The Effects of UK Immigration, Asylum and Refugee Policy on Poverty: A Joint Inquiry by the APPG on Migration and the APPG and the APPG on Poverty

1. **What is your name?**

Stefan Robert

2. What organisation or institution are you answering on behalf of?

Migration Yorkshire

3. Which section of the migrant community is the main focus of your work?

(Asylum Seekers, Refugees, Migrants, Other, None)

4. From your experience do those in migrant communities struggle with their financial income and what specific policies contribute to this?

Through our work with partners from local authorities and the voluntary and community sector we are aware of how some migrant communities are more likely to experience financial difficulties, and this can be attributed to various government policies which place them at a disadvantage.

The 28 day move on period for newly granted refugees is a good example of how policy can contribute to the experience of poverty for migrants. Home Office policy is to terminate asylum support 28 days after the date of a grant of refugee status and due to the shortness of this notice period and its inconsistency with timescales for accessing welfare benefits (Universal Credit can take 35 days to process, Child Benefit can take up to 12 weeks), many newly granted refugees can find themselves experiencing destitution in some form at the end of the 28 day period. This has been repeatedly fed back by local authorities

supporting refugees during the move on period on our Refugee Integration Service project. Partners have consistently found that delays with the issuing of documentation from the Home Office creates additional challenges opening bank accounts and accessing services. The limited time window to 'move on' can increase the likelihood of a refugee experiencing poverty and that many new refugees accessing our services often have not secured permanent accommodation or are reliant on emergency support from local authorities or food banks while benefits are being processed when they exit the asylum support estate.

We also receive regular feedback from partners from the voluntary and community sector over the challenges faced by asylum seekers as a result of low asylum support rates. Asylum support rates are currently set at £47.39 per week, which is considerably lower than Universal Credit (currently £92 for single adults over 25 years old). These challenges are more evident for those who are accommodated in hotels and are in receipt of full

board support in place of cash support. Whilst the Home Office does issue a cash top-up of £9.58 per week to this group to help with transport and toiletries, this is still deemed too low as many asylum seekers have multiple complex needs requiring regular transport to appointments to see specialists such as around health, mental health and legal matters. A report from Asylum Matters in 2020 found that supported asylum seekers were living in poverty, with 84% reporting that they often didn't have enough food to eat as a result of managing a limited budget, unable to fully meet their needs (Asylum Matters: 2020).

Another contributing factor to some migrants' financial struggles is the lack of legal aid for immigration matters. The costs of paying for visa fees and immigration advice to regularise their stay can add additional financial pressures to migrants in the UK (it is worth highlighting that visa fees have recently increased substantially and that this is likely to cause further issues in the future for individuals). Many migrants are unable to meet the financial requirements to sponsor family members to join them,

and instead find they must send money overseas to their families to support them, thus adding further to their own financial hardship. Moreover, the lack of legal aid for matters such as refugee family reunion means that many refugees must save money to pay for representation to lodge applications to bring dependent family members to the UK. Due to the urgent nature of the refugee experience, this often results in many families borrowing money to pay for legal support as family members are often left behind in precarious situations such as in dangerous host countries or third countries where they are at risk or without rights and status.

5. Is the economic support available from the government adequate for those in migrant communities to support themselves and their families? If possible, please provide evidence.

There are discrepancies between and within migration routes. This is evident when comparing support packages across 'safe and legal routes' e.g. with the Homes for Ukraine Scheme integration support is available to help access benefits, employment and housing, but not for those on the Ukraine Family Scheme. This case study demonstrates the challenges faced where there is an absence of support:

The Y family came to the UK under the Ukraine Family Scheme. Their sponsor approached Wakefield Council to apply for the hosts' 'thank you payment' and the interim payment for guests but was advised that as the family did not arrive under the Homes for Ukraine Scheme, they were not eligible. The family were then given notice to leave the property but had insufficient income for a deposit and were unable to benefit from LA move on support. The Refugee Integration Service made an urgent referral for a homelessness assessment gathering a relevant health report to assist them to access temporary accommodation. As they arrived under the family scheme there were no LA pre-arrival checks on their accommodation, and no support regarding financial and integration needs.

Some migrants also experience differences due to their immigration status. Asylum seekers don't have the right to work and cannot access public funds, while asylum support rates are low in comparison to Universal Credit. The inability to work and reliance on asylum support may place them at a disadvantage should they obtain status as they may have been institutionalised into the support system and haven't had the opportunity to navigate UK systems. This is counter-productive to integration.

An example demonstrating differences experienced between routes is the fact Afghan scheme refugees were able to claim full Universal Credit upon arrival due to government amendments, despite being supported in hotels with full board accommodation by the Home Office and having no additional costs like food or utilities. This meant that some Afghan refugees

were able to save money towards supporting their transition to independent living. Other refugees like those from the asylum process do not benefit from this and this shows that there is inequality between routes.

The No Recourse to Public Fund (NRPF) condition poses a problem for many migrants with leave to remain like those on the family migration route as they cannot access the necessary support that can help avoid poverty. Migrants with NRPF can often find themselves experiencing destitution consequently, and in many cases local authority intervention is required under s.17 of the Children Act. Data gathered from 3 of the 15 councils in Yorkshire and Humber showed that they had supported 184 NRPF households costing £2.5m a year. This included 133 destitute families with children (NRPF Network: 2023). Whilst some like those on the Hong Kong route can apply to remove the condition from their leave in some cases, not all migrant groups experiencing destitution have a remedy to do this. This case study from the Hong Kong Welcome Programme highlights the benefits of

having funding and systems to support people with no recourse, enabling responses which can resolve destitution:

Z is has a Hong Kong BN(O) visa and is registered as blind. She approached the Hong Kong Welcome Programme as she was staying in an Air BnB but was facing homelessness with no income to secure further accommodation. Migration Yorkshire contacted Sheffield Council asking them to assess her needs under the Care Act and provide interim support to through DLUHC's Hong Kong destitution funding for local authorities. Sheffield provided accommodation and financial support to Z while the welcome programme assisted her to find an immigration adviser and apply to the Home Office to remove the NRPF condition from her leave. The condition was removed, and Z was able to claim welfare benefits including housing costs. The council were able to claim back the costs of support provided.

6. Have immigration policies influenced access to public services for migrant communities? If yes, please tick all the public services that, from your experience, migrant communities have difficulty accessing.

(Education, Healthcare (Physical, mental and Sexual), Housing, Social welfare (Universal Credit, working and child tax credits, job seekers allowance etc), Social support (Child protection, elderly care, disabled care, domestic violence etc), Financial Services (Banking), Other, None)

See q7.

7. In relation to the last question, please explain which policies affect those in migrant communities access to public services and how.

Our experience is that immigration policies can create barriers in accessing housing, welfare and social support.

The NRPF condition prevents migrants from accessing housing, welfare benefits and homelessness services by making them ineligible. However, we also find through our engagement work that many migrants with NRPF are unable to access social care support despite being eligible. This is due to a lack of understanding of duties, rights and entitlements from housing and social care teams. In some cases, where LA support is provided under statutory duties under the Care Act 2014 or Children Act 1989, the support provided is inadequate, failing to meet standards set by case-law. This is often due to a lack of training, but also a lack of funding, placing additional pressure on LA's. There are also discrepancies between migrant groups with the NRPF condition. Most migrants with NRPF are unable to lift the condition, leaving them economically unstable, however some like Hong Kong BN(O) visa holders can apply to remove the condition, and benefit from a government funded destitution support package available to LA's to assist them.

Assessing eligibility for public funds for EU migrants results in some EU nationals being wrongly denied access to benefits, housing, and homelessness assistance. Policies outlining rights and entitlements for this group are complex, and there is expectation on public services to understand and carry out the role of an immigration adviser in that they are expected to ascertain immigration status and make decisions on support entitlement. Our work with LA's around NRPF and EU Settlement Scheme has regularly found that EU nationals have difficulty accessing services where eligible, forcing them into poverty and destitution.

The prescribed 28 day move-on period from the Asylum Support Regulations 2000 does not provide newly granted refugees sufficient time to access housing advice and find permanent accommodation. Our Refugee Integration Service partners regularly see cases of service users housed in temporary

emergency accommodation at the end of the move-on period due to being unable to find secure accommodation. This is often due to delayed notice from the Home Office and accommodation providers over their pending discontinuation, or failure of the Home Office to issue necessary documentation such as Biometric Residence Permits, which enable a new refugee to evidence their entitlement to access services. Government policies to restrict access to banking under the Hostile Environment have resulted in a culture where banks are hesitant and lacking in confidence to work with and understand the status of newly granted refugees and their entitlement to banking services. Partners regularly feedback that new refugees are refused banking services due to banks not accepting or understanding documentary evidence. This places new refugees at risk of poverty as they are unable to receive payment for benefit or employment without a bank account.

Policy around support for care leavers who have been refused asylum also results in inconsistent support provided by LA's to

former ‘looked after’ unaccompanied asylum seeking children. The support provided by LA’s to care leavers is extremely limited compared to their ‘peers’ who have been granted status. They cannot access education or employment and may only be provided basic support such as shelter and food parcels or vouchers. This places young people at risk of exploitation and criminal activities such as illegal working arrangements. Further, some LA’s make the decision to end all support after three months (as Home Office funding ends). In these cases, young people are increasingly likely to go missing and/or experience destitution, exploitation, and may have no access to education or health services. In many examples, these young people are reliant on charities and communities for support.

8. Have current immigration policies impacted the ability of migrant communities to afford essentials such as food, heating and electricity? If yes, please tick all the essentials that, from your experience, migrant communities find challenging to afford.

(Water, Food, Electricity, Gas, Heating, Communication (Wifi, phone etc), Rent/mortgage, Public transport, Medication, Personal hygiene/toiletries, Childcare, Child related costs (baby products, children's clothes etc), Other, None)

See Q9

9. In relation to the last question, please explain which policies affect those in migrant communities ability to afford essentials and how.

The NRPF condition provides a good example which shows that some migrants are often unable to afford essentials such as

food, heating and utilities. Feedback from local authority partners at our regional NRPF Network meetings regularly reveals that councils find themselves intervening to support vulnerable families and adults. The NRPF condition bars access to some additional support options available such as emergency welfare assistance schemes, social funds and some of the energy fuel schemes that are available to help people with utilities.

Moreover, childcare costs are an additional hurdle for families with the NRPF condition due to the inability to access the 30 hours free childcare for those on a low income. This has been found to be a challenge for some of the families arriving in our region under the Hong Kong BN(O) route, who cannot access this additional support due to the condition. Despite being on a low income, we've had requests for assistance from families who do not meet the Home Office's threshold to remove the NRPF condition from their leave to remain as they are not considered to be 'at imminent risk of destitution', which would ultimately enable to them access this level of free childcare.

.

Whilst we recognise it's essential that a support system exists to prevent destitution, the asylum support system may place asylum seekers at a disadvantage should they go on to be granted refugee status. They may arguably have been institutionalised to some degree, not had experience paying bills, accessing social welfare systems etc. in the UK, and this is counterproductive to integration. A similar issue has been

encountered by Ukrainians on the Homes for Ukraine Scheme who, because of extensive long-term support from hosts, may not be undergoing the process of learning to navigate systems in the UK, paying bills, rent and managing other costs.

The low rates of asylum support can place additional pressures on families with small children who require additional funds for toiletries like nappies, wipes and other baby related costs. Whilst the asylum support system allows for additional support £3 and £5 per week for families with children under the age of 1 and 3 respectively, this is barely sufficient, and this has been highlighted in a recent High Court case (Maternity Action: 2023). We have had cases raised from voluntary sector partners through a case escalation system we coordinate with the Home Office and contracted providers. Moreover, this is even more relevant for those in full-board support who only receive £9.58 per week in cash. Other key child-related costs which asylum seekers regularly struggle with includes school uniforms and school shoes of which the support on offer from schools and local

authorities is found to be insufficient. If support rates were higher, families would be more able to manage a restricted budget.

10. Have current immigration policies contributed to migrant communities being unable to find adequate housing? Additionally, have current policies contributed to homelessness among migrant communities? If yes, please provide detail on the specific policies and the effect these policies have had.

We welcome the development of safe routes enabling refugees to come to the UK, but the lack of long-term planning around housing is apparent, notably for the Ukraine and Afghan schemes. While DLUHC extended funding for hosting placements under the Homes for Ukraine and Home Office (HO) brought in measures to support LAs to move refugees out of Afghan hotels, increased asylum decision-making meant LAs have had difficulty

finding permanent accommodation for these groups. Additionally, new housing regulations mean that individuals who have been in the UK less than two years can be placed indefinitely in temporary B&B type accommodation and can be offered out of area accommodation, placing refugees from asylum and Ukraine at a disadvantage as they can be offered less favourable and sustainable housing placements. This indicates that there needs to be better planning around housing and integration when developing routes for refugees.

The 28 day move-on period disadvantages newly granted refugees from the asylum process trying to secure accommodation and isn't in line with the Homelessness Reduction Act outlining that LAs must treat someone as at risk of homelessness within 56 days. This inconsistency was highlighted by the British Red Cross who said that extending the move-on period from 28 to 56 days could save homelessness services between £4-7million a year (British Red Cross: 2020). Due to bureaucracy, the earliest a LA becomes aware of a positive

cessation is 26 days - this is not enough time to secure long-term accommodation. Moreover, the HO's increased asylum decision-making and the change in operational approach to discontinuations has seen many refugees given only 7 days' notice to leave their property. The case study from our Refugee Integration Service (RIS) highlights this:

X was granted status on 24 July, receiving his BRP but no notice of his support termination. On 23 August notification was received via accommodation provider informing X to leave his accommodation by 1 September. Bradford Council assessed X but found no duty to accommodate him despite X having some medical issues. X was homeless for 2 weeks before the Council were able to source a bed in a hostel. X reported a deterioration in his mental and physical health with homelessness aggravating his health conditions, requiring further treatment. The delay in finding a bed was attributed to the HO's increase in decision-making creating pressure on homelessness services in Bradford.

Research undertaken by University of Huddersfield found that refugees from the asylum process are multiply disadvantaged

when accessing housing due to a lack of familiarity with housing and welfare systems resulting from having no right to work and access to public funds, living in asylum accommodation prior to being granted status and lack of English language support (Migration Yorkshire: 2022).

There are disparities in accommodation requirements and housing funding for different visa routes. Whilst arrivals under the Homes for Ukraine scheme benefit from being offered accommodation by sponsors, the Ukraine Family scheme has no accommodation requirement meaning that arrivals often present as homeless to the local authority as they don't have any or suitable accommodation that meets Housing Act standards. Similarly, refugee family reunion arrivals often present as homeless upon arrival due to the lack of a maintenance and accommodation requirement for this visa route (LAs working on RIS have requested that HO notifies them when a visa is granted so that they can advise and prepare sponsors in advance of arrival dates).

Funding to local authorities to provide move on support for Homes for Ukraine scheme is welcome but it doesn't follow people who move out of area and are not rematched with hosts, and is not available for other Ukrainians, meaning that some don't benefit from support assisting them to find long-term

accommodation.

11. Do current immigration policies affect those in migrant communities paid and unpaid employment opportunities? If yes, please provide detail on the specific policies and what effect these policies have.

We are aware from our engagement work under the EU Settlement Scheme that the implementation of digital status has seen some migrants experience difficulties accessing employment. This arises with issues with the generation of shared codes evidencing right to work to employers. Technical issues with digital status can impact the ability to access employment and therefore increase the risk of poverty, highlighting that the Home Office's system to evidence the right to work requires further improvement. This is of concern as the system has from

April 2023 been rolled out to other categories of leave.

Another policy affecting migrant access to paid and unpaid employment is the inability to access free ESOL provision and funding through the Adult Education Budget for asylum seekers and people with no recourse to public funds. Denying access to free ESOL provision within the first six months of arrival for asylum seekers delays the process of integration. The quicker people are supported to learn the language, the more able they will be to access employment when they obtain the right to work. The decision to deny these groups this support due to an immigration condition contributes to the production of inequality in the labour market. High rates of employment from some migrant groups like Ukraine Scheme arrivals who do benefit from such support may help illustrate that those with more generous support and access to services fare better (ONS: 2023).

12. What specific changes would you recommend for current immigration policies to mitigate the adverse effects of poverty amongst migrant communities? Additionally, what evidence can you provide to demonstrate that these policy changes could make a difference? (i.e. cost-benefit analysis, economic or social modelling etc?).

The government could look to introduce a range of changes to current immigration policy which could help minimise the risk of poverty being experienced amongst migrant communities. These measures could include but are not limited to:

- The disapplication of the NRPF condition. Where people are here in the UK and have leave to remain, they should be fully able to access services – this is important for integration and creates equality across communities. People should also be able to access the relevant support to enable them to work towards accessing employment, thus contributing to the economy. The absence of the NRPF condition would also save councils money as they would no longer be required to intervene and support destitute families with subsistence support where statutory duties are identified. Alternatively, government funding to local authorities to support people with NRPF would help produce better responses from local authorities.

- Increasing the move on period for newly granted refugees would provide a more stable transition period from asylum support to mainstream benefits and housing. If local authority housing teams had sufficient time to work with and support individuals to find accommodation such as from the private market, this could reduce the likelihood that new refugees find themselves placed in temporary emergency accommodation or in some cases become street homeless.

- Introducing some degree of parity across different schemes and routes and providing an equivalent package of integration support, rights and entitlements would minimise inequality between groups and ensure that each migrant group is offered similar opportunities to thrive in the UK. This is particularly relevant to refugees and ‘safe and legal routes’ where there are clear differences between the support provided to a refugee from the asylum system compared to a resettled refugee for example, or between schemes like Hong Kong and Ukraine. The UK Resettlement Scheme outlines a strong model showing the benefits of a holistic integration package for arrivals, supporting them with English language, employment access and family and

wellbeing needs. Better planning around housing and integration when developing routes to support refugees would also be beneficial.

- Enabling all asylum seekers and migrants with the NRPF condition to be able to access free ESOL provision would make a significant difference to speeding up the integration process, increasing employment opportunities, empowering refugees to be able to understand and navigate UK systems and manage finances better. In devolved nations such as Scotland, all refugees and asylum seekers can access free ESOL provision from the day of arrival, showing this approach is realistic. Research from University of Oxford has illustrated that refugees who came through the asylum system are less likely to be in employment and for those who are employed they are more likely to earn less money compared to other migrant groups (COMPAS: 2018). High levels of employment amongst arrivals on the Homes for Ukraine Scheme compared to other routes shows that with an extensive integration support package, new arrivals can be better placed to enter the labour market.

- Increasing asylum support rates to be in line with the standard rates for Universal Credit would ensure asylum seekers, especially those with children are able to meet every day needs such as around food, toiletries, and child related costs.

13. Is there any relevant research, articles or reports that you would like to draw the attention of the inquiry team to whilst they consider appropriate policy recommendations?

We work with a range of partners including local authorities and voluntary and community sector groups on a number of programmes supporting different cohorts such as asylum seekers, refugees from both asylum and resettlement programmes, unaccompanied asylum-seeking children, and other migrant groups like arrivals through the Ukraine Scheme and Hong Kong BN(O) visa route. For this inquiry we have drawn

upon evidence we have received from our work managing the Refugee Integration Service in Yorkshire and Humber and our SMP role to facilitate engagement around refugee resettlement, asylum, Hong Kong Welcome Programme and the Ukraine Scheme in Yorkshire and Humber.

We have drawn upon evidence from work as Strategic Migration Partnership (SMP) in Yorkshire and Humber, working with a range of partners including local authorities and voluntary and community sector groups on a number of programmes. This includes work supporting different migrant cohorts such as asylum seekers, refugees from both asylum and resettlement programmes, unaccompanied asylum-seeking children, and other migrant groups like arrivals through the Ukraine Scheme and Hong Kong BN(O) visa route. For this inquiry we have drawn upon evidence we have received from our work managing the Refugee Integration Service in Yorkshire and Humber and our SMP role to facilitate engagement around refugee resettlement, asylum, Hong Kong Welcome Programme and the Ukraine

Scheme in Yorkshire and Humber.

We have also drawn upon evidence from some of our policy and research work but also external research in the migration sector. The following reports are of relevance:

‘Homeward Bound: The Housing Transitions of Refugees’. Migration Yorkshire. 2022.

‘Locked into Poverty on Asylum Support’. Asylum Matters. 2020.

‘Home Office Must Pay Asylum Support to Pregnant Mothers Living in Asylum Accommodation’. Maternity Action. 2023.

‘Migration, Migrants and Child Poverty’. CPAG. 2018.

‘Not Seen, Not Heard’. Project 17’. 2019.

‘NRPF Connect Data Report 2021-2022’. NRPF Network. 2023.

‘Refugees and the Labour Market’. COMPAS. 2018.

‘Still an Ordeal’. British Red Cross. 2018.

‘The Cost of Destitution’. British Red Cross. 2020

‘Visa holders entering the UK under the Ukraine Humanitarian Schemes, Outcomes Survey: 27 February to 13 March 2023’. ONS. 2023.

14. Would you be willing to attend an oral evidence session in Parliament at the end of November to provide further evidence if required?

Yes.

Source URL:
https://www.migrationyorkshire.org.uk/policy/consultations/effects-uk-immigration-asylum-and-refugee-policy-poverty-joint-inquiry-appg-migration-and-appg-and