

# Response to the Commission on the Integration for Refugees

## PART 2 - REFUGEE AND ASYLUM SYSTEM [Maximum 250 words]

**How can we improve the overall refugee and asylum system to support the protection and integration of refugees and those granted other forms of humanitarian protection, and what special measures are needed for unaccompanied asylum seeker children (UASC)?**

1. The refugee and asylum system could be improved through:
  - Faster and time-led targeted decision-making for asylum claims, limiting delays in obtaining status.
  - Expanding the asylum contracts to develop an integration support package akin to that available for resettled refugees. This could include more funding for local authorities to coordinate local support for arrivals.
  - Parity across all refugee routes with integration support, waiting times, status grants, settlement routes, rights and conditions equal for all refugees regardless of which programme they arrive through.
  - Expanding safe routes by increasing resettlement commitments and providing refugee family reunion rights to all refugees. The reintroduction of a system enabling children in Europe to be reunited with family in the UK would also be beneficial to ensuring the safety and best interests of children.
  - Additional funding for local authorities to support young people in care would be welcome. All children in this country, irrespective of where they were born, have the right to a safe and nurturing environment. Safeguarding would be improved by guaranteeing local authority and Ofsted regulation of all hotels housing young people, ensuring that all children are protected by the Children Act 1989.

- A reconsideration of the two-tier refugee system or 'differential treatment' provisions from the Nationality and Borders Act which disadvantage refugees by limiting access to integration and protection due to some groups experiencing longer routes to settlement and an absence of family reunion rights.

**How should these systems ensure the humane treatment of those asylum seekers who do not receive status?**

2. We believe that everyone who lives in the UK should have opportunities for integration. Providing access to public funds and temporary status to refused asylum seekers would be better for individuals, and for society by providing longer-term savings, reducing pressures on services, encouraging contribution and building cohesive communities.

### **PART 3 - LOCAL INTEGRATION SUPPORT [Maximum 250 words]**

**How could the central government, devolved governments, local government and the voluntary sector better coordinate their work to tackle the challenges of supporting refugee integration across the UK?**

3. A well-resourced single national policy framework for refugee integration from day one (across all groups including asylum), co-designed with expert stakeholders and those with lived experience would help tackle the challenges of supporting refugee integration.

**What difficulties do asylum seekers and refugees face in accessing services (including but not limited to housing, education, training, healthcare, children's services and social services)?**

4. Please see additional information.

**What challenges do organisations (in the public, private and third sector) face in providing services for refugees and asylum seekers (including but not limited to housing, education, training, healthcare, children's services and social services)?**

5. The current landscape of bespoke integration packages is complex for local government to coordinate. This can result in unclaimed funding, falsely indicating a lack of need. Inaccurate interpretations of complex eligibility criteria can also result in individuals being denied provision.

The intricacies of the ESOL landscape demonstrates this. A refugee resettled under UKRS can access mainstream ESOL from day of arrival and LA tariff to fund bespoke provision, whilst an asylum seeker must wait 6 months before joining a waiting list for AEB funded ESOL. Conversely, a HK BNO visa holder has to wait 3 years before they are eligible for AEB, but LAs can access tariff funding.

We suggest funded ESOL access from day of arrival across all refugee and asylum cohorts.

6. The short-term nature of integration funding streams can result in time-limited projects, short-term contracts, and poor staff retention. Longer-term funding would allow the VCS to build organisational capacity to respond in an agile way to emerging refugee need.
7. Barriers faced by refugees in accessing appropriate housing, and by LAs in sourcing properties, are exacerbated by the national housing shortage. We would welcome additional funding streams for all LAs to improve access to housing for refugees, and new place-based holistic housing initiatives to increase housing stock for all cohorts.

**What actions are needed to overcome the challenges faced by refugees, asylum seekers and service providers?**

#### **PART 4 – PUBLIC OPINION AND POLITICS [Maximum 250 words]**

**How does the way that politicians, the media and the general public talk about refugees and asylum seekers affect refugees' ability to integrate into British society?**

8. Whilst refugees are agents in their own integration, communities also have responsibility to facilitate a welcoming environment which allows refugees to thrive. Where leaders and the media are constructive in their response to refugees it can galvanise communities into positive action (as seen by the housing offers for Ukrainian arrivals). However, the politicisation of refugee policy is not always conducive to the multidirectional process of refugee integration.
9. Protests regarding asylum hotels are increasing in frequency while asylum seekers and refugees are regularly targeted in 'migrant hunter' videos appearing on social media. Local authorities feedback that refugees are left distressed by superfluous claims around criminality, motivations around arrival, or their financial circumstances.
10. There is concern that UASC are increasingly being discussed as an immigration issue, rather than as vulnerable looked-after children. Negative framing is unlikely to encourage the foster placements needed for children. The longer-term impacts of negative narratives on children the system is designed to safeguard remain unknown and will only be understood in time.

***Q2. Our preliminary findings have shown that integration policy has rarely been a political priority of the UK government. What can be done to put integration at the heart of government policy on refugees and asylum seekers?***

The government could:

- Develop a single, evidence-based national policy framework for refugee integration.
- Progress the ESOL strategy to give the sector strategic direction (a commitment made in the Integrated Communities Strategy).

- Build opportunity for those with lived experience to feed into national policy design, including through formation of a national Refugee Advisory Group of experts by experience.
- Create a Minister for Integration, and potentially a separate Department for Integration which could include overseeing provision for all people arriving through protection routes. The separation from the current departmental and ministerial structure would enable a focus on refugee integration rather than immigration control, improving outcomes for both refugees and host communities.

### **PART 5 - Additional Information (1000 words)**

11. Migration Yorkshire provides strategic leadership and local support across Yorkshire and Humber, carrying out the Strategic Migration Partnership (SMP) function in the region. We work with stakeholders across the statutory, voluntary, community and private sectors to ensure the region can benefit from migration.
12. Migration Yorkshire's activities and resources help promote constructive and informed discussions about the reality of life for refugees in the UK. Examples include our comprehensive regional training programme to inform people of migration policy and processes, and outputs of our collaborative research projects including the recent release of Transitions, a graphic novel produced by the University of Huddersfield as part of the Refugee Integration Yorkshire and Humber project.
13. We welcome the opportunity to respond to this call for evidence from the Commission for the Integration of Refugees and are keen to contribute to any discussion that can enrich the development of policy and practice to support refugee integration. Our response is informed by our strategic coordination work supporting asylum dispersal, Ukraine Scheme, Hong Kong Welcome Programme, refugee resettlement and National Transfer Scheme. We've also gathered learning from two regional refugee integration projects in Yorkshire & Humber that we manage, the Refugee Integration Service and Connecting Opportunities. We've outline below some more detail from our response to the call for evidence.
14. We have numerous recommendations that government could make to improve the lives of refugees in the UK and their opportunities for integration, thus providing a more equitable experience for all refugees. These include but are not limited to the following:

15. Measures to ensure that there are more safe routes available for all refugees to come to the UK, minimising the need for individuals to make dangerous journeys. However, we are cautious about the creation of new bespoke routes for particular groups or nationalities as this could create inequalities between groups of refugees and an overcomplicated landscape of funding instructions for local authorities.
16. The government should consider expanding existing 'safe and legal routes' to all groups and nationalities such as by increasing resettlement opportunities globally and expanding refugee family routes more broadly to all refugee groups. This could include removing restrictions to 'Group 2 refugees' or to resettled Afghans, enabling the sponsorship of more dependent family members and allowing child refugees to become sponsors.
17. There is a need for a review of 'safe and legal routes' as well as a review of the asylum support system and how this compares with support in place for other schemes. The government could consider aligning the different routes to reduce inequality between schemes.
18. There is a notable lack of integration support available to asylum seekers through the asylum contracts. We'd encourage parity across all schemes so that refugees arriving as asylum seekers, on a resettlement programme or another 'safe and legal route' are provided with a similar package of integration support, rights and entitlements and conditions in the UK. This would mean that all refugees are given the same tools to rebuild their lives and thrive in the UK, and hopefully with similar outcomes in education and employment.
19. Central government must consider how better to coordinate multiple different funding programmes with differing instructions for local authorities responding to different schemes. Consideration of a merging of all refugee integration programmes would be beneficial.
20. Greater efforts to improve responses to unaccompanied asylum-seeking children through both policy and operation. This could include ensuring a recognition that children are children first and not primarily treated as an immigration issue. Substantial efforts must be undertaken encourage and recruit foster carers for unaccompanied asylum-seeking children as well as making available greater funding for local authority children's social care services.
21. Some provisions in the Nationality and Borders Act 2022 should be reviewed due to the likelihood they may have negative impact on integration. This includes the provision of a 10-year route to settlement for those granted temporary permission to stay, limited family reunion rights and potentially no access to public funds. This all seems counter-productive to creating an environment that enables opportunities and develops individuals and communities. There are particular concerns about how these provisions apply to unaccompanied children and whether they should always be given the benefit of doubt and

are able to show good cause for unlawful entry rather than suffer long-term consequences which impact their access to protection and rights and entitlements.

22. Access to learning English is a priority for all migrants including refugees and the removal of barriers to ESOL provision such as through providing more funding and universal eligibility to ensure all refugees are able to begin learning as soon as they arrive in the UK.
  
23. Further to these proposals to improve the asylum and immigration systems to become more efficient, streamlined and ensure better structures are in place to respond to refugee migration, we'd also support the development of a UK-wide government-led long-term refugee integration strategy to enable government to fully identify gaps and develop policies that address the holistic nature of refugee integration. This would ensure clear objectives and actions can be implemented to improve outcomes for new refugees. Our regional refugee integration strategy, *Making Connections, Building Resilience* has enabled our region to look at cross-sectoral priorities in supporting refugee integration as well as explore a range of topics like the role of employers, social connections and isolation in communities, which could be explored at a national policy level. Further, we'd welcome efforts to fully map impacts across different sectors and services and commit targeted funding and workstreams to support in areas like health and education with a view to improving not only the lives of refugees but also how well-prepared public services and local communities are to respond to migration.
  
24. This response was prepared by Stefan Robert and Annie Lancashire in March 2023. For further information, contact us at [admin@migrationyorkshire.org.uk](mailto:admin@migrationyorkshire.org.uk)

Links

<https://pure.hud.ac.uk/en/publications/transitions-a-story-of-refugee-lives>

<https://www.migrationyorkshire.org.uk/news/making-connections-building-resilience#:~:text=We%27re%20launching%20a%20brand,seekers%20living%20in%20the%20region>

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