example. The success of all schemes will inevitably be judged by how far they can access good immigration services and support residents to engage effectively with it.

5. PROVISION IN WALES

This Section outlines existing accommodation provided by constituted groups in Wales and, to some extent, notes how it interrelates with other services needed to support sustainable solutions to destitution (see Section 3). The Section does not cover accommodation provided by friends and informal networks, but, in Section 6, we report on feedback from the consultation about such informal approaches. It also does not cover the development work being undertaken by Tai Pawb funded by the Welsh Government to develop housing and integration services for refugees and which has identified some appetite within the housing sector to consider refugee housing models which might make bedspaces available to refused asylum seekers. Tai Pawb has held a roundtable to consider replicability in Wales of the Action Foundation model (see Appendix 5).

The brief did not require an evaluation of current provision, but in Section 6, we report key issues raised during the consultation carried out as part of this project, including from people seeking sanctuary, some of whom have used schemes in Wales.

5.1. Key services for refused asylum seekers

The brief for this study was to research development of accommodation models. We did not therefore research other services in any depth. However, as is made clear throughout this report, any provider of accommodation for refused asylum seekers must engage with the networks of wider provision to achieve positive results for those they accommodate.

The key players working across Wales are:

- The British Red Cross which runs drop in services and provides emergency cash allowances in each of the four dispersal locations;
- The Welsh Refugee Council which coordinates the Welsh Government funded Asylum Rights Programme consisting of seven partners: City of Sanctuary (CoS), BAWSO, EYST, Displaced People in Action (DPIA), TGP Cymru (children and young people) and Asylum Justice - each providing specific services to support asylum seekers to access their rights, some of these are group specific and there is dedicated advice provision trained to OISC Level I in each of the four dispersal locations.

In specific localities, faith and community-based drop in and activity services exist many of which appear to be well-networked with other national and local players. These include the following:

Cardiff

- The Destitution Clinic which is run by a partnership involving key players tackling destitution in the city: the British Red Cross, the Welsh Refugee Council, Home4U and ShareDYDD. A coordinated caseload and housing waiting list has recently been established to ensure the beds available in Home4U and ShareDYDD are prioritised effectively;
- Oasis provide drop-in and advice provision for both asylum seekers and refugees who have recently got status;
- Trinity Centre provides a welcome, drop-ins and practical support in partnership with others including Space4U, Welsh Refugee Council, the Sudanese Community Centre of South Wales and Student Action for Refugees.

Newport

- The Gap in Newport is an important 'go to' place for asylum seekers and refugees who have recently got status. It offers food cooked by volunteers and guests and a range of activities including badminton, haircuts (provided predominantly by Kurdish guests and former guests). It has recently received a grant from Lloyds TSB Foundation to undertake business development work exploring the feasibility for a social lettings agency.
- At the time of the research, there was one host in Newport to whom the Gap made referrals. Given the scale and informality of this activity, this is not listed as a hosting project below

Swansea

- Unity in Diversity runs a twice weekly community drop-in;
- Swansea Asylum Seekers Support (SASS), runs a twice weekly drop-in and is the responsible body for Share Tawe;
- Swansea City of Sanctuary makes links to Wales-wide issues and convenes the Destitution Working Group which seeks to improve services to end destitution including through development of a shared housing scheme;
- The African Community Centre Safety Net project reaches out to asylum seekers and refugees to support social connections and signpost to advice and services.

Wrexham

- Just Across - runs a weekly drop-in.

5.2. Accommodation provision accessible to refused asylum seekers in Wales

Table 1 below outlines the role, provision and, where the information was available, support model and capacity of:

- Two hosting organisations, ShareDYDD in Cardiff and Share Tawe in Swansea;
- The only shared housing scheme in Wales, Home4U in Cardiff;
- Nightshelters/hostels;
- Bedspaces supported by other bodies.

Hosting: ShareDYDD

ShareDYDD (SD) is a hosting project in Cardiff which has existed informally since 2011 and is in the process of registering as a Charitable Incorporated Organisation (CIO). Eight -10 guests are hosted at any one time and there is a wider network of 25 potential hosts.

Staff and volunteers: A NACCOM grant has supported a 15 hour a week 'development coordinator' post shared with Home4U (one day a week for each project). Since the end of 2019, new funding has been secured from charitable foundations to continue to support this post. The postholder has coordinated case management and referrals from the Destitution Clinic and supported and developed link workers assigned to each guest whose role includes supporting engagement with their immigration case. Previously the charity was run by volunteers.

Recruitment of hosts: There was a spike in hosts and capacity following the media coverage of the Syrian refugee crisis in 2015/16. Interest has since dwindled and recruitment is one of many needs which the part-time coordinator and volunteers try to address.

A partnership has developed with Refugees at Home, a UK/GB-wide charity established in 2016 which involves host recruitment by Refugees at Home and local support and matching by ShareDYDD.

Referrals are via the Destitution Clinic and the part-time worker has developed a coordinated system which involves a waiting list and regular meetings of Clinic staff to assess needs and priorities for vacancies as they arise.

Safeguarding: Over the past year, SD has utilised expertise from a former lead safeguarding officer to support development of a robust policy and procedure. Refugees at Home have local volunteers with relevant professional training who conduct risk assessments with all potential hosts in their home.

Immigration casework support and other needs: Link workers are assigned to each person hosted to ensure basic needs are met through access to emergency funds, travel costs, food etc. The link workers are playing an increasing role in supporting proactive engagement with immigration advice.

Focus and development plans: The current focus is on establishing a more secure referral process with key partners who can provide casework capacity alongside their hosting provision. ShareDYDD has been successful in securing three grants to continue existing capacity for three years.

Hosting: Share Tawe

Share Tawe is a hosting project in Swansea which seeks to offer hospitality - accommodation, meals, welcome and solidarity - to destitute asylum seekers through volunteers who offer a room in their home, or who support the scheme in other ways. It operates within a wider Swansea destitution network which worked with funding from Quaker Housing Trust to found a hosting scheme in 2009. A partnership existed with Shelter Cymru for several years until 2014 during which the number of hosts was small, but the number of bedspaces utilised during the year was high due to intensive casework and positive results (this was also a period of proactive Home Office case resolution).

Staff and volunteers: Until the end of May 2019, a two-year Lloyds TSB grant and additional support from a NACCOM grant enabled Swansea Asylum Seekers' Support (SASS) to employ a project coordinator for Share Tawe for two days per week. Since then the SASS Volunteer Development Worker has been given an additional two days a week to fulfil the Share Tawe role supported by a recently awarded Comic Relief grant plus some local fundraising and use of reserves.

Recruitment of hosts happens predominantly through local networks and publicity.

Referrals are from the network of providers who are in touch with and supporting refused asylum seekers in Swansea.

Immigration casework support and other needs: During 2018/19, a high level of engagement with immigration advice was a priority for the project coordinator. People are also supported to access help to meet basic needs from emergency funds, travel voucher schemes etc.

Focus and development plans: Share Tawe are actively fundraising for continuation of paid staff time and are concerned that time spent on hand-to-mouth fundraising detracts from development work.

Share Tawe and its supporting networks have always had a goal of developing other accommodation. A few years ago, Share Tawe partnered with a housing association to develop a mixed use scheme with refugees housed and in receipt of floating support via the housing association partner and Share Tawe allocating and supporting destitute asylum seekers. It is acutely aware of the needs of those who would not be housed by hosts. Unfortunately, changes within the housing association partner meant that particular scheme did not develop.

'... it would be good to have this other option [a shared house] as hosting can only go so far ... there are no financial benefits from hosting. How long can you keep people interested in hosting strangers? Some people feel it's a human obligation. But there are limits to people's generosity Some categories of destitute asylum seeker cannot be hosted in people's houses, for example, if they have mental health problems or have been physically violent and are still destitute, and can't be taken by social services.'

Shared accommodation: Home4U

Home4U is a shared accommodation project, a registered charity currently providing four bedspaces. It works closely with a separate charity – Space4U - which is a drop-in centre with a variety of services for people who are asylum seekers and refugees, and which also prioritises support for those who are destitute.

Staff and volunteers: The lead volunteer and founder has 15-plus years experience in running projects for asylum seekers and advising this group (she previously worked for Asylum Justice). One day a week paid staff time has been funded by NACCOM.

Referrals are via the Destitution Clinic. Home4U house male refused asylum seekers.

Focus and development plans: Home4U had to hand back a four-bed house to the Catholic Diocese who needed it for clergy housing but Wales and West Housing have donated two two-bed properties for a rent-free period. Over its 10-year history Home4U has had loan of five properties and the need to hand a property back at short notice and plan move on for residents has forced a rethink about developing more sustainable relationships to secure and manage housing. Home4U hopes that the newly formed partnership with Wales and West will prove successful and encourage other HAs to get involved in Cardiff and other areas of need.

Shared accommodation: Share Tawe and SASS

There was a plan a few years ago to develop a mixed shared housing scheme in Swansea which would have been a partnership between a housing association operating locally and Share Tawe/SASS. The scheme was at quite an advanced stage of planning, but changes in the partner housing association stalled set up. It would have included refugees paying rent supported by the housing association, with floating support funding available from the local authority and some spaces allocated and supported by Share Tawe/SASS for refused asylum seekers.

Temporary accommodation: BAWSO

BAWSO is an all Wales Organisation providing generic and specialist services including training, the provision of temporary accommodation for those affected or are at risk of Domestic abuse and all forms of violence such as Female Genital Mutilation, Forced Marriage, Honour Based Violence, Human trafficking and modern slavery. It fundraises to ensure that it can provide temporary accommodation to some people who are NRPF.

Nightshelters and hostels: various providers

These are used as a last resort by homeless asylum seekers and refugees (see Section 4.8 above) and most shelters are only open in the colder months. It was reported that the Huggard Centre in Cardiff might typically have two asylum seekers staying on the floor each month and refugee and asylum support projects are aware that people have used shelters when they are open and there is no alternative. However, the main feedback from key players, including people seeking sanctuary, has been that the environment in many nightshelters and hostels is so culturally alien and inappropriate that usage is probably lower than among many other homeless people.

In Cardiff, the introduction of pods to at least one hostel was welcomed because they appear to be targeted at women and groups, including people seeking sanctuary, who would be especially vulnerable in the shared spaces.

Another barrier to use of nightshelters and hostels is lack of clarity about access for people with NRPF. In Cardiff, people working with refused asylum seekers talked of making referrals into nightshelters and this appears to also be the case in Swansea. The picture was less clear in Newport and Wrexham. Referrals for many nightshelters, including those run directly by Housing Justice Cymru in Wrexham, Neath Port Talbot and Swansea, are via local authorities. Local authorities interviewed as part of this project said that shelters should be open to all including those with NRPF. This accentuates an overriding problem of low levels of awareness within homelessness services generally, including nightshelters and hostels, about the needs of refused asylum seekers and the best place to refer them for help and advice.

Bedspaces paid for by voluntary groups as an emergency response: British Red Cross

The British Red Cross reported paying for bedspaces very occasionally where there are no other options, in Wrexham, for example.

Accommodation supported by public bodies

Such accommodation is provided to meet statutory obligations, for example, under the Social Services and Well-being (Wales) Act 2014 to support children, young care leavers and vulnerable adults in need (see Appendix 3). There is a scheme supported by Newport City Council which accommodates young people who arrived as unaccompanied asylum-seeking children and is run by a Wales-wide housing association.

Asylum and refugee support groups reported trying, sometimes successfully, to refer people they deemed at risk and too vulnerable to be accommodated in a hosting scheme or Home4U. However, difficulties accessing assessments for vulnerable refused asylum seekers is reported by support groups, including hosting schemes. Clearly, it would be difficult for voluntary run projects and hosting schemes to accommodate people with high needs and yet they also find it hard to turn people away. For example, ShareDYDD have accommodated someone who had recently had a brain tumour removed and two people they accommodated during the year were referred into social services care.

Newport and Wrexham

There is currently little or no provision in either Newport or Wrexham. In Newport, the Gap has just secured support from a second host and a grant to assess the feasibility of a social-lettings agency. In Wrexham there is no provision although we heard about: informal hosting taking place through a church; the British Red Cross funding B&B for someone they were very worried about; and a solicitor who had accommodated a client who otherwise would have had little chance of success in their immigration case. No doubt, there are more stories of informal arrangements and human kindness, in particular within refugee communities.

5.3. Access to immigration advice for accommodation projects

The advocacy support to those hosted or accommodated by Home4U and provided by the limited hours of paid workers and volunteers is of critical importance.

'What I see with a destitute asylum seeker is only the sustainable route out of destitution and so you have to know the route you can go through to help. The aim is to get status. From experience, I find the brain needs to be a bit settled to focus on your case. When a guest comes in, I tell them that they have a temporary placement but it's not for ever and they now have a chance to accelerate their case to a point where they can get back into the system. I try to make sure they know this. We talk about being organised with their case. Every solicitor you go to they say you need proper documentation and all in order. Solicitors don't engage with word of mouth they engage with paper. The only way out for many means going back into the system via Section 4'

Hosting Support Worker

As the 'Models of Immigration' report referenced above¹⁶ identified, it is vital that all levels and types of immigration advice input are supported and work together effectively. Legal aid for asylum cases is a limited sum and does not pay for the resources needed to ensure people can engage effectively with their case, for example, in collecting and collating evidence and ensuring their legal adviser is providing a service to the required standard. Expertise however is in short supply. Too often provision is of poor quality even though immigration advisers and legal representatives can only operate if accredited with the Home Office-administered 'Office of the Immigration Services Commissioner' (OISC) scheme. People can end up using poor quality solicitors recommended through word of mouth networks, including through communities and faith groups, who may be well meaning, but ignorant of what constitutes good advice.

Advocates pointed out that there are no public law practitioners in Wales if people with NRPF want to challenge a decision rooted in public law, for example, around access to public services on the basis of vulnerability.

The Asylum Rights Programme (ARP) funded by the Welsh Government since 2017 and coordinated by the Welsh Refugee Council has provided Level 1 OISC advice in all dispersal areas. The Welsh Refugee Council has made sure that its Section 4 processing has become more efficient and gets quicker results. This in turn can reduce the length of time for which people require a free bedspace.

Asylum Justice (AJ) has also been funded by the Welsh Government. AJ plays a vital role in Wales in representing those without existing legal support and/or where a legal representative is unable or reluctant to attend court hearings. Appeals are heard in London so many projects also use the national Asylum Seekers' Appeals Project (ASAP) to support their clients.

All three accommodation projects, (hosting in Cardiff and Swansea and Home4U), have increased the emphasis on supporting proactive engagement of refused asylum seekers with

their immigration case. This is necessary to achieve a route out of destitution for individual people, but also to help more people by moving people in and out of the accommodation provided more quickly.

5.4. Outcomes

Monitoring of immigration outcomes has improved alongside the more proactive work to support people to engage in their immigration case. Approximately 50 people were accommodated in 2017/18 by the three accommodation providers. Nearly half of those accommodated by the two hosting schemes over the past year have had positive moves following receipt of Section 4 support from the Home Office or, in two cases, leave to remain. Some people moved to friends and family and many remained in the provision in that year. Other benefits of being accommodated will include better mental and physical health, but these outcomes are not currently captured systematically.

In summary: There are three organisations in Wales dedicated to accommodating refused asylum seekers: two hosting schemes – ShareDYDD in Cardiff and Share Tawe in Swansea - accommodating between eight and 10 refused asylum seekers and Home4U accommodating refused asylum seekers (only men) in shared housing Cardiff. The organisations are small and capacity is limited, but over the last two years, experience and funding from trusts and a one-off NACCOM fund has facilitated significant developments in organisational infrastructure. These include improving safeguarding policies and focusing more effectively on supporting guests and residents to engage with their immigration case.

The one shared house scheme, Home4U, is an important provider, particularly for those who cannot be hosted, for example, it is more difficult to find a hosting places for men. However, Home4U has struggled to secure and sustain properties. It is hoped that the brokering that took place with housing associations as part of this project which resulted in a donation of two properties for a rent-free period from Wales and West Housing will prove to be successful and encourage other HAs to engage in similar arrangements.

Share Tawe/SASS have developed a model for shared accommodation in partnership with a housing association; this experience could be built upon to underpin a partnership with a different housing association.

There is little provision in Newport or Wrexham.

There were mixed reports about access to, and suitability of nightshelters. There is also frustration amongst advocacy groups and accommodation providers about poor awareness within statutory bodies in the case of people who are vulnerable, including families with children, and to whom they believe there may be a statutory responsibility.

With need estimated at several hundred becoming destitute in Wales every year, the existing provision is clearly insufficient. Most people will be accommodated by friendship and kinship networks, but ensuring they are able to access and utilise support is more difficult when people are housed in this way, and risks of exploitation and hardship within these communities is high.

A key difference between models explored elsewhere and those in Wales is that there does not appear to be a great deal of capacity amongst asylum and refugee support organisations and

existing accommodation providers to manage shared housing schemes of the type found in England. Share Tawe tried and The Gap in Newport have recently started work to scope the potential for a social lettings agency. There may also be potential through the other development project funded by the WG and being delivered by Tai Pawb, which is exploring housing models for refugees and is currently researching the Action Foundation approach in which refused asylum seekers are housed alongside refugees.

Table 1 - Accommodation provision for refused asylum seekers in Wales (accurate in July 2019 with some updating in November 2019)

Organisation and location	Model of accommodation and support	Numbers helped/outcomes	Funding/available housing
<p>ShareDYDD (SD), Cardiff Hosting scheme</p>	<p>Offers accommodation in people’s homes</p> <p>Hosts are supported by Refugees at Home (not all hosting at any one time as people often take a break) although SD very involved in the process.</p> <p>One day a week coordination – post shared with Home4U and supported by volunteers some of whom act as link workers to support guests including to engage with their immigration case.</p> <p>Referrals from groups involved with Cardiff Destitution Clinic and made via a waiting list discussed regularly by BRC, WRC and SD and Home4U coordinator.</p>	<p>Hosted 23 people in 2018/19 (13 men; nine women and one ‘minor’) at different stages in the asylum process including 4 ‘Appeal Rights Exhausted’ (ARE) but vulnerable.</p> <p>Outcomes: Four obtained Section 4 support; four housed by Social Services; one supported under Section 98; one successful Judicial Review; four moved to be nearer solicitors/ friends; nine still current clients</p>	<p>Volunteer time (travel etc. costs covered)</p> <p>Small grant for p/t 15 hr p.wk post to Sept/Oct 2019 working across SD and Home4U employed by Home4U and funded initially by NACCOM grant and now from grants from charitable trusts.</p>
<p>Home4U, Cardiff Shared housing</p>	<p>Two two-bed properties donated for rent-free period by Wales and West Housing offering bedspaces for four refused asylum seekers at any one time (mainly men) and stays for three months and subject to review up to six months.</p> <p>House managed by and utilities paid by the charity.</p> <p>One day a week coordination – post shared with SD and supported by volunteers</p> <p>Referrals as for SD</p>	<p>During 2018/19 at point of move-in, seven were preparing a Fresh Claim and six were Appeals Rights Exhausted but very vulnerable incl. one man who had just had major surgery to remove a brain tumour.</p> <p>Outcomes in 2018/19: Two awarded Section 4 support; two referred to SD (see above); two moved in with friends; two moved out voluntarily; one unknown; four still resident (July 19)</p>	<p>Donations including housing for rent free periods.</p> <p>See SD above re staffing</p>

<p>Share Tawe, Swansea Hosting scheme</p>	<p>Offers accommodation in people’s homes</p> <p>Hosts not all hosting at any one time as people often take a break</p> <p>Two days a week coordination and support worker post currently</p>	<p>Hosted 16 people in 2018, (six new placements); 3061 bed-nights (increase from previous year).</p> <p>Outcomes: One obtained leave to remain; nine offered Section 4 following submission of fresh evidence with eight of these placed in Home Office supported accommodation; others remain guests</p>	<p>Funding/donations</p> <p>Support costs and p/t post from Lloyds TSB Foundation and NACCOM to SASS (the employing organisation) ended in 2019 but Comic Relief grant and reserves and donations are paying to continue the post in 2020</p>
<p>Refugees at Home, GB wide hosting scheme</p>	<p>Hosting network - provides names of potential hosts to local operations and uses volunteers with a professional background in safeguarding and risk assessment to undertake checks of all hosts.</p>		<p>Donations and grants</p>
<p>Homeless hostels and nightshelters</p> <p>Cardiff, Newport, Swansea, Wrexham</p>	<p>Various, but with a focus on all those who are homeless, providing short term shelter. Some shelters are all-year round and some winter only. Most are led by faith groups coordinated and supported by Housing Justice Cymru and operating on the basis of welcome. Nonetheless shelters financially supported by local authorities and relying on LA referrals may be defined as provision under the homelessness legislation and therefore inaccessible for those with NRPF.</p>	<p>N/A</p> <p>N.B. In London one-third of shelter bedspaces are occupied by migrants who are non-EEA citizens with NRPF</p>	<p>Donations and other funding including funding agreements/contracts with local authorities (LAs) which could mean provision is treated a ‘public fund’ within immigration rules</p>

BAWSO, Wales wide	Provides housing to an unknown and variable number of people as part of its refuge and other provision for people experiencing, or at risk of, domestic abuse.		Fundraises to cover loss of rent for those with NRPF
The Gap, Newport	Has access to two hosts Recently awarded a grant to assess business feasibility of a social-lettings agency		Charitable donations Grants Lloyds TSB Foundation.

6. CONSULTATION

This Section of the report provides feedback from the consultation that was undertaken as part of the project. The consultation with statutory, third and voluntary sector organisations focused on seeking feedback about existing and potential models of accommodation and related services. The consultation with people seeking sanctuary was broader in scope.

Consultation was undertaken through the project Sounding Board (see Appendix 1), people recommended by Sounding Board members, individual interviews and sessions convened by the Welsh Local Government Association, Community Housing Cymru and the lead officer for migration/asylum in Wrexham. Appendix 2 lists individuals consulted and consultation events.

6.1. Consultation with people seeking sanctuary

Four consultation sessions were held with nearly 30 people seeking sanctuary; three of these were held as group sessions and convened by the British Red Cross (Wrexham), Displaced People in Action (Cardiff) and with current and recent residents of ShareDYDD and Home4U (Cardiff). A monthly meeting of Share Tawe guests discussed the consultation issues and written feedback from two guests was provided. In Newport, individual discussions took place with five asylum seekers, including four with NRPF, one of whom was staying with the only regular host in Newport at that time. Over half of those participating were refused asylum seekers and the others were mainly people still seeking sanctuary; a small number had been granted status.

A mix of single men and women and people in Wales with their families and some whose families were elsewhere were interviewed and there was also diversity in terms of where people had fled from. We did not record a profile of those interviewed because we did not wish to set up any barriers to participation. Payments were made to some people in recognition of the experience and expertise they shared with us and/or a payment was made to a relevant charity where consultation arrangements had been made by them.

Issues raised by people seeking sanctuary

Need

The desperation of people whose asylum claims had been refused was pervasive and unsettling. In starting to talk more freely in individual meetings, three people suddenly clammed up, got up and said they just had to stop talking. In group sessions, this manifested itself in feelings of anger being expressed. Perhaps because it was a Welsh Government funded project, some people thought there would be a more concrete solution being proposed and were disappointed when I said I was consulting at this stage.

The pain and hopelessness of not being able to make plans including plans to see loved ones outside of the UK, of not being able to contribute, of being futureless was palpable. A few people, mainly in the groups, talked openly of the effect of destitution on mental health.

'I've started talking to myself And sometimes I don't know where I am. I know my mental health is suffering.'

Refused asylum seeker in Wrexham

Several people had been destitute on and off for years – in the case of two men, 20 and 11 years respectively. One of these people said he'd been in the UK without status for over half his life. Both these men had discussed return with the Home Office, but with no safe return policy for the country in question, this has not been possible.

Transience, moving from place to place – sometimes including being in and out of Home Office contracted accommodation in between hosting – and often in other parts of the UK – was uprooting and frustrating. Trying to hang onto the few belongings you might have was difficult. One man said:

'It's expensive to keep moving rooms and buying those things you need to cook like spices and so on ... You lose track of your stuff and with not knowing what's happening you are in a position where your mind doesn't work.'

Refused asylum seeker in Newport

During the consultation, several people said they thought the Government should be able to take over an empty building which would provide a place to stay and be safe for any destitute asylum seeker.

Making a contribution

The desire to contribute was overwhelming. People felt deeply uncomfortable about being seen to be takers and pointed out that they had no choice since, asylum seekers, whether refused or with an application pending, are not allowed to work. Some people told me that the Welsh Government should prioritise getting the UK to lift this ban on employment. A number of people were involved in the 'Lift the Ban' campaign.

'We wouldn't need your project if we could work.'

Refused asylum seeker in Wrexham

The 'Lift the Ban' campaign is targeted at those with active asylum applications, but it is unlikely UK Government would ever agree to lift employment restrictions on those who have been refused asylum although the case for doing so, if people cannot return to their country of origin, seems strong.

When asked how a desire to contribute might translate to a housing context, not surprisingly, people struggled to be specific. A suggestion about getting involved in doing up empty properties got an enthusiastic response from some people. One group of three young men reported that there are quite a lot of people who want to train and/or already had construction skills; one of the group had himself just started working for a builder after getting leave to remain.

Staying with friends and relatives

We asked about experiences of staying with friends and family. Most people had stayed with informal networks at some point during their period of destitution.

'Everyone has friends and family you can stay with but for how long?'

'You feel a burden'

'The best friend in your family becomes your enemy'

Refused asylum seekers in Wrexham and Cardiff

Hosting

Five of the people interviewed said they had been hosted and one had lived recently in the Home4U house in Cardiff. People spoke extremely positively about their experiences; the accommodation, the hosts and the availability of travel costs which meant they could get out and about and involved in things. One person, who now works for a refugee project, said he had been one of the first Refugee at Home guests in southern England and he thought it was best that these arrangements were short term and structured with a clear agreement.

Most people interviewed hadn't heard of hosting and five concerns and questions emerged about:

- Safety and how people offering their homes are checked out;
- Matching;
- How disputes are sorted out;
- How expectations are managed;
- Making a contribution to the host.

Most said that they would welcome a hosting place if they needed one, although the strong desire to make a contribution came up.

'How could we help out in the hosting home so we don't feel useless or a burden. Maybe we could look after children or do housework?'

Asylum seeker in Wrexham

Many said they specifically liked the idea of being in someone's home and also if it's a family with children.

'Having normal family around and being able to play with children is good as it's bad enough as an asylum seeker having nothing to do and not being able to make plans etc. but imagine that if you have been refused.'

Asylum seeker in Cardiff

Nightshelters

A handful of people had used nightshelters and most knew of people who had. All feared what could happen to people using homelessness shelters; two men talked of knowing people who had ended up addicted to heroin because they were so vulnerable when they went there. However, one man who had stayed in the nightshelter in Manchester run only for asylum seekers by Boaz Trust reported a stark contrast between that experience and others in general homelessness shelters.

Shared housing

The one person who had lived in the shared Home4U house was positive about this experience. His biggest concern, which he had also experienced in Home Office accommodation, was people taking responsibility for cleaning.

People talked about the need for sensitivity in matching if accommodation is shared and for supporting sharing arrangements properly. There were a number of stories about poor matching

in Home Office contracted accommodation, with people from warring factions having to live together, or drinkers and smokers placed with people who are abstinent.

Immigration advice and detention

We asked about access to immigration advice. People talked of not knowing where to go and then using an adviser who they subsequently found out was no good. In talking about current advisers, people's responses were low key – *'they seem okay' ... 'she is nice'* – and did not suggest huge confidence. In several cases, this seemed to be linked to poor past experiences and not wanting to have unrealisable expectations.

A few people had been in and out of Home Office contracted accommodation, (including Section 4) and moved in and out of Wales. Most appeared only to have accessed Section 4 support as a result of advocacy from a third party, rather than via engagement with Migrant Help, the charity contracted by the Home Office to support applications.

Several people had been detained and found this traumatic, as they also found the sudden notification that their accommodation and support would end within a few weeks, (officially 28 days or 21 days for those who are appeals rights exhausted), because they had a positive decision on their case or had been refused.

6.2. Need and gaps in accommodation provision: organisational perspective

There is a clear mismatch between need and provision, both in terms of numbers of bedspaces overall and a range of options. 30 to 50 people have been accommodated annually over the last 5 years, mainly as guests with hosting households, yet advocacy and provider groups reported that the little data available indicates there are several hundred people becoming destitute each year.

Not all who are refused and cannot access Section 4 provision will need accommodation; most will stay with family and friends, although too often these informal arrangements are exploitative and/or difficult for communities to sustain if they have limited household resources (as already highlighted in the feedback from people seeking sanctuary). It is also more difficult to ensure people are accessing services and good immigration advice.

The highest number housed was when hosts coming forward increased as a result of the Syrian refugee crisis. Some people felt citizens with feelings of goodwill towards people seeking sanctuary may have transferred their resources to support the Syrian Resettlement Scheme.

Hosts are more likely to want to host women, but there are more male asylum seekers and people with specific high needs may not be suitable for hosting. For example, the Home4U/ShareDYDD worker talked of a man who was deaf and another with epilepsy who were able to manage their conditions in the shared Home4U house, but it had not been appropriate to place them with hosts.

There is little shared housing for refused asylum seekers in Wales; only the scheme operated by Home4U. An attempt to establish a partnership scheme in Swansea involving an asylum support group and a HA did not come to fruition. Some people commented that it may also be difficult for some people to share. Most people have to share in NASS accommodation, not always happily.

Several people argued that there would be less need if statutory bodies or those commissioned/contracted to provide publicly funded services were fulfilling their role effectively (see below).

Hosting and potential for its development

The hosting schemes are keen to develop their capacity, but need further resources to do this. There have been discussions about, and appears to be general appetite for, a South Wales approach to further develop existing hosting schemes in Cardiff and Swansea, as well as to establish greater capacity in Newport.

We were informed towards the end of our research about an informal hosting scheme in Wrexham supported by a Christian fellowship and have linked up this group with Housing Justice Cymru who are interested in exploring how they can draw on expertise from Housing Justice's London hosting scheme to play a role in Wales.

Public sector bodies wanted reassurance that adequate safeguarding policies and procedures are in place. The two constituted hosting projects reported that involvement with NACCOM has supported development of more formal approaches to safeguarding and other vital areas of policy and process.

Potential for development of shared housing

Most people consulted agreed that more shared housing would help address some of the need, including offering an option to people not suited to hosting.

There was discussion about houses being offered for shorter term needs. However, this conflicts with the feedback from those involved with, and used to referring into, hosting schemes, i.e. that hosting works better if promoted as a short term option, (even if some guests stay longer once a relationship is formed), and that other options are needed for the cases, (all too many), which take longer than 3 – 6 months to resolve.

Four housing associations attended a meeting to discuss both the accommodation and support needs of refused asylum seekers and housing and integration models for refugees, the latter the focus of another Welsh Government commissioned project delivered by Tai Pawb. This meeting concluded that there is potential for housing associations being involved in developing models which meet the needs of both groups, (the mixed models described in Section 5), as well as those that meet the needs of only one of the groups. As outlined in Section 5, at the time of finalising this report, an arrangement between Home4U and Wales and West HA has been established which will enable two two-bed shared housing units to provide accommodation for four refused asylum seekers at any one time. Wales and West HA hope their commitment will encourage other HAs to enter into similar arrangements.

Appetite amongst housing associations to engage was identified amongst other housing and homelessness providers operating in Cardiff and Swansea who were not able to attend the meeting referred to above. Tai Pawb is taking forward further exploration of housing and integration models and is keen to look at ways it can develop a Welsh approach akin to 'The Migrant Pledge'^{28,29}. A Shelter Cymru adviser reported that they see very few people with NRPF and that this is probably because they would not know where to refer people beyond local nightshelters which she also admitted were not always suitable.

An advisory note targeted at local authority social services staff has recently been agreed and issued jointly by the Welsh Refugee Coalition and the Welsh Government to clarify that children in need and vulnerable adults are covered by the Social Services and Well Being Act regardless of whether they have NRPF³⁵. They may need to pass a threshold for support under a well-being assessment and, if NRPF, also to pass the threshold under a human rights assessment. During the consultation carried out for this research, external groups consulted and many individuals within local authorities identified a lack of clarity and poor practice in assessing the needs of people under this legislation. Existing providers of accommodation for refused asylum seekers expressed frustration that people with very high needs are not even getting access to assessments at times. High needs cannot be met within the under-resourced voluntary provision they run and which is fuelled by good will. However, some emphasised that this can also apply to other homeless people and that resources for social care are extremely tight, cautioning against measures which could be interpreted as preferential treatment and access of people with NRPF. The recently published note referred to above is designed to develop greater clarity and consistency in practice across Wales.³⁶

6.3. Expectations of the Nation of Sanctuary Plan

Most asylum and refugee support groups had been involved in the consultation about the Plan which took place in 2017/18. There was a sense of urgency about getting on with delivery rather than commissioning further research. Concern was expressed by a few people that resources that have been set aside to develop capacity to deliver more accommodation for refused asylum seekers might be lost to other needs if there was too much delay in moving to action.

Outside of the specialist sector, few people had heard of the Nation of Sanctuary Plan. However, we identified a positive attitude to considering ways in which housing associations and faith groups in particular could help in delivering on the Plan's objectives, including through donating or leasing stock at affordable rent levels. This positivity is despite other pressures; for example housing associations are under pressure in relation to other policies and strategies such as the Affordable Housing review and contributing more to tackling homelessness through Housing First approaches; and churches need to utilise their assets to support religious activities and the upkeep of churches.

6.4. Expectations of the feasibility study

Some members of the sounding board hoped that the study would identify specific costed models which could be developed by willing providers. This aspiration is explored in the final concluding section, with recommendations for next steps.

In summary: Overwhelming messages from the consultation with people seeking sanctuary were around extreme need, a sense of limbo, but a strong desire to make a contribution. There appeared to be a worrying lack of knowledge about, and confidence in, the outcome of immigration cases; perhaps a fear of dashed hopes. Knowledge about accommodation schemes for refused asylum seekers was limited, except for those who had been housed in schemes and who were positive about these. Feedback from the small number of people who had used nightshelters was largely negative, with the exception of the Boaz Trust shelter in Manchester which one person had used, and which is specifically for asylum seekers and refugees. Concerns

³⁵ See Footnote 2

³⁶ See Footnote 2

about safeguarding and matching in hosting schemes and sharing and management of disputes in housing schemes were expressed. Staying with friends and relatives was identified as the most common means of coping, but people also talked about the unsustainability of this option.

Asylum and refugee support groups were concerned about the gap between scale of need and provision and their capacity to do more. With the exception of Home4U, few groups seemed keen to drive and manage accommodation projects beyond hosting. It is possible this apparent reluctance has been influenced by a stalled attempt by a Swansea group to develop a joint scheme with a housing association a few years ago. There was appetite from existing hosting schemes to join forces to build capacity. Accommodation options in Newport and Wrexham are currently limited to informal arrangements.

Groups who have been working with the Welsh Government for two years to develop a response, were keen to see a sense of urgency about investment in growing capacity to mitigate destitution in line with the stated objective of the Nation of Sanctuary (NoS) Plan. They had concerns about access to, and suitability of, nightshelters and about vulnerability assessments.

Outside of the asylum and refugee support sector, there is a lack of awareness about the NoS plan, but we identified a willingness to explore what contribution housing associations and church networks can make, including under the auspices of umbrella bodies such as Community Housing Cymru, Tai Pawb and Housing Justice Cymru through its Faith in Affordable Housing Programme. It is hoped that the successful negotiations between Home4U and Wales and West HA which took place as a result of, and during this project, will encourage other housing associations to explore and enter into similar arrangements with asylum and refugee support organisations, although capacity of organisations may limit scale initially.

Local authority officers with responsibility for migration issues were aware of the Plan, of the scale of need and of local destitution networks, but those leading on affordable housing and homelessness services were not as knowledgeable about the Plan and its implementation. There was a lack of effective liaison and coordination about signposting and referrals between statutory and voluntary projects and an understanding that assessments of vulnerability of people who are NRPF are patchy. On the other hand, local authority staff also expressed concerns about misunderstanding and perception problems within the voluntary sector which meant people seeking sanctuary were often poorly advised. The one homelessness advice organisation we talked to, Shelter Cymru, acknowledged that they did not have good knowledge about how to advise a refused asylum seeker and the worker expressed a desire for better information about provision to be shared more widely. Local authority housing and homelessness officers were open to consideration of support for schemes which would meet the housing and integration needs of refugees for which there may be win-wins for local authorities.

7. MADE IN WALES: SUMMARY, CONCLUSIONS AND RECOMMENDATIONS

7.1. Overview of our approach and recommendations

This feasibility study is one of a number of strands of work commissioned by the Welsh Government to deliver on its Nation of Sanctuary Plan, in particular the objective to mitigate destitution of refused asylum seekers, albeit within the confines of UK Government immigration policy.

The legislative and policy context for this work is complex involving policy areas that are devolved and those that are not. The Nation of Sanctuary Plan is helpful in setting out areas in which the Welsh Government is going to be taking work forward.

The specific brief for the study was to explore how existing models of accommodation in Wales can be grown and new ones established. The seven models of accommodation that we reviewed in an initial report, (see Section 5), were used as a framework for consultation with relevant service providers and advocates (see Appendix 2) and 30 people seeking sanctuary.

Evaluating existing provision was not part of the brief, but we have explored needs and capacity to ensure that our recommendations are grounded and viable. We have also addressed other resources needed to prevent and/or support routes out of destitution and make recommendations about their interaction with accommodation models, in particular access to good quality immigration advice, advocacy and representation.

Precise figures about the scale of need are not available and even estimates vary widely. Figures provided by voluntary organisations suggest several hundred refused asylum seekers become destitute each year and a JRF study of Destitution in the UK published in 2018 estimated over 5,000 destitute asylum seekers in Wales. Destitution can occur at any stage of the asylum process. The severe detrimental effects of destitution are described in the report by some of those whom we consulted.

We have concluded that:

- It is not possible to identify a specific accommodation model which works elsewhere in a different location and context and replicate it precisely in Wales where the same organisations and capacity do not exist. Instead, we recommend investment in partnerships and capacity building which draws on the strengths and commitment of key players operating within the asylum and refugee support field and the housing, homelessness and public sectors, in particular local authorities;
- There is a case for a Wales wide approach to the development of effective cross-sector partnerships. However, it is vital that national development work draws on the experience of local destitution work and is delivered in partnership with, and builds the capacity of, these projects on the ground which have invaluable expertise, groups of volunteers and local networks, as well as effective ways of engaging asylum seekers;
- Those initiatives that can deliver the most bedspaces within a reasonably short time frame should be prioritised;
- Provision of accommodation must be linked to good quality immigration advice and representation and advocacy support to engage with it;
- Overall coordination and mutual accountability is crucial to ensure that resources are used well and to avoid duplication. This is particularly important given that, Wales Refugee Council have recently secured funding from the Oak Foundation for a housing project and Oasis, based in

Cardiff, are also seeking funding and partners for a project to address accommodation needs of their clients.

7.2. Key findings and overview of recommendations

The Nation of Sanctuary Plan provides a framework and rallying call for action in Wales. However, with the exception of asylum and refugee support agencies, few people we interviewed in the voluntary and housing sectors, faith organisations or public bodies knew much about it. Awareness within the public sector was higher than in the voluntary housing sector but we did not identify proactive engagement. We were heartened by the expressed commitment within housing associations and church networks to identify ways they can support the Plan's objectives, particularly in terms of housing and related expertise.

Models of accommodation developed in other parts of the UK and their potential application in Wales have been explored. Seven models are outlined and we found that in Wales, as in the rest of the UK, staying with family, friends and community networks is the main form of accommodation, but in many cases this is not sustainable and can place people at risk of exploitation.

The models of accommodation we propose for further development or establishment in Wales are:

- Hosting with resources invested across South Wales to enhance, coordinate and improve existing provision of ShareDYDD in Cardiff and Share Tawe in Swansea, as well as grow hosting in Newport (where there are currently only two hosts); to establish formal hosting arrangements in Wrexham; and with support to organisations to manage safeguarding risks effectively;
- Shared housing for refused asylum seekers building on Home4U's work in Cardiff, (now working with Wales and West HA), through increasing access to a supply of properties provided on a philanthropic /peppercorn rent basis as in the Hope Projects model in Birmingham;
- Shared housing using a business model which includes a proportion of rooms allocated to paying residents, (initially refugees), as well as some for refused asylum seekers. Relevant models in England include Action Foundation, Open Door, Boaz Trust, Arimathea Trust and Praxis in London. Other models could also be developed in the future which include other groups either able to pay rent, or for whom statutory bodies need to make provision and will contract organisations to do so, such as housing and support for 'Unaccompanied Asylum Seeking Children' and/or families with NRPF in which there are 'children in need'. Housing Support Grant is available in some instances and/or accommodation is specified and therefore exempt from Local Housing Allowance limits;
- Access to emergency accommodation, i.e. nightshelters which are accessible to people seeking sanctuary;
- Access to public sector provision under relevant powers such as the Social Services and Well Being Act.

A key difference between England, (where much of the innovation in accommodation models for refused asylum seekers has occurred), and Wales is capacity. The types of organisation (see Appendix 5) that have grown in dispersal areas in England and innovated in developing shared housing capacity of 10 to 30 properties, do not exist in Wales. Many of these organisations have been active for a similar length of time to destitution projects in Wales, but have expanded significantly through taking risks, becoming more confident and skilled in housing provision and networking proactively within the growing NACCOM network.

The detail of the models operated by NACCOM members vary; one for example has an agreement with a local housing association to provide a housing management function for its 20 properties including rent collection; another has increasingly professionalised its housing function with the appointment of a manager with a long track record of housing management. All have benefitted from leaders driving forward development and building capacity; not in most cases on a large scale, but with a focus on housing. During the consultation for this research, the capacity of the Welsh refugee and asylum support projects appeared limited in respect of developing such projects, including those focused on the needs of refused asylum seekers.

An holistic support package is required to alleviate the impact of destitution (see Section 3) and help people find routes out. Action and resources to support these other key elements of provision are vital if accommodation models are to be part of a pathway out of destitution rather than warehousing people who remain destitute. These include:

- Support for basic needs either through goods in kind, food, toiletries etc and/ or cash;
- Support for travel to engage with their case, but also meaningful activities such as English language and other opportunities which promote well-being and create healthier hosting and shared housing environments;
- Emotional support.

Together, both the larger Wales-wide and smaller, locally rooted groups, provide and raise funds for the different elements of the package. In each of the four dispersal centres, there are drop in places where people can get food and free goods and tap into help and support. These are often key referral places for accommodation options. In Cardiff, several key organisations run a weekly destitution clinic and have developed a more effective data sharing system and agreement and coordinated referrals of those most in need of accommodation. Underpinning housing and support schemes is increasing recognition that robust safeguarding policies and practice are required.

Access to good quality immigration advice, advocacy and representation is of the utmost importance. NACCOM members have increasingly focused on how they develop this provision either through partnerships or direct provision. For example Boaz Trust which used to employ a part-time lawyer, but now works in partnership with Greater Manchester Immigration Advice Unit, Hope which employs a part-time immigration solicitor and DASS in Scotland which started out with a project to better coordinate and speed up case resolution and sees housing as an essential component of success, especially for cases with merit but which may take a long time to resolve.

Findings focused on capacity in Wales

- **Hosting:** Share Tawe and ShareDYDD have existed for around a decade and have survived and developed with extremely limited resources and capacity. Recent funding for part/time staff and proactive engagement with NACCOM, has resulted in clearer policies and procedures around for example, safeguarding, and a more focused approach to the use of volunteers to support people, including to help people to engage with their immigration case through the ShareDYDD link worker volunteers (assigned to each guest) and the time of the Share Tawe worker. Both hosting projects spend a disproportionate amount of time trying to raise funds, but both have ideas for development. ShareDYDD shares a worker with the shared housing project, Home4U and has been exploring how it can increase capacity by working with the GB-wide hosting charity, Refugees at Home. Share Tawe has had plans to partner with a HA to develop a refugee scheme with some free bedspaces for destitute asylum seekers. Linking hosting and housing

projects can build on local referral and support networks, as well as access to immigration advice. We also came across several very informal projects;

- **Shared housing:** There is only one shared housing project run by Home4U, which has recently replaced a four-bed property which it had to hand back with four bedspaces in two properties donated by Wales and West HA on the basis of a rent-free period. It is difficult to sustain a model which is entirely dependent on informal gifted properties, but it is hoped that the partnership with Wales and West HA will encourage more HAs to make a similar commitment. A big difference could be made even if a handful of HAs were to donate several properties a year to support pathways out of destitution. Like the hosting projects, Home4U has functioned for much of its 10 years of existence with thinly stretched human resources, but has recently shared a worker, whom it employs, with hosting project ShareDydd;
- **Housing provision and management and the role of existing local refugee and asylum support projects:** Capacity amongst the hosting charities or asylum and refugee support charities to take on housing development and management functions seems limited. However, The Gap in Newport is exploring housing work and we believe appetite to engage needs to be tested more fully as part of the recommended development work. It makes sense to link the referral networks and support expertise that already exists, to housing providers that can donate properties or develop a mixed-economy/social enterprise model and provide a housing management function;
- **Supported housing management:** Some asylum and refugee support organisations seem prepared to act as a bridge between other housing models, such as shared housing for both paying and NRPF residents. In such cases, a partnership model could be developed whereby there is clarity about supported housing inputs for the paying residents and the support needed to help people out of destitution, potentially allocating to, and supporting, refused asylum seekers, including support to engage with immigration advice. The model which was being planned by Share Tawe and a housing association operating in Swansea envisaged supported housing and integration services provided by the housing association to paying refugees funded by Housing Benefit, floating support available from the local authority and Share Tawe looking after the refused asylum seekers. Use of Housing Support Grant funds and exemptions would need to be explored in conjunction with local authorities who appear open to discussion;
- **Nightshelters:** We did not review capacity in nightshelters but identified that generally they are not places where refused asylum seekers, (or refugees), feel safe or comfortable. However, there are clearly differences between different nightshelters and there was a feeling that the environment may be less alien where pods (individual spaces), are provided, and/or in the faith based shelters operating a 'dry' i.e. no alcohol, no drugs policy. This perception was not tested and generally it seems shelters are hard pressed. In some places in England, there are nightshelters specifically for refused asylum seekers, for example the Boaz shelter in Manchester;
- **Immigration advice, advocacy and support:** The Welsh Government has invested in Asylum Justice which provides legal representation and it funds the Welsh Refugee Council coordinated Asylum Rights Programme (ARP), a partnership of seven organisations coordinated by the Welsh Refugee Council to support OISC Level 1 advice in each of the four dispersal areas. The Welsh Refugee Council has undertaken development work to improve the efficiency of its Section 4 application processes which serves to reduce the time people are destitute and in need of free accommodation. The hosting projects have utilised their own volunteer and part-time staffing

resources to make sure they can provide some advocacy support for their residents and, without which, they find people struggle to engage including in collating, sorting and maintaining the type of documentary evidence needed to support their case. The importance of this type of advocacy support must not be underestimated;

- **Advice and assistance from local authorities:** Within local authorities, front line services dealing with advice and assessments, predominantly in homelessness and housing options and social services, are all under a lot of pressure from increased need and the impact of austerity in public sector spending. This affects all groups in need, not only refused asylum seekers, but there are also capacity issues around expertise and inadequate guidance which are specific to cases involving people with NRPF. The recent Welsh Refugee Coalition and Welsh Government note about Social Services and Well Being Act responsibilities provides helpful clarification to counter some common misperceptions for relevant staff and further training and guidance is planned on assessment and support for those with NRPF status³⁷;
- **Housing associations** are currently under pressure around their role and use of resources, for example the focus of the affordable housing review on increasing the numbers of affordable homes being built and pressure to address wider homelessness need through a Housing First approach and prevention measures. Nonetheless, they have housing stock in the four dispersal areas and housing management expertise. They are driven by a sense of social purpose and their stock is not treated as a 'public fund' unless allocated under the common housing register (unlike Council owned stock);
- **Faith groups:** Helping people in need, in particular the most vulnerable who fall outside of statutory provision, is also at the heart of the mission of many faith-based groups. Coordination is most developed amongst Christian churches via Housing Justice Cymru which coordinates many of the faith-run nightshelters participating in the Wales-wide winter shelter scheme and also the faith in affordable housing project funded by Nationwide Foundation;
- **Coordination:** The Welsh Refugee Coalition coordinated strategic thinking about the causes, impact and solutions to destitution in 2017. With a small executive group developing key actions, the Coalition has worked closely with the Welsh Government in developing the Nation of Sanctuary Plan, facilitating input from local groups operating services such as drop in centres in each of the four dispersal centres and consultation with people seeking sanctuary.

There has been coordination of access to rights via the Welsh Government funded Access to Rights Programme which is led by the Welsh Refugee Council. Individual charities in each of the dispersal areas coordinate their drop-in and other services, but capacity to do so is limited. Over the past year, the part-time ShareDYDD and Home4U worker has worked with other partners, (WRC, the British Red Cross and health partners), to coordinate inputs and information sharing within the Cardiff Destitution Clinic. This ensures that people are clear about the needs of each user of the clinic, including their needs for accommodation. Needs and are inputs are reviewed in weekly meetings, including who is in most need of any bedspaces available in Home4U or via ShareDYDD;

- **Appetite:** There is appetite amongst existing providers to do more and new players, including housing associations and church networks, prepared to explore what role they might play. In

³⁷ See Footnote 2

particular, our work has facilitated conversations about how interested parties with access to housing could plug the deficit in available bricks and mortar and expertise to manage it.

7.3. Policy and legislation

Policy and legislation differs in some key areas between the nations, but there is equivalent legislation in Wales to that in England, such as the Social Services and Well-Being (Wales) Act 2014 and Part 2 Housing (Wales) Act 2014 to support the recommendations and models proposed. In some instances, arguably the ground is more fertile in Wales than in England, for example in policy and funding for supported housing which remains ringfenced in Wales, as well as the existence of the Nation of Sanctuary Plan itself.

7.4. Roles and responsibilities of statutory bodies

We found frustration amongst the voluntary, charitable and/or faith-based sectors that public sector bodies were not fulfilling their duties effectively. The areas of statutory provision found wanting by advocates included: Home Office-contracted provision charged with advising and signposting; responsibilities to vulnerable adults and children in need under the Social Services and Well Being Act (but see above regarding relevant guidance published shortly before the publication of this report); and advice and signposting responsibilities for all homeless people. The Wales Strategic Migration Partnership facilitates exchanges on a number of key issues such as housing and co-chairs with the Red Cross the Wales Destitution Forum.

7.5. Consulting and supporting engagement of people with direct experience

Drawing on the expertise and perspective of people with direct experience of the issues is a central thrust in much new policy and legislation in Wales, including the Nation of Sanctuary Plan and the Social Services and Well Being Act. In our consultation with 30 people seeking sanctuary in Wales, we identified a strong desire to make a contribution rather than be passive recipients of charity. People who are destitute are struggling on a day-to-day level so to expect their participation in solutions may be naïve. Nonetheless, we propose that a 'Made in Wales' approach should consider how provision can empower and engage rather than make people feel they should be constantly grateful.

7.6. Recommendations

Nine recommendations are detailed below, including specific tasks required to deliver on the recommendation, resources needed, who will lead on its initiation and who else needs to be involved plus the timeframe for delivery.

About the recommendations and timeframe

In the recommendations below, we are proposing that the Welsh Government provide resources over a two-year period to strengthen and/or develop:

- Existing hosting provision in South Wales and new developments, for example, in Newport and development in Wrexham potentially led by Housing Justice building on its networks of support for homeless people;
- Shared housing for refused asylum seekers, as well as mixed housing schemes (refused asylum seekers with NRPF living with paying residents and/or residents who are supported under statutory obligations), with work to be coordinated by Tai Pawb drawing on its housing and equalities networks and Housing Justice Cymru drawing on its faith and affordable housing

networks, but working closely with, and paying for, the expertise of projects on the ground, in particular Home4U and Share Tawe.

There will be further development work to be done after the two-year period we set out in our recommendations. However, it is our view that focused work over a two-year period should enable expanded hosting and shared accommodation projects to be on a more stable footing, more able to attract funding from elsewhere, and in the case of shared housing, work towards a greater degree of self-financing.

The recommendations identify 2020/21 as the first year of the two year ‘programme’. This timescale may need to be adjusted dependent on access to funding/resources to implement the recommendations. By the end of two years:

- The creation of more bedspaces will have been prioritised within implementing the recommendations;
- Capacity to manage sustainable organisations and growth/development of provision will have been established within places where need and some provision already exists – Cardiff and Swansea - and new provision developed in Newport and Wrexham where there is currently little provision;
- Organisational capacity will be strengthened within existing providers of accommodation to refused asylum seekers and new partners will have come on board, including mainstream partners, who have developed networks and knowledge to add value to existing capacity and expertise, in particular through providing access to properties and their management;
- Development will build on this feasibility study and the consultation that has taken place as part of it and hit the ground running, including setting specific bedspace targets for delivery over two years;
- Accommodation developed will be safe for residents and providers/hosts, delivered in consultation with people seeking sanctuary and linked into a holistic package of support with a clear pathway out of destitution through access to good quality immigration advice.

Given the context of the Coronavirus pandemic and the intense pressure this places on public finances and other resources, should there be a need to prioritise between the nine recommendations, our view is that Recommendations 1 and 2 on awareness raising and developing hosting should be taken forward as a priority. However, in this context, we would not wish to see potential interest from housing associations to donate properties rent-free lost, but appreciate that a fully-fledged development project may not be feasible immediately. Implementing all the recommendations in full would require total funding from the Welsh Government of £250,000 over a two-year period.

Recommendation 1: Promote the Nation of Sanctuary (NoS) Plan more widely in the relevant housing, homelessness and related sectors, including to funders.	
Task(s) involved	<p>Identify key players to lead within each organisation set out below</p> <p>Prepare messaging and communications strategy</p> <p>Specify ways in which organisations, groups and people can work together to mitigate destitution</p>

Resources needed	<p>Communication materials</p> <p>Schedule of appropriate events, conferences etc</p> <p>Clear proposals about ways people can help including: properties; housing management and organisational infrastructure support; fundraising/donations to projects and destitution funds; hosting (see table later in this Section about proposed contributions/roles)</p>
Lead organisation/individual	Equality team, Welsh Government (WG)
Who else needs to be involved	<p>Community Housing Cymru (CHC) as membership body of housing associations</p> <p>CIH Cymru as professional body for housing and includes local authority housing staff and lead members</p> <p>Housing Justice Cymru which engages churches in nightshelter and affordable housing provision</p> <p>Tai Pawb – promotes equality issues in housing and is running a number of relevant programmes</p> <p>Shelter Cymru</p> <p>Welsh Local Government Association (WLGA) – homelessness network</p> <p>Welsh Refugee Coalition (WRC) which includes key asylum and refugee support organisations and has worked with the WG since 2017 to develop the NoS Plan</p> <p>City of Sanctuary which supports networks to promote ways of welcoming people seeking sanctuary and is active in Swansea and Cardiff and at national level</p> <p>DPIA and other user groups to share the user experience</p> <p>Wales Funder Networks/WCVA to identify how funders can support the Plan’s aim of mitigating destitution</p>
Timeframe	Conference season including CHC and CIH Cymru conferences in 2020/21. Target dates for delivery of units and additional hosts to be set over 2020/21
Intended outcomes	<p>More hosting placements and housing units delivered as part of a rolling commitment</p> <p>Support secured from housing and faith sectors</p> <p>Supporting the engagement and protecting the dignity of people seeking sanctuary who are directly affected.</p> <p>Supporting a participatory approach which proactively seeks feedback of people seeking sanctuary (including those who have been refused</p>

	<p>asylum) and considers ways in which they can engage with and contribute to the development of housing</p> <p>To draw on support and goodwill from individual staff and members of groups as potential hosts and donors.</p>
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Recommendation 2: Develop hosting including capacity building and enhancement of existing schemes in South Wales and establishing provision in Wrexham	
Task(s) involved	<p>2.1. Agree a brief with ShareDYDD and Share Tawe, (plus Refugees at Home and relevant groups in Newport, the Gap in particular), for joint work on a development project to enhance hosting provision across South Wales, including how project resources will support their engagement in development work</p> <p>2.2. Ensure resources are in place to maintain existing levels of hosting so that development work can build on this provision, develop more and establish a sustainability plan</p> <p>2.3. Recruit South Wales development worker</p> <p>2.4. Scope establishment of some capacity in Wrexham with the LA and destitution projects (the British Red Cross and BAWSO legal adviser) and discuss a potential role for Housing Justice Cymru to draw on its networks of support in Wrexham and experience of London hosting project</p> <p>2.5. Ensure effective safeguarding policies and procedures are put in place (see Recommendation 6)</p> <p>2.6. Ensure development maintains a focus on supporting pathways out of destitution with accommodation as one strand of this and clear commitment to provide or facilitate access to other support needed for a route out of destitution, in particular good immigration advice (see Recommendation 7)</p> <p>2.7. Agree targets for specific places across the 2 years of the project</p>
Resources needed	<p>Grant of £125K over 2 years for:</p> <ul style="list-style-type: none"> • South Wales development work with a worker employed either f/t or p/t at c.£30K pro rata (£60K over two years), on costs and project costs of £40K to include small grants to maintain the capacity of existing provision in South Wales • £20K to support development work in Wrexham potentially by Housing Justice Cymru • £5K for convening work, e.g. by NACCOM, potentially a Welsh hosting summit

Lead organisation/individual	<p>Equality team, Welsh Government, to secure resources</p> <p>ShareDYDD and Share Tawe working with destitution projects in Wrexham, Housing Justice Cymru (in Wrexham) and The Gap and other destitution projects in Newport to lead development work</p> <p>NACCOM expertise to draw groups together</p>
Who else needs to be involved	<p>Refugees at Home</p> <p>Welsh Refugee Coalition</p> <p>ARP (led by WRC) and destitution projects in Wrexham and Newport</p> <p>Share DYDD and Share Tawe networks and partnership in Cardiff and Swansea respectively</p>
Timeframe	<p>Grant of £125K agreed during 2020</p> <p>Strategy for development to be agreed during 2020 including: to promote hosting and recruit hosts on an ongoing basis; to set targets/timeframe for recruiting and increasing numbers of hosts in each of the four dispersal areas; improving infrastructure; including links to immigration advice, ongoing safeguarding; and a fundraising plan</p> <p>Two year development period</p>
Intended outcomes	<p>An increase in hosts and guests hosted with targets agreed (potentially 10 additional bedspaces in Cardiff, six in Swansea, two in Newport and four established in Wrexham over the two year period)</p> <p>Stronger partnership working, infrastructure and sustainability for hosting scheme(s) in South Wales, including more hosts in Newport</p> <p>Establishment of hosting in Wrexham</p> <p>Safety and security for people accommodated through robust safeguarding practice (see Recommendation 6)</p> <p>Better pathways out of destitution delivered for refused asylum seekers through improved access to immigration advocacy, advice and representation (see Recommendation 7)</p>

Recommendation 3: Support existing and further develop shared housing provision for refused asylum seekers

Task(s) involved	<p>3.1. Broker partnerships between those with their own housing stock which may be available for charitable use, in particular, housing associations and faith groups, and groups supporting destitute migrants to find a route out of destitution</p>
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	<p>3.2. Ensure effective safeguarding policies and procedures are in place (see Recommendation 6)</p> <p>3.3. Ensure development maintains a focus on supporting pathways out of destitution with housing as one strand of this and clear commitment to provide or facilitate access to other support needed for a route out of destitution (see section 3.4.), in particular good immigration advice (see Recommendation 7)</p> <p>3.4. Share information and experience about different models via NACCOM network</p>
Resources needed	<p>£100K grant for development work (see Recommendation 4 which this grant would support also)</p> <p>Effective coordination with asylum and refugee support groups/ infrastructure and immigration advice</p>
Lead organisation/individual	<p>Welsh Government Equality and Housing teams</p> <p>NACCOM</p>
Who else needs to be involved	<p>Tai Pawb</p> <p>Housing Justice Cymru</p> <p>Home4U</p> <p>Share Tawe</p> <p>CHC and members with specific interest (see Recommendation 1)</p> <p>WRC</p> <p>NACCOM</p>
Timeframe	<p>£100K grant over 2 years for development work/worker within Tai Pawb and Housing Justice Cymru drawing on, and paying for, the experience from the partnership established during this study between Home4U and Wales and West HA and of development work undertaken by Share Tawe in Swansea.</p> <p>In addition, we would recommend payment to Home4U and Share Tawe be in the order at least £25K over the two years.</p> <p>Report on development strategy during 2020 with targets for delivering specific number of bedspaces (see Recommendation 4)</p> <p>Two-year development plan</p>
Intended outcome	<p>Increase shared housing units for refused asylum seekers and sustainability of delivery with targets agreed potentially of 5 bedspaces over 2 years</p>

	<p>Safety and security for people accommodated through robust safeguarding practice – see Recommendation 6</p> <p>Better pathways out of destitution delivered for refused asylum seekers through improved access to immigration advocacy, advice and representation – See Recommendation 7</p>
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Recommendation 4: Establish shared housing to serve the needs of both refused asylum seekers and refugees in housing need but who are able to pay rent

Task(s) involved	<p>4.1. Broker partnerships as in Recommendation 3.1.</p> <p>4.2. Ensure effective safeguarding policies and procedures are in place (see Recommendation 6)</p> <p>4.3. Ensure development maintains a focus on supporting pathways out of destitution with housing as one strand of this and clear commitment to provide or facilitate access to other support needed for a route out of destitution, in particular good immigration advice (see Recommendation 7)</p> <p>4.4. Link with other relevant projects including: WG funded feasibility study of housing and integration provision for refugees which is being delivered by Tai Pawb and has identified interest from providers in making some bedspaces available for those who are NRPF; The Gap’s exploration of a social lettings approach; Housing Justice’s Faith in Affordable work; Housing First developments</p> <p>4.5. Share experience and information about models via NACCOM network</p>
Resources needed	As in Recommendation 3 above. Resources to be invested in one development project to deliver on Recommendations 3 & 4
Lead organisation/individual	Welsh Government Equality and Housing teams to commission Partnership of Tai Pawb and Housing Justice Cymru to deliver
Who else needs to be involved	<p>Home4U</p> <p>The Gap</p> <p>CHC and members with specific interest</p> <p>WRC</p> <p>Welsh Refugee Council (Oak Foundation funded housing project)</p> <p>NACCOM</p> <p>Share Tawe/Swansea City of Sanctuary</p>
Timeframe	As in Recommendation 3 above

Intended outcomes	<p>Increase shared housing units for refused asylum seekers living alongside refugees in housing need and the sustainability of delivery with targets agreed potentially of 15 units in total over the two year period including three³ for refused asylum seekers</p> <p>Safety and security for people accommodated through robust safeguarding practice – see Recommendation 6</p> <p>Better pathways out of destitution delivered for refused asylum seekers through improved access to immigration advocacy, advice and representation – See Recommendation 7</p>
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Recommendation 5: Develop accessibility to emergency accommodation options and referral routes to support pathways out of destitution	
Task(s) involved	<p>5.1. Clarify the accessibility and suitability of nightshelters in the four dispersal areas including exploration of whether specific provision is needed for refused asylum seekers (drawing on NACCOM experience)</p> <p>5.2. Monitor effectiveness of Home Office contractors’ delivery in relation to move on, (positive and negative), and ensure appropriate communications and partnership working using existing multi-agency arrangements</p> <p>5.3. Ensure homelessness and asylum and refugee support organisations providing advice to homeless and destitute people are aware of the availability and access arrangements of emergency, (and other), accommodation provision for refused asylum seekers informed by this research</p> <p>5.4. Ensure those involved in advice and emergency accommodation provision have a focus on supporting pathways out of destitution with an awareness that referral to emergency housing as meeting only one strand of need of the support needed for a route out of destitution, in particular good immigration advice (see Recommendation 7)</p> <p>5.5. Working with the NRP Forum, clarify and ensure greater level of awareness within relevant public sector and voluntary bodies about duties to assess need and potentially to make provision under the Social Services and Well-Being Act</p>
Resources needed	<p>Research of nightshelter provision for those with NRP including refused asylum seekers. This is envisaged to be a small piece of work which could be undertaken by an organisation already funded by Welsh Government or with an interest in this area such as the End Rough Sleeping Cymru (ERSC) Coalition</p>
Lead organisation/individual	<p>WLGA and Housing Justice Cymru re. 5.1. and 5.4</p> <p>Wales Strategic Migration Partnership (WSMP) 5.2 and 5.5</p>

	<p>Clearsprings and WG Equality Team re 5.2</p> <p>Welsh Government Equality Team and WLGA re 5.3</p> <p>WLGA and NRPF Forum re 5.5</p>
Who else needs to be involved	<p>Cardiff, Newport, Swansea and Wrexham LAs with involvement of homelessness/housing options and migration/asylum seeker lead officers</p> <p>The National Homelessness Network</p> <p>End Rough Sleeping Cymru (ERSC) Coalition</p>
Timeframe	Better service for asylum seekers by winter 2020/21
Intended outcomes	<p>Improve equality of access to emergency provision</p> <p>Improve assessments of those in need as defined by the Social Services and Well Being Act</p>

Recommendation 6: Ensure robust safeguarding arrangements are in place within hosting and housing developments and that housing providers and hosting schemes have appropriate links to those responsible for the conduct of health, social services and well-being assessments for vulnerable adults and destitute children

Task(s) involved	<p>6.1. Ensure policies and procedures are in place that include:</p> <ul style="list-style-type: none"> • clarity about the risks inherent in different kinds of schemes; • clarity about responsibilities, accountabilities including monitoring and review and board level involvement in overseeing management of risks and safeguarding responsibilities; • adequate training, supervision and support arrangements for staff and hosts; • clarity about mechanisms for reporting safeguarding concerns for staff, volunteers, hosts and links to local safeguarding boards; • a rationale for DBS checks and at what level. <p>6.2. Ensure actions already agreed are implemented to protect children, young people leaving care and vulnerable adults with NRPF in terms of training and development of policies and procedures to improve assessments under the Social Services and Well Being Act</p>
Resources needed	A condition of funding for hosting and housing development work to be robust development work on safeguarding arrangements as outlined in section 4.12 of this report

Lead organisation/individual	Welsh Government Equality team re 6.1. working with NACCOM and National Independent Safeguarding Board WLGA and NRPF Network re. 6.2
Who else needs to be involved	Existing accommodation and destitution support providers and their residents/guests NRPF Network WLGA Public Health Wales NACCOM Draw on expertise of NRPF Network regarding public sector responsibilities
Timeframe	Review as part of funded development work and associated timeframes
Intended outcome	That accommodation provision for refused asylum seekers is safe and appropriate for hosts, guests, residents and staff and that the needs of the most vulnerable are met appropriately

Recommendation 7: Ensure that accommodation provision has effective links to immigration advice and representation and is able to deliver either directly or in partnership, advocacy which supports guests/residents to engage actively with their immigration case

Task(s) involved	7.1. Ensure that a strategy for providing or accessing immigration advice, advocacy support and representation is built into any development proposed as part of Recommendations 2 – 5. This could be a city-wide approach (see 7.3. below) and involve advocacy training for both hosts and support workers and asylum seekers themselves 7.2. Establish monitoring framework which identifies asylum/ immigration outcomes and length of time accommodation and support is needed to achieve these 7.3. Explore the DASS model in Glasgow (outlined in Section 4) which has been funded by the Oak Foundation, but also had funding from the Scottish Government, within the context of the existing Asylum Rights Programme
Resources needed	Capacity to ensure that there are links between the accommodation development work and work supported by the WG to support access to immigration advice, including the scoping study that it plans to commission, to better understand the gaps in immigration legal advice and identify where it can support better access and provision
Lead organisation/individual	Welsh Government Equality team

Who else needs to be involved	Existing accommodation and destitution support providers and their residents/guests Asylum Justice and other partners involved in the Asylum Rights Partnership led by the Welsh Refugee Council Reputable legal firms offering good immigration advice/representation NACCOM to share other models for linking accommodation and immigration advice
Timeframe	Review as part of funded development work and associated timeframes
Intended outcomes	That provision developed as a result of this report and its recommendations supports pathways out of destitution

Recommendation 8: Influence the Home Office to review and change its policies and practices to alleviate destitution of refused asylum seekers	
Task(s) involved	8.1. Agree key issues to be highlighted, for example, how Home Office contractors perform against move-on KPIs (see 5.2.), Section 4 applications and decision-making times on applications 8.2. Agree and put in place coordinated data/evidence gathering and monitoring arrangements to highlight key issues 8.3. Identify agency/partnership which will have the role of collating, analysing and presenting data to the Home Office
Resources needed	A commitment from relevant refugee and asylum support agencies (coordinated by the Welsh Refugee Coalition), the WSMP and the WG Equality Team to coordinate, collect and collate evidence
Lead organisation/individual	Welsh Government Equality team
Who else needs to be involved	British Red Cross WSMP NRPF Network Welsh Refugee Coalition and its members WLGA Public Health Wales NACCOM
Timeframe	Review as part of funded development work and associated timeframes

Intended outcome	That the UK Government is held to account for those areas of reserved policy making which cause destitution and Home Office contractors operating in Wales deliver on their contractual responsibilities
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Recommendation 9: Establish effective cross-sector partnership working and mutual accountability for coordination and effective use of resources to increase the number of bedspaces supporting refused asylum seekers on their pathways out of destitution	
Task(s) involved	<p>9.1. Agree membership and terms of reference of a working group to ensure coordination between organisations and sectors in delivering these recommendations and any WG resources invested in them, as well as other relevant resources available, for example, the Oak Foundation funded Welsh Refugee Council housing project</p> <p>9.2. Ensure links between housing and homelessness, refugee and asylum and immigration advice sectors (see Section 7.7)</p> <p>9.3. Develop and sustain links between hosting and accommodation projects</p> <p>9.4. Liaison between WG and other key partners to coordinate and feed in to evidence gathering and monitoring arrangements (see Recommendation 8)</p>
Resources needed	A commitment from relevant bodies and agencies to participate in coordination activities
Lead organisation/individual	Welsh Government Equality team working with the Welsh Refugee Coalition
Who else needs to be involved	<p>Welsh Refugee Council</p> <p>Welsh Refugee Coalition and its members</p> <p>Tai Pawb</p> <p>Housing Justice Cymru</p> <p>Home4U</p> <p>ShareDydd</p> <p>Share Tawe</p> <p>WSMP</p> <p>NRPF Network</p> <p>WLGA</p> <p>Public Health Wales</p> <p>British Red Cross</p>

	NACCOM
Timeframe	Review as part of funded development work and associated timeframes
Intended outcomes	<p>Effective cross-sector partnerships which grow bedspaces available to improve pathways out of destitution</p> <p>Organisations playing to their strengths in order to maximise impact of resources (money, people and other assets)</p> <p>Effective sharing of information, knowledge and learning from implementation of all recommendations made in this report and from the delivery of relevant projects/initiatives</p>

7.7. About the delivery organisations and networks

To promote cross-sector working and the engagement of sectors and organisations that thus far have not been very involved in supporting refused asylum seekers out of destitution we have also set out an overview of ways in which different players can contribute.

It would be productive to raise awareness of the Nation of Sanctuary Plan within all these organisations and networks.

Sector/ organisations	Proposed contributions / roles	Coordinating bodies and key organisations
Housing associations	<ul style="list-style-type: none"> • Donate properties at zero or peppercorn rent • Provide from own stock or secure (via private sector) properties to let (for mixed housing models – See Recommendation 4) • Partner with asylum and refugee support groups to deliver models of accommodation • Partner with asylum and refugee support groups to provide housing management support • Partner with asylum and refugee support groups to provide infrastructure support, such as back office support – HR, ICT expertise etc • Promote hosting within organisation • Promote charitable giving from staff to asylum and refugee support charities 	<p>CHC</p> <p>CIH Cymru</p>
Voluntary housing and professional bodies	<ul style="list-style-type: none"> • Partner with asylum and refugee support groups to develop capacity and models 	<p>Tai Pawb</p> <p>Housing Justice Cymru</p>

	<ul style="list-style-type: none"> • Broker partnerships between housing and homelessness organisations and asylum and refugee support organisations • Raise awareness about signposting to support pathways out of destitution • Influence policy and practice to achieve changes which support pathways out of destitution • Promote individual giving of donations of money and/or goods, time and expertise (professional bodies in particular) 	Shelter Cymru Crisis NACCOM CIH Cymru Cymorth Cymru/End Rough Sleeping Cymru coalition
Faith groups	<ul style="list-style-type: none"> • Donate properties at zero or peppercorn rent • Provide or help to secure properties to let (for mixed model) • Support and promote hosting through networks • Promote charitable giving to asylum and refugee support charities 	Housing Justice Cymru Faith Communities Forum Interfaith Council Other Faith groups and networks to be identified
Asylum and refugee support groups	<ul style="list-style-type: none"> • Partner with housing associations to develop shared housing models • Partner with housing and other relevant bodies to ensure links to good quality immigration advice, advocacy and representation • Partner with housing associations to raise awareness of needs and solutions • Support engagement of people directly affected by destitution in development work 	Welsh Refugee Coalition British Red Cross NACCOM DPIA BAWSO
Public sector bodies	<ul style="list-style-type: none"> • Ensure all relevant front-line staff (in social services, housing options and homelessness assistance, hospitals and primary health care services) are aware of needs and rights of refused asylum seekers and aware of signposting options to support pathways out of destitution • Review if any areas of policy and practice set up unnecessary barriers to the recommended developments e.g. Welsh Housing Quality Standards (WHQS) 	WLGA WSMP NRPF Connect Public Health Wales Welsh Government

	<ul style="list-style-type: none"> Consider the positive benefits of closer partnership and support for voluntary groups involved in destitution, supporting their safeguarding efforts and being open to working together for mutual benefit 	
Funders (charitable and statutory)	<ul style="list-style-type: none"> Fund development of a strategic and sustainable response to supporting pathways out of destitution which could include consideration of: funding elements of the holistic support package and supporting the development of capacity in relevant organisations 	ACF (Wales Funders Network)

APPENDICES

APPENDIX 1 - Accommodating Refused Asylum Seekers - Sounding Board

Name & org	Organisation
Alica Zalesinska	Tai Pawb
Selina Moya	CHC
Emma Thompson	Shelter
Sharon Lee	Housing Justice Cymru
David Bacon	City of Sanctuary & ShareDYDD, Cardiff
Kathryn Williams	City of Sanctuary
Suzy Youngman	Home4U and ShareDYDD, Cardiff
Mark Seymour	The Gap, Newport
Anne Hubbard	WLGA
Cathrin Manning	British Red Cross, Wales
Holly Taylor/Tracy Sherlock	Welsh Refugee Council
Samsunear Ali	BAWSO
Sian Catherine Jones	Public Health Wales
Nick Morris	Crisis
Marilyn Thomas	Share Tawe
Bernadette Rainey/Ruth Brown	Asylum Justice
Dave Smith	NACCOM

APPENDIX 2 - List of interviews and consultation events

Sounding Board

Name and organisation SB = Sounding Board member *Attended SB 1/4/19	Organisation/role	Response/date of interview/meeting Notes available for all these meetings
John Davies	Welsh Gov. Commissioner of research	Set up meeting 18/2/19 Review meeting 29//3/19
Alicija Zalesinska (SB)*	Tai Pawb	19/3/19
Selina Moyo (SB)	CHC	20/3/19
Emma Thompson	Shelter Cymru	20/3/19
Sharon Lee (SB)*	Housing Justice Cymru and chair, WWHA	29/3/19
David Bacon (SB)*	ShareDYDD, Home4U, City of Sanctuary Cardiff	4/3/19
Suzy (SB)*	ShareDYDD & Home4U, Cardiff	21/3/19
Kathryn Williams (SB)*	City of Sanctuary, Swansea	26/3/19
Ruth O'Neill (see Suzy)	Space4U/Home4U, Cardiff	2/5/19
Mark Taylor (SB)*	The Sanctuary/The Gap, Newport	21/3/19
Anne Hubbard (SB)*	Wales SMP, WLGA	28/3/19
Cathrin Manning (SB)*	British Red Cross, Wales	18/4/19
Holly (SB)*/Tracey	Welsh Refugee Council & Welsh Asylum Rights Project	19/3/19
Samsunear Ali (SB)	CEO, BAWSO	No response
Sian Jones (SB)	NHS Wales	No response
Nick Morris (SB)*	Policy and Communications Manager, Crisis	21/3/19
Ruth Jacob	Senior Policy Officer, Crisis	18/3/19
Marilyn Thomas (SB)*	Share Tawe, Trustee	5/3/19
Hannah	Share Tawe	
Bernadette Rainey, Chair Ruth Brown, CEO (SB)*	Asylum Justice	Exchange of information by email
Dave Smith (SB)*	NACCOM, Network development (West side of UK)	5/3/19

Lead Officers Migration- Cardiff (Sian Sanders), Newport (Emmy Chater), Swansea (& Wrexham plus Emma Maher of SMP/WLGA	Rachel from Wrexham had to withdraw as tel line no good but see below	1/5/19
Newport consultation with people seeking sanctuary	Organised by Mark Taylor, The Gap, The Sanctuary drop-in, Newport	1/5/19
Rachel Morris & colleagues in Wrexham	Shirley Jones – Housing support and local lettings lead; Donna Powell – Caseworker for WRC, employed by BAWSO; Rachel Morris– Senior Performance Improvement and Partnerships Officer and lead for asylum seekers and refugees; apologies from Tracy Jones, Housing options/ homelessness	Meeting 13 May
Wrexham consultation with people seeking sanctuary	Organised by Cathrin Manning, BRC	13 May, Wrexham
Cardiff consultation with people seeking sanctuary	Organised by Suzy, Home4U/ShareDYDD	14 May, Cardiff, Cathays Methodist Church
Cardiff DPIA consultation with people seeking sanctuary	Organised by Sarah Allen	14 May, Cardiff, Trinity Centre
Lead Officers, Homelessness & housing options in 4 dispersal areas	Email sent requesting interview with background to project	Simon Rose Newport, 16 May, Wrexham (see above), Andrew James, Cardiff Emailed Steve Porter & Marie Muldoon
Swansea Share Tawe consultation with people seeking sanctuary	Consultation led by Share Tawe project coordinator with written feedback from participants	
Jim McKirdle	Housing Lead, WLGA	Email contact

**APPENDIX 3 - PROVIDING ACCOMMODATION FOR REFUSED ASYLUM SEEKERS:
LEGISLATIVE AND POLICY ISSUES (correct at point of research ending in July 2019)**

N.B. In response to the exceptional circumstances created by the Coronavirus pandemic, funding has been allocated by the Welsh Government to local authorities in order to secure accommodation for those sleeping rough and people living in inadequate temporary accommodation and this can be used to support people who are NRPF.

Issue	Legislation/policy	Source/weblinks	Comments
<p>Access to information and advice on preventing homelessness</p>	<p><u>England</u> Homelessness Reduction Act 2017 – Code of Guidance paragraph 3.1 - Local authorities must provide free advice and information about the help that is available for people who are homeless or threatened with homelessness, which everybody in the area can access, including people who are not eligible for further homelessness services as a result of their immigration status.</p> <p>Code of Guidance paragraph 7.2 – Housing authorities should refer applicants to appropriate support which they may be entitled to where relevant.</p> <p><u>Wales</u> Part 2 Housing (Wales) Act 2014 - S.60 - local authorities have a statutory duty to ensure there is a provision of a service to provide information, advice and assistance in accessing help to anyone in its area, or with a local connection to its area, who present to them for assistance, including people who are ineligible for other housing assistance under Chapter 2 of Part 2 of the Act.</p>	<p>English legislation http://www.legislation.gov.uk/ukpga/2017/13/contents/enacted</p> <p>English Code of Guidance https://assets.publishing.service.gov.uk/media/5a969da940f0b67aa5087b93/Homelessness_code_of_guidance.pdf</p> <p>Welsh legislation http://www.legislation.gov.uk/aw/2014/7/part/2/enacted</p> <p>Welsh Code of Guidance https://gov.wales/sites/default/files/publications/2019-03/allocation-of-accommodation-and-</p>	<p>There could be merit in strengthening the wording of the Code of Guidance to reinforce that access to information and advice is not restricted to those with certain immigration status and what this means in practice</p>

		homelessness-guidance-for-local-authorities.pdf	
Duty to refer	<p><u>England</u> On 1st October 2018, it became a legal requirement for social services in England to make a direct referral to a housing authority for assistance under part 7 of the Housing Act 1996 when a person they are supporting is homeless or is threatened with homelessness within 56 days. The new duty to refer is set out in the Homelessness Reduction Act 2017.</p> <p>The duty to refer will apply when a family or person with NRPF has been provided with accommodation under section 17 of the Children Act 1989, or the Care Act 2014, and becomes eligible for homelessness assistance. Such a situation may arise when a person or parent is granted leave to remain with recourse to public funds (which is the case for the majority of supported households), or when an EEA national starts working and establishes a right to reside under European law. At that point, the social worker or NRPF caseworker will usually issue the person with a notice that their temporary accommodation is due to end and must also make a direct referral to a housing authority.</p> <p><u>Wales</u> There is no duty to refer in Part 2 of the Housing (Wales) Act 2014</p>	<p>NRPF Network http://www.nrpfnetwork.org.uk/News/Pages/duty-to-refer.aspx</p>	<p>A review of priority is underway. If the Welsh Government is minded to consider a change in the law, it could be an opportunity to include amendments to Part 2 of the Housing (Wales) Act 2014 including introducing a duty to refer</p>
Access to housing association accommodation	<p><u>England and Wales</u> A person with NRPF can rent a property from a housing association if they have applied directly to the housing association rather than through their local council's housing allocations list. An allocation of a housing association property will only be considered to be a public fund if it has been obtained through the council's list or through a referral from a local authority.</p>	<p>NRPF network and Public Funds guidance Jan 2019 (based on Immigration Rules) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/772305/Public_funds_v14.0ext.pdf</p>	<p>This needs communicating clearly to housing associations in relation to any models of accommodation that include refused asylum seekers and also speaks for strategic links with local authorities but no formal referral arrangements</p>

Eligibility for homelessness assistance	Under both the Homelessness Reduction Act 2017 and Part II Housing (Wales) Act 2014, providing prevention or relief of homelessness and rehousing is deemed a public fund (see above for exception around housing association accommodation accessed directly).	Immigration Rules	Crisis attempted to get homelessness prevention and relief exempted during the development of the Homelessness Reduction Act but were not successful
Support funded through Supporting People/Housing Support Grant	<p><u>England</u> There is no longer a ring-fenced Supporting People grant in England.</p> <p><u>Wales</u> Supporting People is now part of Housing Support Grant which is not currently a public fund</p>	Immigration Rules	There is an opportunity during the development of the guidance for Housing Support Grant to clarify that it is not deemed a public fund
Protection of families with children	<p><u>England</u> For children and families with NRPF, assistance provided by Local Authorities under section 17 of the Children Act 1989 has been recognised by the government and courts as being an essential safety net to protect the most vulnerable people from destitution</p> <p><u>Wales</u> The Social Services and Wellbeing Act 2014 no longer includes Section 17 of the Children Act 1989 and there is no detailed guidance to ensure the function of this section, or its replacement is implemented</p>	Briefing paper on NRPF by Emmy Chater	There are opportunities to expand and clarify guidance for local authorities on assistance to be provided by local authorities to families with children where their asylum application has been refused in line with the guidance provided to English authorities
Protection of vulnerable adults	<p><u>England</u> Care Act Section 18 – duty to meet needs for care and support.</p> <p><u>Wales</u> As with the Care Act, support under Social Services and Well-being (Wales) Act 2014 is not a public fund.</p>	As above plus http://www.legislation.gov.uk/ukpga/2014/23/section/18/enacted	As above, there is an opportunity to expand and clarify guidance on the protection of vulnerable adults who have had their asylum applications refused in

	<p>The Social Services and Wellbeing (Wales) Act 2014 requires a local authority to undertake an assessment where it appears that a person may have needs for care and support, but stipulates in sections 19(2)(a) and (b) that a local authority will only have a duty to meet a person’s eligible needs for care and support where: an adult who is ordinarily resident in the authority's area, and any other adult who is within the authority's area.</p> <p>According to the NRPf guidance for adults, the Care Act provides details of specific categories of people who should be considered as ‘ordinary resident’, such as hospital inpatients, out of area placements, section 117 aftercare placements, people in detention and on release, and carers. Unlike the Care Act, The SSWb Act does not clarify various categories; legal advice should be sought to clarify LA obligations for these categories.</p> <p>NRPf guidance notes that Statutory Guidance in England states that local authorities must not delay the process of meeting needs where ordinary residence is not certain; there appears to be no such reference in Welsh Statutory Guidance.</p>	http://guidance.nrpfnetwork.org.uk/reader/practice-guidance-adults/	line with the guidance provided to English authorities
Shared houses	<p>The regulations on Houses in Multiple Occupation are the same in England and Wales (Housing Act 2004)</p> <p>Buildings managed by housing associations are exempt for the purposes of the application of licensing</p>	<p>Legal article on HMOs and licensing in Wales</p> <p>https://law.gov.wales/publicservices/housing/HMO-and-Licensing-in-Wales/?skip=1&lang=en#/publicservices/housing/HMO-and-Licensing-in-Wales/?tab=overview&lang=en</p>	
Tenancy law	<p><u>Wales</u></p> <p>Renting Homes Act (yet to be enacted and timescale for this unclear although not likely to be before 2021) – reforms tenancy law – creates a standard contract (modelled on the current assured shorthold tenancy) and</p>		If there is a concern about issuing a tenancy agreement to someone with NRPf – as long as the housing

	<p>a secure contract (modelling on the local authority secure tenancy) – with variations on these for supported accommodation.</p> <p>Renting Homes will require all landlords to issue a written statement of the occupation contract to the tenant or licensee (termed ‘contractholders’ in the Act).</p> <p>It also requires landlords to ensure that the property is fit for human habitation at the time of occupation and for the duration of the tenancy contract. Fitness will be determined by reference to regulations which must be made under the Act.</p>		<p>association has allocated the property directly, this should not be an issue.</p> <p>Fitness for human habitation regulations could have an impact on schemes which seek to use accommodation on a temporary basis.</p>
Discretionary Assistance Fund	<p>Processes for destitute people (including those who are NRPF) to access Emergency assistance payment - to qualify people must meet the following criteria:</p> <ul style="list-style-type: none"> - have experienced an emergency or disaster - be resident in Wales - be at least 16 years old - have no access to other money and tried all other affordable sources of funding <p>Individual assistance payment eligibility includes being in receipt of one of a range of benefits</p>	<p>https://gov.wales/discretionary-assistance-fund-daf/eligibility</p> <p>https://welshrefugeecouncil.org/migration-information/legal-briefings/migrants%E2%80%99-entitlements-to-welfare-benefits-in-wales</p>	<p>Unlike in England, Scotland and Northern Ireland, in Wales destitute asylum seekers can access this discretionary fund</p>
Other relevant legislation in Wales	<p>Well-being of Future Generations (Wales) Act</p> <p>Five ways of working outlined in the Act – long-term, prevention, integration, collaboration and involvement.</p>	<p>http://futuregenerations.wales/about-us/future-generations-act/</p>	<p>Provides a useful framework</p>

Other issues

Supporting People (now Housing Support Grant) funded provision for refugees (funding for support – either accommodation-based or floating support)

Difficult to pin down current Supporting People/Housing Support Grant-funded provision for refugees but there is very little specific provision in the four dispersal areas; only documents produced by the North Wales Regional Collaborative Committee specifically mention refugees and this is not current provision. A move to generic floating support services may be a significant factor in this lack of specific provision. In addition, provision by organisations like the Salvation Army in Cardiff can be accessed by refugees alongside other groups.

This sits alongside the lack of accommodation provision specifically for refugees identified by Joy Kent in her work for Tai Pawb.

Shared accommodation

Newydd Housing Association was part of a Crisis project on sharing. Newydd project was called rooms4u – final report is now available <https://www.newydd.co.uk/news/changing-the-face-of-shared-housing>. Much of the work/thinking on sharing was stimulated by the threat of Local Housing Allowance rates applying to HAs – since that threat has gone away, less has been done.

Exempt/specified accommodation

Where accommodation is identified as exempt, it provides an exemption from Universal Credit, the benefit cap and the bedroom tax – housing costs are claimed via Housing Benefit (even though someone might be a UC claimant for the rest of their income) – so can include enhanced housing management and service charges (UC is much more restrictive in relation to service charges) – so this is becoming more important as UC is rolled out. A category of specified accommodation was introduced in the context of UC – there are 3 sub categories, one of which is accommodation where care, support or supervision is provided by someone who is not the landlord or on their behalf. Not all specified accommodation in this category will be defined as exempt and if accommodation is not exempt, local housing allowance will apply (it is anticipated that around 80% of specified accommodation in this category will be exempt).

For supported accommodation and hostels, it is straightforward to get identified as exempt. For other types of accommodation, it can be difficult. LAs implement DWP guidance but do it differently. Issues around, e.g. who is providing the care, support or supervision, become complex where there are a number of different players or where commissioning is complex. It is an area in which Welsh Govt has limited control/influence although it is aware of the issues and the different interpretations by different LAs. The overriding issue appears to be anxiety from within local authorities about the DWP audits of subsidy claims.

Homelessness strategies

Swansea homelessness strategy action plan (<https://www.swansea.gov.uk/article/46707/Launch-of-a-new-Homelessness-Strategy>) includes the following actions:

- develop housing advice information specifically for refugees
- map provision in place to assist and advise individuals who are ineligible for homelessness and housing assistance.

Cardiff homelessness strategy (<https://www.cardiff.gov.uk/ENG/resident/Housing/Homeless-or-at-risk/Homelessness-Strategy/Pages/default.aspx>) includes the following:

- commitment to 'Review specialist pathways into services to ensure they are working effectively' – specialist pathways includes refugees

Gwent (includes Newport) strategy action plan

(<https://democracy.newport.gov.uk/documents/s14279/App%202.pdf>) includes the following:

- to provide an appropriate range of support services for refugees and asylum seekers – will be undertaking a review

North Wales regional homelessness strategy (includes Wrexham)

(<https://www.denbighshire.gov.uk/en/your-council/strategies-plans-and-policies/housing-strategies/north-wales-regional-homelessness-prevention-strategy-2018-2022.pdf>)

- makes no mention of refugees or asylum seekers at all

Empty homes

The National Assembly for Wales Equality, Local Government and Communities Committee are undertaking an inquiry in empty homes

<http://senedd.assembly.wales/mgIssueHistoryHome.aspx?IId=25057>. It is examining:

- The extent to which empty properties impact on the supply of affordable housing in Wales;
- The impact of empty properties on communities in Wales and challenges faced by local authorities dealing with the problem;
- The extent to which local authorities have the legislative powers they need to deal with empty properties;
- Examples of best practice in turning empty properties into affordable, energy efficient homes;
- The extent to which the changes introduced by the Housing (Wales) Act 2014 giving local authorities discretion to charge council tax premiums on empty homes have been utilised, and the effectiveness of this policy.

The evidence gathering stage ended on 31 May 2019. The report of the inquiry was published in October 2019 <https://www.assembly.wales/laid%20documents/cr-ld12797/cr-ld12797%20-e.pdf>.

APPENDIX 4 - TERMINOLOGY

Asylum seekers and refugees The legal definitions are provided in Box 1.

Asylum support (or Section 95 support) Mainstream support for asylum seekers who would otherwise be destitute, which is provided until the case is fully determined by the Home Office or Appeal Courts. Most of the accommodation provided as part of this support is provided outside London and the South East in dispersal areas, via Home Office accommodation/support contracts which were retendered last year with new contracts (some to new providers) currently being established. This support continues if there was a child in the household under 18 years when the final decision was made. Financial support is provided as cash payments which are set below basic social security levels and may be applied for separately if alternative accommodation is available. See also Section 4 support below.

Destitution The definition under s95 of the Immigration and Asylum Act 1999 - A person is destitute if: 'a. he does not have adequate accommodation or any means of obtaining it (whether or not his other essential living needs are met); or b. he has adequate accommodation or the means of obtaining it, but cannot meet his other essential living needs.'

The definition developed by researchers and authors of the JRF report 'Destitution in the UK' incorporating all groups defined people as being destitute if they, or their children, have lacked two or more of six essentials (shelter, food, heating, lighting, clothing/footwear and basic toiletries) over the past month, because they cannot afford them: or, their income is so extremely low that they are unable to purchase these essentials for themselves.³⁸

Houses in Multiple Occupation (HMOs)

A property rented by at least three people who are not from one 'household' (e.g. a family) and share facilities such as a bathroom/kitchen.

Hostels

Non-self-contained accommodation providing bedspaces on a longer-term basis than nightshelters. Hostels charge residents but some may make some space available for those with no access to benefits.

Hosting

Both formal and informal arrangements whereby a destitute migrant is given a room (and probably other support) in someone's home on a non-paying basis.

Migrants and 'new' or 'recent' migrants

Migrants are those who enter the UK intending to stay for a specified or longer period of time.

No recourse to public funds (NRPF)

'Public funds' is a specific and limited legal term used in immigration law. 'No recourse to public funds' (NRPF) is a commonly used term, often misunderstood as applying to public services generally when in fact its meaning is limited. The meaning is presented more fully in Box 2 on page 3.

³⁸ <https://www.jrf.org.uk/report/destitution-uk-2018>

Support for refused asylum seekers (or Section 4 support)

Limited accommodation and subsistence support given to refused asylum seekers if they can show there is a temporary barrier preventing them from leaving the UK. This support is usually applied for by single people, but families may apply for it if they did not ever previously get, or continue to receive, Section 95 support (because there was no child in the household at the time they received their final decision). It was originally meant as a short-term mechanism for people about to leave the country (under Section 4 of the Immigration and Asylum Act 1999 hence often being called 'Section 4 support'). Unlike Section 95 support, the subsistence help is provided, not in cash, but in the form of vouchers which cannot be applied for separately if there is alternative accommodation available.

Section 17 support (England only – see Appendix 3 for equivalent provision in Wales under the Social Services and Well Being Act)

The Children Act 1989 (Section 17) requires local authorities in England to safeguard and promote the welfare of children 'in need', within their families, including a child whose parents have 'no recourse to public funds' (NRPF). A child is 'in need' if unlikely to achieve or maintain a reasonable standard of health or physical, intellectual, emotional, social or behavioural development, or is disabled. A destitute child is a child in need for the purposes of s17.

Section 18 of the Care Act (England only – see Appendix 3 for equivalent provision in Wales under the Social Services and Well Being Act)

This covers individuals with a care need in England which could include migrants who have no recourse to public funds.

Shared house

Accommodation provided in a single property which is shared; some providers of accommodation for destitute migrants have separate houses and some have houses that accommodate migrants and others who can pay rent, and migrants who cannot, on an organised basis.

Sofa-surfing

Staying with friends, community members or family on a temporary/short-term basis.

Trafficking

Human trafficking is the acquisition of people by improper means such as force, fraud or deception, with the aim of exploiting them. This is a brief and partial definition of trafficking, a term that is given greater content in EU and international instruments.

APPENDIX 5 - INFORMATION ABOUT EXISTING PROVIDERS AND THEIR PROVISION (*researched in sept 2018*)³⁹

<i>Organisation, mission & focus</i>	<i>Housing & financial model supporting destitute migrants</i>	<i>Access to decent properties in suitable location</i>	<i>Housing management provision</i>	<i>Referrals & occupancy</i>	<i>House sharing & whether accommodate NRPF & paying residents in same house</i>	<i>Access to immigration advice</i>	<i>Access to holistic support incl. basic needs, ESOL move-on</i>	<i>End of immigration process</i>
<p>Action Foundation <i>Newcastle, Gateshead & Sunderland</i></p> <p>Supports refugees, asylum seekers and other migrants experiencing isolation in Tyne and Wear and provides opportunities to help them overcome their exclusion. It runs Action Lettings (housing for rent) and Action Housing and Action Hosting targeted at those who are destitute with NRPF.</p>	<p>Properties secured mainly from supportive individual owners/landlords (l'lords). Purchased 1 property using SI from Commonwealth</p> <p>Housing benefit (HB) income for around 60 bedspaces per year includes higher rate based on 'exempt' status & covers:</p> <p>Contribution towards:</p> <p>16 'free' spaces per year plus</p>	<p>20 houses in Newcastle, Gateshead, Washington & Sunderland</p>	<p>Experienced housing manager & resident support workers</p> <p>Intensive supported housing management</p> <p>Repairs, maintenance, utilities & 24 hr cover</p>	<p>Asylum seekers and refugees.</p> <p>Local refugee groups refer. Provision for destitute clients focuses on most vulnerable</p>	<p>Yes</p> <p>Do not mix NRPF and paying residents nor genders in the same house</p>	<p>No – Refer to partner agencies</p> <p>Potential OISC level 1 or 2 to be developed in house in near future</p>	<p>Yes – high level of supported housing provided to meet exemption requirement incl. move-on support to permanent housing</p>	<p>Provide information on voluntary return services and refer on if appropriate</p>

³⁹ Hutton C., Lukes S., & Petch H. Housing Destitute Migrants: Lessons from a Pilot Project 2015 – 2018. Commonweal Praxis, 2019

APPENDIX 5 - INFORMATION ABOUT EXISTING PROVIDERS AND THEIR PROVISION (researched in sept 2018)³⁹

<i>Organisation, mission & focus</i>	<i>Housing & financial model supporting destitute migrants</i>	<i>Access to decent properties in suitable location</i>	<i>Housing management provision</i>	<i>Referrals & occupancy</i>	<i>House sharing & whether accommodate NRPF & paying residents in same house</i>	<i>Access to immigration advice</i>	<i>Access to holistic support incl. basic needs, ESOL move-on</i>	<i>End of immigration process</i>
	<p>7 in hosting scheme (only established in 2016/17 & is growing).</p> <p>Contribution to overheads (Lettings – 45% & destitution project – 20%)</p> <p>Additional grant funding raised for some costs</p>							
<p>Boaz Trust</p> <p><i>Greater Manchester</i></p> <p>Exists to support people who have become homeless at some point in the asylum system with an emphasis on helping asylum seekers out of destitution. Developed refugee housing project to support this mission</p>	<p>14 houses are donated by sympathetic individual donors for peppercorn rent. Others rented including 3 from Green Pastures (a Christian Social Investor) and 2 from Arawak</p>	<p>19 houses currently in Manchester (17) & Salford (2). Soon-to-be one in Bolton rented from Bolton at Home.</p>	<p>Housing Manager</p> <p>Arawak Walton HA provide housing management incl. rent collection for a £550 per house fee per</p>	<p>Asylum seekers and refugees.</p> <p>Referrals from 23 orgs. Current waiting list 150</p>	<p>Yes</p> <p>Separate refugees paying rent & destitute asylum seekers</p>	<p>Yes. Used to retain legal adviser (not actually employed) but now have 1 day a week drop in from Greater Manchester</p>	<p>Yes- 1 FTE Support manager and 2.8 FTE support workers (1.6 FTE for 40 refused asylum seekers & 1.2 for 30 refugees) = caseload of 4.5 per day incl</p>	<p>Provide information on voluntary return</p>

APPENDIX 5 - INFORMATION ABOUT EXISTING PROVIDERS AND THEIR PROVISION (researched in sept 2018)³⁹

<i>Organisation, mission & focus</i>	<i>Housing & financial model supporting destitute migrants</i>	<i>Access to decent properties in suitable location</i>	<i>Housing management provision</i>	<i>Referrals & occupancy</i>	<i>House sharing & whether accommodate NRPF & paying residents in same house</i>	<i>Access to immigration advice</i>	<i>Access to holistic support incl. basic needs, ESOL move-on</i>	<i>End of immigration process</i>
	<p>Walton Housing Association (HA)</p> <p>20% of Boaz income from refugee housing and support.</p> <p>Client support mainly charitable grant funded</p> <p>Income from renting 28 rooms (in total) to 15 male refugees & 13 female refugees covers: approx.</p> <p>56% of cost of spaces for 43 destitute asylum seekers (24 male, 19 female)</p>	<p>Some properties treated as HMOs/licenced</p>	<p>year (pays for Arawak Walton to employ 0.5% f/t equivalent rent collector)</p> <p>Maintenance, utilities & 24 hr cover</p>			<p>Immigration Advice Unit</p>	<p>move-on support</p> <p>For destitute clients with no means of support, £10 per week plus money for travel costs to specific meetings / appointments as needed</p>	

APPENDIX 5 - INFORMATION ABOUT EXISTING PROVIDERS AND THEIR PROVISION (*researched in sept 2018*)³⁹

<i>Organisation, mission & focus</i>	<i>Housing & financial model supporting destitute migrants</i>	<i>Access to decent properties in suitable location</i>	<i>Housing management provision</i>	<i>Referrals & occupancy</i>	<i>House sharing & whether accommodate NRPF & paying residents in same house</i>	<i>Access to immigration advice</i>	<i>Access to holistic support incl. basic needs, ESOL move-on</i>	<i>End of immigration process</i>
<p>Dass Project <i>Glasgow, Scotland</i></p> <p>Partnership led by the Refugee Survival Trust with Scottish Refugee Council, British Red Cross, University of Strathclyde Law Clinic to assist refused asylum seekers who are Appeal Rights Exhausted (ARE) & NRPF to find a route out of destitution and resolve their situation.</p>	<p>22 night places for men via Glasgow Nightshelter.</p> <p>8-10 bedspaces available via 4 properties: 1 2- bed donated (all costs covered) by retired members of Castlemilk Community Church and Furniture ministry; 1 2-bed donated by a supporter and fundraising covers running costs; 1 2-bed rented from Queens Cross HA & another 2-bed pending (fundraising for rent & running costs).</p>	<p>Properties in reasonable locations.</p> <p>HA property in good location.</p> <p>Awareness of risk of reliance on individual supporter whose circumstances could change</p> <p>1 4-bed property purchased by social investor Green Pastures has to be handed back.</p>	<p>DASS staff</p>	<p>Engagement in immigration advice is basis for referral via partners in the destitution network & self-referral or through a drop-in at the Scottish Refugee Council</p> <p>Bedspaces targeted at cases with high chance of success but may need accommodation for 1-2 yrs</p>	<p>All residents NRPF.</p> <p>Poor experience of more than 2 sharing so targeting 2 bed properties in growth of housing options.</p>	<p>Referrals required to engage in case. 2 volunteers from Strathclyde Law Clinic (law students) provide advocacy support</p>	<p>Model of holistic support with immigration advice at the centre & accommodation & cash handouts to meet basic needs and facilitate engagement with case</p>	<p>Rigorous assessment of merits of case and refer for voluntary return advice as appropriate.</p>

APPENDIX 5 - INFORMATION ABOUT EXISTING PROVIDERS AND THEIR PROVISION (researched in sept 2018)³⁹

<i>Organisation, mission & focus</i>	<i>Housing & financial model supporting destitute migrants</i>	<i>Access to decent properties in suitable location</i>	<i>Housing management provision</i>	<i>Referrals & occupancy</i>	<i>House sharing & whether accommodate NRPF & paying residents in same house</i>	<i>Access to immigration advice</i>	<i>Access to holistic support incl. basic needs, ESOL move-on</i>	<i>End of immigration process</i>
	Fundraising for rents is a challenge.							
<p>Hope Projects</p> <p><i>Birmingham & West Midlands</i></p> <p>Hope exists to overturn flawed refusals of asylum. Housing, together with financial support and legal advice, are the 3 pillars of its approach to achieving this</p>	<p>Most of 12 properties secured from housing associations & individuals at ground/peppercorn rent levels</p> <p>Mainly grant funded</p> <p>38 destitute asylum seekers housed out of 60 supported with cash from Hope Projects</p>	<p>12 houses in Birmingham</p> <p>Use of 2 spaces in Wolverhampton</p>	<p>2 part-time Housing Support Workers</p> <p>Utilities & maintenance incl quite a lot of DIY & resident engagement</p>	<p>Only destitute asylum seekers.</p> <p>All referrals from Hope Steering Group. The referral agency continues to provide support.</p> <p>Cases with best chance of success housed</p>	Yes	Yes employ 1 F.T. legal rep.	<p>Yes - mix of Hope support and continued support of referral agency</p> <p>Group work & peer support encouraged</p> <p>Cash payment provided from fundraised income</p>	<p>Advice on voluntary return</p> <p>Services BUT only take on cases with highest chance of success</p>
<p>Nottingham Arimathea Trust</p> <p><i>Nottingham, Nottinghamshire and Derby</i></p>	<p>HB income includes higher rate based on exempt status.</p> <p>8 shared houses (7 in Nottingham and in Derby), of these:</p>	<p>Seek properties mainly in the NG7 area of Nottingham – particularly close to Hyson Green as this is</p>	<p>Repairs, maintenance & utilities</p>	<p>Referrals from Nottingham & Nottinghamshire Refugee Forum (NNRF), British Red Cross, Derby Refugee Advice</p>	Yes – see previous in column 1	<p>Working on getting OISC accreditation currently. Aiming to</p>	<p>Holistic Support is based around the ‘Outcomes Star’ model and action planning.</p>	

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Provides supported housing for destitute asylum seekers, newly recognised refugees, and migrants that are victims of trafficking or modern slavery.	<p>-6 are shared between refugees and asylum seekers</p> <p>-2 entirely for destitute asylum seekers (may mix in future).</p> <p>2 family homes for refugees.</p> <p>9 x 1 bedroomed flats for refugees which house singles, couples and small families</p> <p>1 destitute asylum seeker living in a sustainable community in the county of Nottinghamshire.</p>	the preferred location for most asylum seekers and refugees in Nottingham. Properties also in NG2, as this was available, met the needs and is a 2nd preferred location for refugees and asylum seekers.	<p>5 staff including:</p> <p>Support Worker</p> <p>Housing Manager</p> <p>Resettlement Officer</p> <p>Deputy CEO and CEO</p> <p>All staff participate in duty rota system (24 hr)</p>	<p>Centre, and Street Outreach Team</p> <p>Occupancy is usually around 98-99% however currently have an unusual contract which is reducing occupancy</p>		provide level 1 initially	<p>ESOL Women's group.</p> <p>1 Support Worker & 1 Resettlement Worker</p> <p>Resettlement support for all refugees & people who have survived modern slavery/human trafficking</p> <p><i>All staff have experience and collaborate to support the needs of residents. Staff have allocated case loads</i></p>	

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	<p>Properties are leased below market rent from:</p> <p>4 from HAs</p> <p>2 Anglican Diocese</p> <p>5 PRS</p> <p>9 flats from Christian social investor Green Pastures</p> <p>1 free bungalow</p>							
<p>Open Door North East (ODNE)</p> <p><i>Middlesbrough (M'boro) & Stockton</i></p> <p>Provides a range of services supporting the wellbeing, livelihoods and integration of those seeking sanctuary in</p>	<p>35 houses – 3 owned; 2 privately owned & rent free; 1 rent free from an RSL; and 29 privately owned & managed by ODNE as a social lettings' agent for a management fee of</p>	<p>31 houses in M'boro & 4 in Stockton (asylum dispersal areas).</p> <p>ODNE have focused on procuring houses in areas</p>	<p>2 and ½ staff including experienced private sector housing manager</p>	<p>From drop-in service & local agencies</p>	<p>Yes</p> <p>3 shared houses have a mix of NRPF and those paying rent. The others are either all NRPF or all refugees.</p>	<p>Yes signposting to specialists but need greater capacity & working towards 2 staff gaining OISC level 1</p>	<p>Drop-in service including women only drop in</p> <p>Weekly food and cash on bank holidays</p> <p>Weekly cash</p>	<p>Provide information on voluntary return</p>

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the UK. Began housing refugees in order to cross subsidise accommodation for Asylum Seekers left with NRPF	<p>8.5 to 15% of the gross rental income.</p> <p>House 96 refugees, 16 NRPF asylum seekers & 2 EU migrants</p> <p>Costs of housing 16 destitute asylum seekers covered by rental income from refugee/migrant lets</p> <p>Recently provided 2 spaces under S18 Care Act and S17 housing for 2 destitute migrant families which contributes to income stream</p>	such as central M'boro (TS1) which is preferred by refugees to more suburban areas	Repairs, maintenance & utilities		Some houses are refugee/migrant houses on assured short hold tenancies with no sharing other than family members.		<p>from another provider.</p> <p>Cash help for appointments costs</p> <p>Move on support (although some housing is potentially permanent)</p>	
Praxis	Social investment (SI) to purchase 7	7 houses in 2 outer London	1 Housing Manager & 1	9 LAs	Yes	Yes, 0.4 Full Time	Yes incl.	Provide information

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<p><i>London</i></p> <p>Provides holistic services to migrants that “recognise that people bring strengths and that whilst needing specialist legal advice, accommodation and support, service users can also become agents of change.”</p>	<p>houses. Commonweal leads SI partnership (p’ship)of 4 charitable social investors, bears risk & subsidises rents</p> <p>Local Authority (LA) fees for Section 17 (S17) clients helps to support:</p> <p>At least 3 ‘free’ bedspaces at any one time (14 destitute women over 3 yrs)</p> <p>Contribution to overheads of 35%</p> <p>Additional grant funding raised for some costs</p>	<p>boroughs providing 18 bedspaces (Croydon & Redbridge)</p> <p>A 3 bed house leased at below market rent from a supporter and used for non S17 residents only)</p>	<p>Support Worker (days)</p> <p>Repairs, utilities & maintenance & 24 hr call service</p>	<p>Praxis & Red Cross for destitute spaces</p>	<p>Most non S17 women in Lebanon Rd but do mix</p>	<p>Equivalent (FTE) immigration adviser</p>	<p>Cash payment of £25 per wk for non S17 cases</p> <p>Praxis group work</p> <p>Support for transition when leaving project</p>	<p>on voluntary return services</p>

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<p>King's Arms Project <i>Bedford</i></p> <p>King's Arms Project Bedford delivers services to empower people on their journey out of homelessness, providing outreach, accommodation and opportunity to help people out of poverty. It believes that there is no such thing as a hopeless case. "We refuse to give up on anybody and believe that every homeless person can have a bright future."</p>	<p>18 nightshelter bedspaces and 25 Move-On Housing bedspaces for single homeless people, and one house (4-bedspaces) for NRPF clients fully funded by the Ministry for Housing Communities & Local Government's 'Controlling Migration Fund' (awarded via the LA). Acuteness of EEA homelessness problem in the area attracted special resources (25 rough sleepers in Bedford NRPF, majority EEA)</p>	<p>Lease properties from private landlords for single homeless and NRPF provision.</p> <p>Challenges re costs and location including some local opposition</p> <p>Partnership with HA and local community for refugee resettlement and community sponsorship schemes</p>	<p>Costs of housing management incl. maintenance, & utilities fully covered by grant</p>	<p>Through local rough sleepers initiative/outreach teams</p>	<p>Yes</p> <p>Migrant NRPF houses are separate from other homelessness provision</p> <p>New LA funded scheme will include couples.</p>	<p>No - Refer on to Bedford Refugee & Asylum Support</p>	<p>Yes with an emphasis on engagement with ESOL & employment training service.</p> <p>Move-on support</p> <p>Currently exploring how support needs & context will differ for people with no right to work e.g. asylum seekers & other non-EEA migrants & for EEA migrants post Brexit</p>	<p>Reconnection services is voluntary for EEA migrants. Many have been in UK for significant period of time & have refused previous offers of reconnection support before coming to King's Arms Project</p>

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	<p>LA funding of additional 8 rooms from 01/10/2018 will provide bedspaces for, in total, 14 NRPF with the right to work i.e. EEA nationals migrants (with 2 rooms available for couples)</p> <p>Involved with Syrian Resettlement and Community Sponsorship. Exploring local need and model of provision for destitute asylum seekers with NRPF plus those leaving nearby Yarlswood Detention Centre</p>							

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<p>Metropolitan Thames Valley Housing & Migration Foundation (MTVH)</p> <p>London, South East & Midlands</p> <p>Large, recently merged housing group which owns/manages 57K homes and includes a supported housing arm. It also has a fund –the Migration Foundation – which is restricted for migrant beneficiaries and is funding innovation in service provision for migrants with a specific interest in vulnerable and destitute migrants.</p>	<p>Property belongs to MTVH, and the service is currently fully funded by the Migration Foundation.</p> <p>N.B. The Foundation is also exploring provision for 20 Section 17 destitute migrant families in Derby to demonstrate within the organisation that there is a market for their expertise in providing migrant housing and support services and that not all provision in this area of need has to</p>	<p>1 x 10 bedroomed house for migrants, refugees and asylum seekers with no recourse to public funds in an area of high need in Derby.</p>	<p>3 members of staff, including a project manager</p>	<p>Referrals from local charities</p>	<p>Yes</p>	<p>Most clients already have legal representation (i.e. asylum seekers submitting a fresh claim) or are receiving support from the referral organisation, but we are currently developing a partnership with a legal project to support us with more complex cases.</p>	<p>The project offers a small hardship grant, receives food donations from local businesses, supports residents who want to volunteer or access employment, and offers opportunities to socialise and play sports. Residents supported to move into more sustainable tenancies in the</p>	<p>Advice on voluntary return when resident is running out of options in terms of fresh claims / new evidence not being forthcoming. We can also support clients who are going through this process, as it can take some months to gather all the necessary</p>

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	funded out of charitable sources.						area, once they are ready to do so.	paperwork to return the country of origin.
<p>St Mungo's</p> <p><i>London, the south east and west and the Midlands</i></p> <p>St Mungo's vision is that everyone has a place to call home and can fulfil their hopes and ambitions. It provides support directly to clients to prevent them becoming homeless, or to respond to it and help them recover; builds relationships with communities and the wider public, aiming to increase understanding of homelessness and empathy towards the people who</p>	23 bedspaces for NRPF non-EEA nationals receiving immigration advice from Praxis and Refugee action as part of the 'Street Legal' project. Bedspaces for people with no or low support needs only & funded through a mixture of sources, including the Big Lottery, the GLA (contract for services to tackle Rough Sleeping) &	Mungo's is a large provider of services to homeless people and owns some of its properties/has extensive access to leased private rented sector units. Mungos also arranges temporary 'meanwhile' use of some properties owned by social landlords which are awaiting	Usually provided in hostels Managed by Mungos from within existing resources incl repairs, maintenance & utilities costs	For Street Legal clients and referrals for Street Legal come from outreach teams across London and 'No Second Night Out' (NSNO) service	Hostel provision with shared facilities	Yes from Street Legal partners Praxis &/or Refugee Action	Yes as part of services to tackle rough sleeping	Advice on voluntary return

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<p>experience it ;and advocates for policy change by combining its clients’ voices with the organisation’s experience of what works.</p>	<p>unrestricted fundraised income from St Mungo’s</p> <p>19 bedspaces for a mix of EEA and non-EEA nationals with NRPF funded through the GLA & incl. 3 bedspaces suitable for people with higher support needs.</p> <p>Just starting 18 mth pilot of other ways to include NRPF bedspaces into existing projects using St Mungo’s fundraised income to fund 9 bedspaces & are in conversations with local commissioners</p>	<p>refurbishment or change of use</p>						

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	<p>at the moment to agree where these bedspaces can be offered within our existing stock.</p> <p>In addition exploring how to include NRPF bedspaces whenever reconfiguring existing buildings owned or occupied on a long lease. As part of this project we will soon have 3 NRPF bedspaces in a project in Southwark which will be available to the local outreach teams to refer into</p>							

