MY Response – Consultation on Reforms to Social Housing Allocation

Summary

1. Migration Yorkshire provides strategic leadership and local support across the Yorkshire and Humber region. We work with national, regional and local partners to ensure that the region can deal with, and benefit from, migration. Our role includes the Strategic Migration Partnership function for the Yorkshire and Humber region.

2. We welcome the opportunity to respond to this call for evidence. This response was informed by our experience of strategic coordination work including our asylum enabling and resettlement coordination work as a Strategic Migration Partnership and our role in managing the Refugee Integration Service in Yorkshire and Humber. The Refugee Integration Service was a multi-partner regional refugee integration programme which operated from January 2019 to December 2023, providing local authority-led refugee move-on support. We've also drawn upon findings from our policy and research

work on migration and integration. Our response to the call for evidence is summarised as follows.

3. We would like to highlight that access to housing is already a major challenge for new migrants including new refugees settling in the region, any provisions that would create additional hurdles to accessing housing would have a negative impact on integration, stability, and wellbeing.

4. We chose only to respond to questions in the call for evidence that we feel able to. These include questions **2**, **3**, **9**, **10**, **11**, **12**, **39**.

Question 2 Do you agree that an individual should have to demonstrate a connection to the UK for ten years before qualifying for social housing (if they do not meet the test otherwise or are exempt)? Yes. No. Don't know. If no, please detail length of test.

5. No, having such a long residency requirement to establish a local connection would unfairly disadvantage migrants from being able to access social housing. It could create further divisions in society where migrants have fewer entitlements, and this would be counterproductive to integration. We believe that

all migrants who have leave to remain should be given the tools necessary to be able to thrive in the UK, and this includes access to housing.

6. Concerns were raised by one local authority partner that such a proposal would be unworkable and costly for local authorities who must then staff the process of assessing documentation, essentially taking on an immigration enforcement role in order to ascertain whether someone meets the eligibility criteria for social housing. Staff would also need to be trained to carry out this role.

7. Furthermore, local authority partners have suggested that the proposal would be costly as many people would be deemed ineligible for social housing but at risk of street homelessness. Local authorities would inevitably be required to intervene with the provision of temporary accommodation in these cases. This is potentially unsustainable, as the government's proposal assumes that accommodation is available in the private rental market. Many local authority areas lack sufficient suitable private rented accommodation to meet current needs. Meanwhile, amendments to the homelessness suitability regulations, could technically result in more migrants, including newly granted refugees being housed out of area. This could create disparities

in experiences and opportunities between refugee groups, where some, such as those arriving on ‘safe and legal’ routes, are exempt from barriers to accessing accommodation, whilst others such as those granted refugee status through the asylum route, are not.

Question 3. Do you think there should be any further exemptions to the UK connection test, for example care leavers? Yes. No. Please explain your answer

8. Yes, we believe care leavers should be exempt from the UK connection test. Vulnerable young people such as former unaccompanied asylum-seeking children, are dependent on the support they receive from their Leaving Care team locally and have often built links and networks, including with previous foster carers, college, their places of work or worship and so on. This group already faces challenges rebuilding their lives in the UK, maintaining connection with the area where they have been Looked After is essential for wellbeing and long-term integration.

9. We believe that all newly granted refugees from the asylum system should be exempt from any UK connection test. This group is already extremely vulnerable and may need additional support to access services, avoid destitution as well as with long-term integration. They are currently exempt from habitual residence testing for the purposes of accessing welfare benefits which demonstrates government recognition of the particular circumstances of this group. While being a refugee does not necessarily mean that someone meets the eligibility criteria for social housing, the avoidance of unnecessary barriers would help ensure many vulnerable refugees who have been granted leave to remain in the UK through the asylum route are able to access suitable accommodation. Local authorities in our region have asked for reassurance that this group would be exempt.

10. Through our work with local authorities on asylum engagement, we are aware that newly arrived and newly granted refugees encounter a lack of available private rented accommodation. Limited experience of navigating the market, less fluency speaking English, along with an absence of support available, can mean refugees experience significant disadvantage. Many new refugees find themselves pressured to

accept poor living conditions, entering into exploitative and/or sub-standard private rental arrangements. This is further exacerbated by the risk of destitution as newly granted refugees have just 28 days to find suitable accommodation when moving-on from asylum support. The Refugee Integration Service provided housing advice and support to almost every service user. Now, beyond limited telephone-based support via the asylum AIRE contract, there is no robust refugee move-on service funded by central government to ensure new refugees are able to access suitable housing.

11. More access to social housing would help ensure some in this group are safeguarded from exploitation. Additionally, the removal of inconsistencies between the rights and entitlements of refugees granted status through the asylum process and those arriving on 'safe and legal routes' would avoid a problematic dichotomy between 'deserving' and 'underserving' refugees. Some local authority partners in our region have expressed unwillingness to deliver unequal levels of service and support based on a person's route of arrival. They believe it could reinforce community tensions, legitimising the idea that some groups are less welcome. Some local authority partners

expressed that they felt this could be discriminatory.

12. Individuals and families who arrive through relocation and resettlement routes should also be exempt as social housing provides sustainable, affordable long term housing solutions in all parts of the UK for families of different sizes. We welcome the proposal to exempt this group from the UK connection test.

13. A further important exemption is people who arrive on refugee family reunion visas. Local authorities in our region often have families present to Housing Services in urgent need of assistance. In many cases families with young children are joining a single adult who lives in bedsit-type accommodation and therefore need affordable, suitable housing.

Question 9. Do you agree that an individual should have to demonstrate a local connection with an area for two years before qualifying for social housing (unless exempt)? Yes. No . Don't know. If no, please specify the length of test.

14. No, any policy barring access to social housing based on a long local connection test would mean that many new migrants could find that they are unable to access housing. This could include families and individuals on a variety of routes and programmes such as under the family migration route.

15. Currently, for a new refugee granted through the asylum process, a local connection is automatically established to the area where they were residing in Home Office accommodation at the time of grant. We believe this should continue as it provides an important safeguard for refugees and reduces the drift to big cities such as London, where people may be more likely to face street homelessness.

Question 10. The government intends to use the definition of local connection in section 199 of the Housing Act 1996. This definition would mean that a person has a local connection: because they are, or in the past were, normally resident there, and that residence is or was of their own choice; because they are employed there; because of family associations; or because of special circumstances. Do you agree that definition should be used? Yes. No, residency only. No, other (please

specify). Don't know. If other, please explain your preference.

16. Due to the multifaceted nature of 'connections' for many refugees, such as having friends, family, established communities, or employment spread across towns within region, a recent paper by the University of Huddersfield with Migration Yorkshire proposed that a 'regional local connection' model could be beneficial for both local authorities and refugees. This would ensure that responsibilities to support with access to housing could be spread across local authorities, providing more equity, meanwhile taking into consideration the complex nature of 'home' and 'connection' in the lived experience of refugees. (University of Huddersfield: 2022)

Question 11. The government proposes to exempt care leavers from the local connection test for social housing up to the age of 25 to align with broader Corporate Parenting Principles, which sets out the responsibilities of local authorities towards children and young people in care. Do you agree? Yes. No.

17. Yes, as with our response to the UK connection test, through our work supporting local authorities to work with young refugees and asylum seekers, we are aware of the additional vulnerabilities and long-term challenges this group can face, especially upon leaving care. We would support an exemption to the local connection test so that care leavers such as former unaccompanied asylum-seeking children are able to access suitable local housing and therefore able to focus on other integration needs such as education and employment.

Question 12. Do you think there should be any further exemptions to the local connection test? Yes. No. If yes, please propose additional groups.

18. Yes, we believe that all migrants with leave to remain should have the tools to be able to build lives in the UK and this should include access to all public services and benefits including access to social housing. The availability of private rented accommodation is already a major challenge in most local authority areas in our region. Excessive dependence on the

private sector risks pushing people towards low quality housing and exploitative tenancy agreements.

Question 39. Do you expect that any of the policies impacting new social housing applicants would have a particular impact on those with a particular protected characteristic? Yes. No, Don't know. If so, please give further detail on the relevant policy and its impact.

19. Yes, the UK connection test proposal would apply to people who have been here less than ten years and so this means that it will affect migrants. It is therefore likely that groups with protected characteristics including 'race' and 'religion' would be overrepresented and significantly disadvantaged.

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