



The Refugee Council's response to the
Government's consultation document
published in July 2004:

"Integration Matters: A National Strategy
for Refugee Integration"

Refugee Council
October 2004

Introduction

The Refugee Council is the largest charity in the UK providing help and advice to asylum seekers and refugees. We also work with them to ensure that policy makers address their needs and concerns.

We welcome the Government giving a higher priority to the aim of refugee integration and note the considerable progress since April 2000 in understanding and responding to the many barriers faced by refugees to their inclusion as full and equal citizens in our society. We welcome the publication of this strategy for consultation. Refugee integration requires a multi-agency response; it is therefore appropriate that this process engages the many players that will be involved at national, regional and local and community level towards creating and implementing solutions to the current barriers.

General comments

Progress so far

The Refugee Council welcomes the progress made since the publication of *Full and Equal Citizens* to address the problems faced by refugees. We are in no doubt that the many project and initiatives outlined in this strategy amount to a serious and unprecedented effort towards refugee integration for which all those responsible should take pride.

The scope of this strategy

We are pleased that the scope of this strategy will be national and that there are some national elements such as the SUNRISE programme, for example.

However, in its current form, we do not believe that the strategy is national in the sense of delivering specific outcomes for all refugees across the UK. The specialist funding streams support mainly local or regional projects that may produce outcomes not available elsewhere. If the strategy is to consist of a few key elements that are delivered nationally, plus a range of local projects that represent good practice but are not available nationally, there should be a clear mechanism for disseminating good practice. Moreover, expectation of a national strategy is that it delivers outcomes across the entire country for all beneficiaries. If this is not the case it needs to be stated or it undermines the positive elements in the more limited strategy.

Collection and dissemination of good practice

Though the strategy emphasises the dissemination of good practice, there is no clear mechanism for doing this. To the extent that good practice is identified, it

is mainly through the evaluation of funded projects. Thus it does not take into account of other good practice in mainstream provision delivered by the statutory and voluntary sectors. The approach of the EQUAL programme towards spreading good practice is recommended.

Additionally, this integration strategy needs to be seen as a 'pilot' with a commitment to learn from its different component parts, not just disseminating but embedding, mainstreaming, and learning from what may not work.

Measuring success

We are pleased that indicators will be used to measure progress. But we stress the need for soft indicators to measure refugees' own perceptions as to whether integration measures are working. The current action plan, which has a horizon of one year, is insufficient. There should be a rolling three-year plan to recognise the long-term nature of integration. Detailed targets and milestones will be important for ensuring that this strategy achieves its objectives.

1. Detailed response to integration matters

1.1 Chapter 1 of the consultation document: What is integration?

We concur with the observations in this document that integration occurs when refugees are empowered to achieve their full potential as members of British society, contribute fully to the community, and access the public services to which they are entitled.

However the definition of integration places too much emphasis on the contribution refugees are expected to make and also sets a standard for the level of their contribution – "full" and "fully" – not applied to the wider community. The emphasis on access to services invites the reader to view refugees as consumers of services. We would suggest the following reformulation:

- Achieve their aspirations and potential as members of British society
- Take an active part in contributing to the community
- Exercise their responsibilities, rights and entitlements as members of UK society

A number of other principles are equally important to a conceptual and practical understanding of integration:

- Refugee integration must be a two-way process; as such it should not require assimilation but rather place responsibility on both host community and refugees to adapt.

- An inclusive and welcoming society is key for refugees to be able to successfully integrate.
- The integration process must begin at the point of arrival. It cannot be deferred until leave to remain is granted; the asylum process can itself take many months if not years.
- Refugees must be fully involved in developing and delivering integration strategies. The voluntary sector can help facilitate this by providing opportunities for refugee communities and organisations to represent their interests to service providers and decision-makers.
- Refugee integration requires co-ordination. The elements of integration are interrelated. For example, without secure and sustainable accommodation, labour market access can be impeded and vice versa. Such inter-dependence requires joined-up policy, delivery and co-ordination across central and local government, and other sectors.
- Ultimately, services to refugees should be delivered through mainstream frameworks. But, in some cases, specialist provision may be required as well as innovative approaches that can be learned from, and mainstreamed if they are “good practices”. For example, health services for refugees as victims of torture and trauma may be delivered most appropriately as a specialist provision. In other cases, specialist provision may be necessary to act as a bridge to the mainstream service.
- Refugees are a diverse group. For example, our experience shows that unaccompanied refugee children, and those with other special or distinct needs, are likely to require specific attention in policy development, service design and delivery.

1.2 Chapter 2 of the consultation document: Defining the challenge

We agree with the analysis of the challenge but would point out that it is wider and should include the particular experiences of women, disabled people and older people. But we are pleased that the vulnerability of unaccompanied refugee children is recognised.

The experience and needs of refugee women are often distinct and frequently overlooked by policy makers and practitioners. As women, refugees may have faced persecution related to their gender such as sexual violence and exploitation, but have been left to grapple with reception arrangements that are not sensitive to these experiences. Socially, refugee women are more likely to experience isolation and poor access to employment and services.

The presence of disabled people in refugee and asylum-seeking communities is often overlooked and evidence points to a range of unmet personal care needs¹.

Older refugees report feeling isolated and lonely. They report having limited knowledge about entitlements to services. They are more dependent on family members and so risk losing all independence. They are not expecting to get into jobs and so find it harder to integrate, whilst limited English means that older refugees are unable to get their views across effectively.

Achieving full potential

We agree that appropriate employment can make a significant contribution to integration. In addition to the barriers described, the following additional barriers are currently preventing refugees achieving full potential:

- Lack of knowledge of entitlements and statutory services provided by Jobcentre Plus impedes take up and hence access to services.
- Lack of adequate English language: English language proficiency mostly determines both labour market participation and the type of jobs refugees get. This strategy identifies the issue but not the lack of ESOL provision, the long waiting lists and the lack of English Language tuition.
- Attitudes of employers are a major barrier. Negative attitudes tend to be affected, in part, by negative press coverage of asylum issues. Refugees claim they cannot get jobs due to racism and racial prejudices. Employers are afraid of breaking the immigration and asylum law; they experience difficulty assessing overseas qualifications and cannot attach value to overseas work experience because it is difficult to equate it to a UK work record.
- Lack of UK work experience continues to impede access to the labour market for the vast majority of refugees. This is mainly due to most UK employer unnecessarily attaching value to it. As there are very few opportunities for volunteering, work placement, mentoring, supervised practice, clinical attachments for refugee doctors, refugees tend to be excluded from the labour market because they do not have any UK work experience.
- Many refugees are not familiar with the UK jobsearch culture. They come from cultural backgrounds where 'selling yourself' is regarded as not appropriate. As a result, many tend to 'undersell' themselves at interviews and many others do not know how to conduct an effective jobsearch. Evidence shows that more refugees find work through friends than any other route.

¹ Robert and Harris. *Disabled People in Asylum Seeker and Refugee Communities*. 2000.

Without even impinging on the question of the right for asylum seekers to work and to have full access to vocational training provision, which the Refugee Council strongly advocates, there are already lessons from EQUAL [Theme I] for asylum seekers and from other EQUAL themes (both from UK and European projects) that could alleviate or prevent some of the immediate impact of the problems listed above.

For example, research by the SEQUAL development partnership working with refugees in England under EQUAL/Employability reports that "Astonishingly, most employers do not consider refugees as a group to be targeted by or included in their 'Equality and Diversity' policies. They regard them as outsiders who do not qualify to be included in their Equal Opportunities policies".

Comments from the ASSET UK development partnership indicate that the asylum system is too bureaucratic. Documents issued both to asylum seekers and refugees are too difficult to understand; education providers and employers and those offering volunteering opportunities cannot distinguish who is entitled to work and who is not; mixed messages abound in the media and public perceptions. In the end, it may be too much trouble to try.

Contributing to the community

We concur with the observation that experiences at community level are fundamental to refugee integration. The strategy is right to note that following are key challenges such as preventing racial harassment, encouraging alternative approaches to stereotyped and oversimplified portrayals of refugees, building the capacity of refugee community organisations, improving the ability of refugee community organisations to sustain funding, and supporting unaccompanied refugee children to build links with members of their national or ethnic community in order to avoid isolation and social exclusion.

The strategy fails to note the impact that competition for scarce resources can have at integration at local level. There is a significant overlap of dispersal areas and the 88 most deprived wards identified by the Neighbourhood Renewal Unit. The strategy needs to join up with dispersal and regeneration policies and practice to ensure that all are promoting refugee integration at community level.

Whilst the strategy recognises the vulnerability of unaccompanied refugee children, it should also recognise the contribution they can and do make to local communities.

The strategy should also promote a wider understanding of the role refugee community organisations play in integration so that local authorities and others take refugee communities into account and involve them in local initiatives and strategies.

1.3 Chapter 3 of the consultation document: Mobilising resources

Refugee integration requires leadership and it is right that the ministerial and departmental lead is allocated to the Immigration and Nationality Directorate (IND). However, a cross-government, interagency approach is essential. Key government departments include the Home Office, the Department of Health, the Department of Work (DWP) and Pensions and the Department for Employment and Skills and the Office for the Deputy Prime Minister. The DWP's refugee employment strategy is an example of good practice that should be recommended to other government departments.

A significant aim of this strategy should be to mainstream refugee integration. But mainstreaming needs to have a wider meaning which goes beyond access to services and includes participation and involvement in mainstream initiatives and structures. Local authorities, regional bodies and national programmes (such as Neighbourhood Renewal, Civil Renewal, Active Citizenship, Community Cohesion) all need to take into account and involve refugee communities. As the lead department, the IND has a significant role to play in securing the commitment of other national and local agencies.

A significant resource can be mobilised through the regional consortia. Their integration strategies should be framed in response to the challenges, objectives, standards and benchmarks outlined in this strategy.

The regional dimension

Regional planning for integration will be the responsibility of the regional consortia and co-ordinated by the National Refugee Integration Forum (NRIF), which will disseminate best practice between regions.

The strong presence of asylum seekers and refugees in regions outside greater London makes regional planning and coordination of refugee integration essential. Regional planning and coordination of integration can be improved through the following:

- Commitment to refugee integration from key regional agencies such as regional development agencies, government offices, regional assemblies, regional consortia, regional voluntary sector networks and for a is needed.
- The Home Office needs to work closely with government offices in the regions to ensure that regionally determined policy and strategy (such as regional economic strategy and regional housing strategy) links effectively with the national refugee integration strategy.
- A strong lead is required from the Home Office to ensure refugee integration is integral to strategy and policy developed by other government departments, and is delivered at a regional and local level, for example, neighbourhood renewal.

- Regional strategies determine allocation of resources within the regions. It is therefore increasingly important to ensure the needs of refugee communities are reflected in these documents.

In Yorkshire and Humberside, the Refugee Integration Group brings together key regional agencies to provide a strategic level lead such as on developing the regional integration strategy, and ensuring close connection and partnership working with organisations and statutory services within the region.

Engagement and commitment from the Government Office for Yorkshire and Humber, the Yorkshire and Humber Assembly and Yorkshire Forward has been key to the success of the group in promoting refugee integration as a priority area of work in the region and seeking to draw in additional resources to deliver activity.

Voluntary and community sectors

One of the achievements since the publication of *Full and Equal Citizens* in November 2000 has been the cross-sector approach to refugee integration and a recognition of the role of the voluntary and community sectors. Voluntary organisations that specialise in work with refugees and refugee community organisations have an important role to play in refugee integration for a number of reasons:

- We have expertise in working with refugees and the ability to mobilise resources within communities and in doing so, empower those communities.
- We can facilitate the involvement of refugees in developing and delivering integration strategies by providing opportunities for refugee communities and organisations to represent their interests to service providers and decision-makers.
- We make extensive use of volunteers often drawn from refugee communities. For refugees, this experience can be opportunity to gain UK work experience as well as be a pathway into employment.
- Our flexibility means that we can develop services quickly and have had to do so during the Kosovo and Bosnian programmes.
- We can provide a supportive environment, which is important for refugees whose experiences may lead to them being suspicious of people in authority.
- We have specialist service providers. The Medical Foundation for the Care of Victims of Torture, for example, provides health, mental health and social care services to asylum seekers and refugees who have been the victims of torture. The Refugee Council's specialist team offers advice and advocacy

for individuals in need of health and social care services. Without such services, vulnerable refugees would remain outside mainstream service provision.

- The voluntary sector can act as a bridge to mainstream services. For example, the Gateway Protection Programme provides a comprehensive package that strives towards empowerment and self-sufficiency of resettled refugees within a 12-month period.

It does this through a brief orientation overseas, followed by a more detailed induction programme supported by a partnership of refugee sector organisations on arrival, which also provides support workers who ensure access to GPs (although primary care trusts are consulted before arrival as are local education authorities and housing). The DWP is included in the process with regards to benefits and the provision of national insurance numbers.

Another key aspect of the Programme is regional capacity work with local faith groups, community and refugee community groups. The Gateway Protection Programme provides an interesting model of good practice. It is a partnership between government and the voluntary sector, which through communication between the partners is able to provide co-ordinated services and value for money.

Co-ordination: The National Refugee Integration Forum and subgroups

The National Refugee Integration Forum (NRIF) and its subgroups are crucial to the implementation of the strategy and ensuring momentum for refugee integration. Based on our experience of participating within these structures, we would make the following recommendations:

- The recommendations of the NRIF and its subgroups are widely disseminated to relevant government departments, service providers and others to stimulate further such initiatives.
- Membership of the NRIF should be published and a mechanism put in place for reviewing membership and admitting new members.
- Membership of the subgroups should be published and a mechanism put in place for reviewing membership and admitting new members.
- The work and recommendations of the subgroups should be more widely available, since it often goes beyond what is incorporated in the strategy.
- Refugee membership of both the NRIF and subgroups should be increased, and subgroups should be encouraged to adopt wider consultation

mechanisms that enable refugees and others to inform and confirm their recommendations.

The major funding streams

We recognise the immense value of the funding programmes set up to support refugee integration like the Refugee Community Development Fund, the Challenge Fund and the European Refugee Fund. In addition, the Invest to Save Fund has been restructured to ensure it has refugee integration as one of its objectives.

We would recommend that all funding streams have clear, transparent criteria for assessing bids. Criteria should reflect key integration outcomes and be designed to complement funding from other statutory and non-statutory sources. The contribution of other funding streams to the refugee integration objectives should be made public.

1.4 Chapter 4 of the consultation document: Progress so far

General

Though they all represent progress towards refugee integration, it is not clear that all initiatives (such as the work of the Lawrence Steering Group) cited in this chapter are actually the result of having a national refugee integration strategy. This should be made clear, and one of the aims of the strategy should be to map all work that promotes integration, whether it emanates from the strategy or not, and develop the strategy to address any gaps.

Despite the significant progress outlined in this chapter, progress tends to be reported in terms of outputs rather than actual outcomes for refugees. This should be acknowledged and an aim of the strategy should be to report on future progress in terms of indicators that reflect tangible outcomes for refugees, such as statistics showing that racial incidents against refugees have decreased, effective support has been provided for victims and more perpetrators have been effectively dealt with.

Despite the significant progress outlined, much more remains to be done both in relation to those policy areas considered in the consultation document, and other areas which are equally important yet not directly addressed. The Refugee Council's *Agenda for Integration*² sets out a comprehensive set of recommendations for practical and policy-related action needed to increase refugee integration.

Although we respond in brief to the policy areas addressed in *Integration Matters*, the Refugee Council's *Agenda for Integration* provides a more

² Refugee Council. 2004. *Agenda for Integration(consultation draft)*.

comprehensive response to the question of what more needs to be done and by whom to achieve refugee integration.

Achieving full potential

The Refugee Council welcomes the progress described in the strategy document, particularly the DWP's research into labour market barriers facing refugees and their refugee employment strategy. However, much more can be done to address the significant challenges set out in the previous chapter.

More can be achieved through partnership between the public, private and voluntary sectors. The Home Office (HO) should encourage partnership working at high strategic level between the DfES, the DWP, the DoH, the Office of Deputy Prime Minister (ODPM), and the regional development agencies (RDAs) to support the needs of refugees.

We are pleased to note that the strategy recognises the fact that refugees are "individuals, with complex and diverse backgrounds, skills and qualities". We also commend the Department of Health for investing £2 million in supporting refugee health professionals in the UK in the last four years. However, we would like to emphasise that refugees with professional qualifications such as doctors, engineers and dentists, face additional barriers and many are still in dire need for support to access the UK labour market. We urge the Home Office to work with the DWP, Jobcentre Plus, the DoH, NHS trusts and the voluntary sector to support the needs of refugees with professional qualifications.

Examples of positive work under the EQUAL action programme, which could inform development of integration for refugees as well as asylum seekers, are:

- Conducting skills audits for asylum seekers and preparing personal development plans, CV writing, on-line interview skills, information about access to language provision for adults, further and higher education, vocational training and employment
- Provision of high quality intensive English language programmes tailored to the asylum seekers'/refugees' prior experience or aspirations and linking such programmes to work placements offering a 'fast track' to improving the English language and work-related skills at the same time
- Promoting the need for greater diversity in ESOL programmes to reflect the diversity of the potential participants thereby helping them progress more quickly
- Training and capacity-building for institutional staff, advice and guidance workers and teachers who deal with asylum seekers and refugees
- Opportunities for volunteering and work shadowing which make refugees 'job-ready'

- Public awareness about asylum seekers' and refugees' potential in the labour market
- Opportunities for asylum seekers to begin to integrate more quickly in the region where they most likely will stay after a positive decision
- Identifying, disseminating and mainstreaming new approaches and models of good practice as well as networking in UK and Europe
- Learning from and sharing with EQUAL European partners and partners in Scotland

We are concerned that by maintaining a dichotomy in policies in relation to asylum seekers and refugees, integration is actually hindered. We believe that activities that asylum seekers engage in such as learning English language, vocational training and gaining work experience through volunteering at the reception phase, contribute positively towards their integration in the UK labour market and society. We urge that the Home Office to permit asylum seekers to train and work.

Contributing to communities

We believe that the following action needs to be taken to ensure that refugees and asylum seekers feel safe within their communities:

- Prevent racial harassment and attacks through improved public awareness
- Support victims by ensuring that both generic and specialist agencies have sufficient expertise and resources to support all victims of racial harassment and attacks, and are equipped to meet the special needs refugees may have (such as language, isolation, unfamiliarity with the UK system)
- Deal effectively with perpetrators by ensuring that generic and specialist agencies have sufficient expertise and resources to deal effectively with perpetrators of racial harassment and attacks against all communities, and that they are equipped to meet the special needs refugees may have in helping to deal with perpetrators (such as language, isolation, unfamiliarity with the UK system)

Promoting positive images

We do not believe it is possible to promote positive images of refugees effectively without promoting positive images of asylum seekers, particularly when the terms 'refugee' and 'asylum seeker' are used interchangeably within negative media reporting.

We recommend the following actions to improve positive images of asylum seekers and refugees:

- Remove the distinction between asylum seekers and refugees, and promote stories that link the journey of someone fleeing their home country, becoming an asylum seeker, and then receiving refugee status or humanitarian protection
- Neutralise and humanise the language used about asylum seekers. Many Government publications and announcements use negative language such as 'abuse of the system', without any positive references such as human rights or protection. This does not portray the full picture of seeking asylum. Using language in a more balanced way can contribute significantly to better community relations.

The strategy should look beyond the media for ways of promoting positive images of refugees. Statutory and local bodies, such as health and education authorities, tenants associations, libraries, and trade unions should be specifically resourced and supported to be better placed to promote positive messages within their communities.

Good practice should be disseminated through government, local authority networks and the voluntary sector through regular communications channels.

Opportunities for exchanges of ideas should be established through the regional government offices, and other forums to bring groups together to discuss ways and means of promoting positive images and challenging misconceptions.

Community links

The following action needs to be taken in order to build up the role of refugee community organisations:

- Mapping their numbers, activities and role in integration, then using these findings to raise awareness of refugee community organisations' activities among local authorities, statutory agencies, service providers, infrastructure agencies and others so that they can involve and support refugee groups to further integration
- Identifying and promoting appropriate principles, practice and models for refugee community development among refugee communities, specialist and generic second-tier agencies and community development practitioners
- Identifying and implementing measures to improve or expand both generic and specialist capacity-building support available to refugee community organisations

- Identifying and implementing measures to ensure that refugee community organisations are actively involved in mainstream structures and initiatives such as community empowerment networks, local strategic partnerships, crime and disorder partnerships, New Deal for communities, Civil Renewal, Active Citizenship and community strategies. All these strategies need to identify whether there is sufficient presence of refugee communities and how to include them.

Education

Whilst we note the importance of Ethnic Minority Achievement Grant to ensuring language support to refugee children, changes in funding formula means increased funding to local education authorities (LEAs) with large numbers of settled black and minority ethnic (BME) communities such as the African Caribbean and Bangladeshi communities, which are underachieving, and loss to LEAs with early stage English as an Additional Language learners, usually new entrants and asylum-seeking and refugee children. This is likely to reduce funding to many LEAs in dispersal areas.

Although the Vulnerable Children Grant was not brought in to replace the one-off £500 per NASS dispersed child grant, the fact that the one ended as the other one went on stream was unfortunate as it was seen as a replacement.

The Vulnerable Children Grant guidance suggests that decisions about allocation should incorporate representatives from all relevant services. But this is not statutory and there is some evidence to suggest that refugee children's needs are not being represented or heard in some local authorities. We would recommend that the DfES provide formal guidance and good practice, and monitor in relation to refugee and asylum-seeking pupils.

The evidence base

We note the achievements so far, particularly with regard to extending the refugee integration evidence base and in particular efforts to map existing research (mapping the field volumes II and I).

A further challenge lies in ensuring that research findings are communicated in an easily digestible form to practitioners. Further work needs to be done to ensure that research findings from other sources feeds into the development of this strategy.

3.5 Chapter 5 of the consultation document: Delivering new solutions

The SUNRISE Programme

The barriers to integration are inter-related and overlap. This is why the Refugee Council welcomes the holistic and integrated approach to move-on support being proposed in the SUNRISE Pilot and the Personal Integration Plan.

The very many complex (often structural) barriers to integration mean that refugees give rise to a need for intensive support through information, advice, referral and advocacy to help overcome these barriers. An inherent difficulty with offering each refugee a one block of time with an adviser during the 28-day period is that urgent needs such as housing will dominate, with little scope to explore other important but perhaps less pressing needs such as employment and training. We would recommend a phased approach to address a hierarchy of needs not just housing.

The Refugee Council welcomes the fact that a key role is being proposed for the voluntary sector. Our unique contribution lies in our impartiality and desire to act in the best interests of refugees. Refugee voluntary and community organisations are well placed to draw on their extensive experience multi-disciplinary casework and their ability to develop partnerships with a range of voluntary, statutory and private sector agencies in order to deliver this.

This is an important project. It is important that tender documents are drawn up in such a way that it is clear what is required and that allows sufficient flexibility for innovation.

Adequate resources will be essential if this programme is to be effective. Funding will need to be allocated to ensure that participating organisations can develop caseworkers to deliver high quality, multi-disciplinary advice and support.

We are pleased that this programme will be tested out before implementation. In our experience, support needs vary significantly depending on local context. We would be keen to see this programme tested out in a variety of different local contexts which trial a range of different service models.

3.6 Chapter 6 of the consultation document: Taking integration forward

We agree with the framework of indicators set out within the consultation document but have further suggestions.

There needs to be one indicator for contributing to communities that specifically reflects the role of refugee community organisations in integration.

One possible indicator might be the number of refugee community organisations involved in both national, regional and local authority-led bodies and initiatives, including community empowerment networks, local strategic partnerships, crime and disorder partnerships, local multi-agency bodies for asylum seekers and refugees, community strategies, regeneration projects, Civil Renewal, Active Citizenship, and community capacity building.

This indicator would reflect the number of refugee community organisations and the extent of their activities (in this sphere, though not in terms of services to their communities), and directly reflect their contacts with local government and other statutory bodies. It would also serve as an incentive for local authorities to establish links with them.

We would like to see the educational attainment of refugee children measured through the indicator showing the number of refugee children gaining five or more GCSE passes broken down by nationality.

This would require the DfES to revise current methods of monitoring achievement and attainment. Current national ethnicity monitoring categories are too wide and cannot show variations between small ethnic or language groups. For example, within the Black African group, there is no distinction between Somali refugees and cannot distinguish between Somali refugee and Nigerian expats.

As well as indicators, we would stress that a detailed three-year action plan with targets and milestones will be just as important for ensuring that this strategy achieves its objectives.

Refugee integration loans and changes to local connection provisions

We are concerned that both measures will fail to make a significant contribution to refugee integration. Refugee integration loans will not be available to many individuals who come within the scope of this strategy, such as those with exceptional leave to remain or discretionary leave. Of those able to claim the loan, it is not clear how this improves on the previous eligibility to backdated benefits payment.

The local connection provisions are unlikely to affect decisions about where refugees settle. This is because, ultimately, refugees will settle in those areas where they believe they will have the best chance of creating a safe, secure and welcoming home for themselves and their families.

**Refugee Council
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