

# refugee council

## policy response



## Refugee Council response to "A New Model for National Integration Services in England: Consultation Paper"

December 2006



## About the Refugee Council

The Refugee Council is the largest organisation in the UK working with asylum seekers and refugees. We not only give help and support to asylum seekers and refugees, but also work with them to ensure their needs and concerns are addressed by decision-makers.

## Introduction

As the leading organisation in the refugee sector in the UK, the Refugee Council welcomes the opportunity to have an input into the development of a new model for National Integration Services in England. The Refugee Council has unrivalled experience and expertise in working with individual asylum seekers and refugees, and with refugee communities, and we have drawn on this background in framing our response to the consultation paper. Our response complements that of the Inter-Agency Partnership, in which we play a leading role, and has been drawn up after consultation with numerous other agencies and groups with whom we work in partnership.

This document has been constructed in such a way that answers are given to all of the thirteen questions posed in the "Summary of Questions" section on page 14 of the consultation paper. However, we believe this can best be achieved by structuring our response document in the following way. In each section, the number in square brackets indicates how the point relates to the thirteen questions.

### 1. The proposed service specification

- Sunrise
- Mentoring
- Refugee Community Organisation (RCO) involvement
- Refugee Employment

### 2. The service fit with other services

- Immigration & Nationality Directorate (IND)
- One Stop Service (OSS)
- Wider integration work
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### 3. Possible contractual arrangements

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### 4. Contract compliance

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# 1. The proposed service specification

## 1.1 Sunrise

We support the idea that the Sunrise model should be the mainstay of the proposed new integration service. However, given the complex needs of a very varied client group we believe the casework delivered through Sunrise should be as flexible and responsive to the clients as possible. A “one size fits all” approach will not deliver successful refugee integration. Above all, we urge the Home Office to adapt the national Sunrise model to take into consideration the findings of the detailed evaluation of the four Sunrise pilots. [2]

- Clients with high needs will sometimes require more than 20 hours of casework support, other clients will require less. Case workers should carry out a needs assessment and have some flexibility to decide on the amount of case work an individual client requires. [2]
- The Personal Integration Plan, while welcome, can be too rigid and overly specified. The onus at the needs assessment stage should be on clients assessing their own needs, with the caseworker having the flexibility to adapt the PIP according to individual circumstances. The PIP should be subject to reappraisal at the six month stage to reflect changing circumstances – including the possibility that clients may relocate. [2]
- The PIP model is very much based on the individual. Family needs, and in particular, the critical importance of family reunion in helping personal integration, needs to be built into the model. The specific needs of women, including single women and those with particular child care issues, also need to be addressed. [2]
- The intensive case work provided by Sunrise works best when the providers are delivering it as a “holistic” service that clearly links with other asylum and refugee services, such as OSS and RCO advice services. [2 & 4]
- The aim of the service should be to deliver meaningful assistance that genuinely helps an individual client to integrate. This will be achieved in many different ways and the focus should be on outcomes which can be achieved through different service models, which could be more cost effective. Too much focus on inputs, outputs, targets and centrally devised objectives will not address individual integration needs. [2 & 13]
- The success of Sunrise is largely dependent on case workers being able to help their clients to access mainstream services. To this end, statutory agencies dealing with benefits, housing, training, schooling and employment need to work closely with the Sunrise service. [2 & 6]
- Volunteers (including refugee volunteers), working alongside Sunrise staff, will play an important role in the new integration service. Volunteering support will need to be properly resourced, but volunteers can deliver a wider range of outcomes to meet individual needs in a very cost effective way. [2]

## 1.2 Mentoring

We believe that mentoring does have an important role to play in helping some refugees to integrate. However, the service needs to be flexible enough to adapt to individual circumstances and to empower clients to achieve their own integration goals. [2]

- Not all newly recognised refugees will want to go through a formal mentoring process. The consultation paper underestimates the resourcefulness of refugees and the extent of their own contacts and indeed friends in the wider community. Mentoring needs may be quite specific. For instance, a refugee may not need “befriending”, but will welcome employment mentoring (such as that provided by schemes run by the Refugee Council in partnership with KPMG and Goldman Sachs). [2 & 3]

- Refugees, particularly those with high needs, welcome mentors who are active advocates and who are able to provide additional support to case workers in helping them to access services. [2]
- No single mentoring model is going to meet the needs of refugees. Often the best models are developed by agencies with specific areas of expertise or particular local knowledge. An overly formulaic approach to mentoring does not work well. [2, 8 & 9]
- Our experience suggests that mentoring is, if anything, welcomed more by long settled refugees (for example 3-5 years) than those who are newly recognised, as the latter often are still struggling with more immediate concerns. [2]

### 1.3 RCO involvement

RCOs play an important part in helping individual refugees to integrate and in helping refugee communities to play their full part in wider community life. Providing help with organisational development is important, but there also needs to be on-going support to the communities, to develop both “bonds” in the refugee communities and “bridges” with the host community and mainstream services.

- A consultancy model in which a service provider gives one-off, “in/out” organisational advice for a couple of days has its place, but our experience suggests that if the RCO sector is to grow and mature it needs on-going support from organisations with experience of working in this specialist field. [2]
- The service should reflect recent research which shows that flexible, sustained one-to-one support is most effective. The service should support the development and dissemination of toolkits and other resources for RCOs, such as QASRO and “Doing it for Ourselves”. [2 & 5]
- Recent research, including the Strategy for Mainstreaming Diversity in Changeup, suggests that the advice/consultancy service should not be limited to organisational development but should include community development which emphasizes the empowerment of individuals to achieve positive change through collective action. [2]
- As the Home Office knows, the Refugee Council is working with Refugee Action on a major new RCO infrastructure project in England, likely to be funded by BLF. The Refugee Council would be pleased to discuss how this new “BASIS” project should work in conjunction with the government-funded services. [2 & 4]
- We believe that a mechanism needs to be maintained within the new service to deliver funds directly to smaller organisations, in particular those that are refugee led. A small grants programme managed to agreed specifications by the contractor would support innovative and imaginative integration projects at a local level, which could include mechanisms for sharing good practice. Also, it is important that smaller groups do not feel excluded from Home Office funding streams for integration work. [2 & 5]
- The service model should also allow the provider to develop strategic initiatives to complement and enhance the basic service.

### 1.4 Refugee Employment

We believe that entry into employment at the appropriate level is one of the most important ways in which refugees integrate. We therefore welcome the fact that this aim is identified as a key element of the new service model. However, we believe that the service as set out in the consultation paper is too narrowly drawn. [2 & 3]

- While specialist employment advice to refugee professionals is important, we believe that the new service should deliver employment advice to all refugees, whatever their background,

skills and educational attainment. [3]

- For some refugees a move into employment is going to be more of a long term goal. We would like to see this element of the service also helping newly recognised refugees to take up training, volunteering opportunities and work placements, as a step towards full employment. [2 & 3]
- We believe it is important that the specification for the employment service does not focus exclusively on short term targets. The aim should be to find appropriate employment for refugees which will fulfil their long term potential and not to go for “quick wins”. To this end, the service should be providing careers advice and help towards employment as well as finding immediate jobs. [3 & 13]
- The Refugee Council has just completed a DTI funded project called Refugees into Business. This and other evidence has shown the need for support for refugee entrepreneurs who want to set up small personal businesses, social enterprises or community projects. Our partners believe self-employment should be supported as a valid outcome and employment advice should build on the web-based toolkits developed by the project. [3]
- The service must be more than just a referral or signposting service. As well as working closely with Job Centres, the service should be able to link (and in some cases sub-contract) to the established specialist and employment initiatives in this field, many of which have a good track record. [3 & 9]
- We believe the employment service and Sunrise could be delivered side by side as employment is clearly going to be an important part of the Personal Integration Plan. If this is not how the contracting works out, the employment provider and the Sunrise provider in every area will need to work very closely together. Similar links need to be made between employment advice and mentoring. [3, 5 & 9]
- We welcome the stress put in the consultation paper on the importance to integration of the English language. With this in mind, we feel that the recent limitations put on access to free ESOL for asylum seekers by the Learning and Skills Council represent a retrogressive step. We believe all asylum seekers and refugees should have access to free ESOL. Refugees newly granted status will need priority access to scarce ESOL places if the proposed integration strategy is to be effective. [3 & 6]

## **2..The service fit with other services**

### **2.1 IND**

We agree that it is essential that the client’s experience of moving out of the NAM into the new Refugee Integration services should be as seamless as possible. However, we also believe that newly recognised refugees are more likely to have confidence in the integration services if they are seen to be independent of NAM and IND. [1 & 8]

- We have long argued that the integration of refugees should start on Day One of the asylum claim and not wait until they get a positive decision. To this end, we believe that NAM case workers should be considering integration needs as a key part of their role. [1]
- When status is granted all relevant material in the NAM caseworker’s case file should be handed over to the Sunrise case worker. Thereafter, the Sunrise caseworker should be able to contact the NAM caseworker about any relevant issue in the case file. [1]

### **2.2 OSS**

We strongly agree that there are clear synergies and other benefits to be gained from a close fit between the new integration services and existing OSS operations. Many clients, who got

help from OSS during the asylum process, come back for “move on” or other advice once they have got status. OSS providers give this advice even though they are not funded to do so. In addition, OSS have developed strong links with voluntary and statutory agencies in their areas. [5 & 9]

- If integration services are delivered by OSS providers, clients will be familiar with the set up and will have confidence in people who helped them successfully through the asylum process. [5 & 9]
- We agree that on-going advice beyond provided by Sunrise should be available to refugees and that this would best be provided through OSS. [5 & 9]
- We believe the best way to ensure that tendering and procurement for the integration services achieves the object of building on existing services and maintaining good practice is to include in the specifications a requirement that bidding organisations have a demonstrable record of delivering high quality services to asylum seekers and refugees. [5 & 9]

### **2.3 Wider integration work**

We agree that the integration of refugees into UK society should go hand in hand with the government’s overall integration strategy. However, refugees do have particular needs that stem from the circumstances of their flight and arrival in the UK. It is likely that in many cases that they will need more help than migrants who have chosen to come to the UK for economic reasons. [5 & 6]

- The service provider needs to be an organisation which can demonstrate that it has good links with other integration initiatives and that its delivery of services will dovetail with integration work with other migrant and minority groups. [6 & 9]
- An objective of the new service should be to ensure that the needs of refugees are built into strategies for race equality, community cohesion and social inclusion. [6]
- We welcome the Home Office’s continuing support for Refugee Week and think that it is important that this sort of “positive image” work should take place alongside, but not as part of, the basic integration service. [5 & 6]

### **2.4 Other refugee integration projects**

We agree that it is important that the new integration services enhance and do not replace existing integration initiatives that are funded from alternative sources. In particular, it is important that innovative and imaginative local and refugee community led activities are helped to flourish alongside the standard set of services.

- The specification for the new services needs to take account of existing services so that it is filling the gaps and adding value to work that is already being done on refugee integration. In particular, the new services should be focussed on doing “core” work that other funders view as clearly the government’s responsibility. [4 & 5]
- Many of the integration needs of refugees, particularly after the initial period, are not going to be met, nor should they be, by the new services the Home Office are proposing. It is important, therefore, that other statutory bodies have a clear idea of their on-going responsibilities in this area. [5 & 6]

## **3. Possible contractual arrangements**

We can see advantages and disadvantages in the contracting models set out in the consultation paper. These are set out below. [8]

### **3.1 Single service supplier**

We agree that such an arrangement could provide the most consistent service across the country. But, in effect, all such a move would involve is one agency taking over the role currently played by the Home Office. [8]

- In reality, other agencies would almost certainly be involved at the contract delivery level because in most regions there are existing infrastructures and providers which are best placed to meet local needs. [5 & 8]
- The role of the single service provider would be in fact that of prime contractor responsible for managing a plethora of regional contracts and sub-contracting arrangements below those. [8]
- Any agency taking on a single contract would be taking on a lot of risk and the contract would have to reflect the additional costs. [8 & 11]
- The Home Office should consider other ways in which the strands/services could be linked, providing a more integrated experience for the client, for example through a personal integration plan covering all the services.

### **3.2 National contracts for each service**

We can see some benefits in this arrangement, but would want to see the obvious synergies between the services maintained. We can see the advantage in terms of getting new organisations into the market, but this is a specialised area and agencies not used to working with existing stakeholders would find it difficult to deliver effectively on their contracts. There would be some benefits for national providers or partnerships, with regional coverage across the country, being able to bid against a national specification including a requirement for local needs to be addressed (a parallel example being the One Stop Services for Asylum Support). [8 & 9]

### **3.3 Regional Contract**

We agree there is an advantage in contracting on this basis as it would dovetail with existing regional arrangements. It would also offer the opportunity for a number of agencies to take the lead in areas where they are already established players and already have relationships with potential sub-contractors at a local level. [8]

- This arrangement would also mean that services to refugees could be wrapped around existing OSS with the benefits set out in 2.2. [5 & 8]
- A potential disadvantage is that the integration service could vary considerably from region to region. [8]
- We would argue that agencies leading on regional contracts should also have to be national players or clearly meet nationally set specifications so that some level of national consistency was achieved. [8 & 9]
- We cannot see many advantages in awarding contracts on a regional basis based on IND regions as opposed to government regions. [8]

### **3.4 Location of services**

We recognise that locating services so that they are in the right place for newly recognised refugees is one of the biggest challenges facing the Home Office. There needs to be a certain amount of even geographical spread so that no one refugee is too far from the services, but on the other hand, refugees are likely to congregate in regional clusters. [7]

- We understand that there is a lack of information about exactly where refugees go on being

granted status and therefore feel Annex A may not fully represent the geographical distribution of newly recognised refugees. We would also advise that a longer time scale – 3 years rather than one - be used for scoping the distribution. [7]

- It is important to take into account new initial accommodation centres. It is likely that under the NAM significant numbers of asylum seekers will get a positive decision while in initial accommodation so the geographical distribution of newly recognised refugees may reflect that. [7]
- We recognise the need for the national integration service to be provided in all areas of England, even those where there are very few newly recognised refugees, so that clients are not forced to travel large distances for integration advice. But a full range of services doesn't need to be provided in all areas – some of the services could be provided in regional “hubs”, with basic Sunrise advice available in more locations through outreach and sub-contracting to small local partners. [5 & 7]
- We would suggest that the Home Office do more consultation with local providers over its criteria for locations of services to ensure that they are properly placed. However, we would counsel that some local groups, with loud voices, will lobby hard and that it is important to put the services where the clients are, not where the providers want them to be. [7]

### **3.5 Possible contractors**

We agree that the tendering process for the contracts for refugee integration services should not specifically exclude any type of organisation. New players in the field could be advantage as they bring with them fresh ideas. However (as stated in 3.2) we do believe this is a very specialist field and that when deciding between agencies factors such as a track record of, and a commitment to, working with refugees and asylum seekers should be given considerable weight. [9 & 13]

- It is important that the specification and procurement process is weighted in such a way that a proven track record of working on refugee integration counts in an organisations' favour. Organisations should be ones that refugees have confidence in and will readily access. [9]
- While value for money should be a factor, so should “added value” – for example, being able to demonstrate that in delivering the Home Office funded integration service an agency was enhanced by the other work it did with refugees in the UK, including the use of volunteers. Ideally, an organisation should be able to provide a “holistic” service to clients. [5 & 9]
- An organisation must have a track record of delivering work that is sustainable and of high quality. The organisation must also have the capacity to respond to changes in demand and type of service. [5 & 9]
- We do not believe smaller local players should be excluded from the process, but clearly any organisation bidding for main contracts would need credible, robust, experienced and have a track record of delivery of government contracts. Such requirements will also help to ensure that sub-contracting arrangements at a local level do not become too complicated. [5 & 9]
- It should be a requirement of any contract that the service provider works to build capacity in the refugee community sector so building over time the ability of refugee led organisations to deliver refugee integration work themselves. [9]
- We believe that any service provider should not be allowed to take any profit out of the sector. [9]
- We would like to see a full cost recovery funding framework applied to contracts. [9 & 13]

### **3.6 Contract Structure**

Broadly speaking, we agree that the proposals are workable. But it will be important that the

performance management of providers is of a high quality and service providers are held accountable. Transparency in all contracting arrangements is essential. [10]

- It is important that reporting arrangements are not over onerous and are compatible with the Voluntary Sector compact. It is very likely that a large number of small agencies will be sub-contracted to deliver elements of the service at the local level and if reporting arrangements are too complex the situation will be extremely difficult for both the lead contractor and the Home Office to manage. [10 & 12]
- If the Home Office is devolving contracting down to other agencies it is important that it provides the framework but does not also try to micro-manage the sub-contracting arrangements below that. [10 & 11]

## **4. Contract compliance**

### **4.1 Performance management**

The Refugee Council believes reporting and performance management arrangements need to be transparent and should be made available to a wide range of stakeholders. [11 & 12]

- The Refugee Council agrees that the Regional Strategic Co-ordination Groups (RSCG) could have a role in advising how the service is delivered, but we have some caution about any formal monitoring role. At present, RSCGs are not adequately resourced to carry out this role with regard to asylum support and they would need extra resources if their remit was to cover refugee integration services as well. [11]
- RSCGs are also at very variable levels of development and some are struggling to play a meaningful role. In addition, there are potential conflict of interests as service providers (and indeed those agencies which have lost out on contracts) may also sit on the RSCG. [11]
- Evaluation of performance management should be client focussed. The emphasis in judging service delivery should be on qualitative feedback from refugee clients not just on quantitative evidence of through-put. [11 & 12]

### **4.2 Quality and value for money**

We agree that it is essential that contract winners can demonstrate that the services they are delivering meet quality standards and represent value for money. We trust that the contracts will be specified in such a way that the focus is on long term outcomes not on short term inputs and outputs. [12 & 13]

- We agree that it is important for the Home Office to provide a “substantial amount” of time for potential bidders/contractors to develop partnerships and discuss arrangements with potential sub-contractors so that the service delivered will be genuinely inclusive. [10]
- It is also important that the Home Office does build time into the process for further negotiation with preferred bidders. [10 & 12]
- Targets and objectives set by contracts should be meaningful and take into account the delivery of a quality service not just the cheapest. Emphasis should be put on genuine outcomes and not on inputs and outputs. As in 4.2, we believe this can be achieved through on-going consultation with clients and stakeholders. [11 & 12]
- Performance measurements and targets should not be over-burdensome, so that service providers are not bogged down in excessive data collection and reporting. Some mechanism for measuring improvement is important so the targets need to take that into account. The

Home Office could use a few Key Performance Indicators drawn from its own Indicators of Integration. [11 & 12]

- We believe that better performance would be achieved by service providers if contracts were awarded on a 3 year or even longer time frame rather than annually. Such an arrangement would be in line with the Compact. [12 & 13]

## **5. Conclusion**

Finally, in order to improve provision of integration services to refugees across the country, we would like to see built into the strategy a means of sharing the good practice developed in different regions or different services. A number of models are available from different sectors and the NRIF's website could be developed as an effective knowledge management tool.