

# Refugee Council

## policy response



### ***London Enriched: The Mayor's Draft Strategy for Refugee Integration in London***

#### **Introductory comments**

The Refugee Council is the largest charity working with asylum seekers and refugees across the UK. We campaign for their rights and help them to rebuild their lives in safety. We welcome the lead strategic role that the Mayor has taken on refugee integration work in London and the new partnerships that he is helping to create as part of this strategy. Our chief executive is a member of the Board for Refugee Integration in London (BRIL) and we are committed to supporting the work of BRIL and the wider work programme resulting from this strategy.

The Refugee Council welcomes the GLA's consultation for the Refugee Integration Strategy for London, which we believe contains important and useful proposals for successful refugee integration in London. We support the five core themes and the three cross cutting themes (data collection and monitoring, community cohesion and equalities).

We look forward to working with the Mayor, BRIL, and our partners in developing this strategy.

#### **1. Remit**

**Asylum seekers:** We are pleased that the Home Office has recently agreed to extend the Mayor's remit to include the reception of asylum seekers in London. We note that the current draft strategy does not yet reflect this, and look forward to an opportunity to comment on these aspects in due course.

We also hope that there will be an opportunity to consider the issue of people in London who have been refused asylum, but for whom there is no imminent prospect of safe return (for example Iraqis and Zimbabweans). Significant numbers of people in London are destitute and not eligible for free secondary health care; while only some are living on vouchers (supported under Section 4 of the 1999 Act). The consequences for individuals, families and communities are grave. It is vital that a strategy for London takes account of this situation, and commits to seeking improvements. A failure to do so would undermine any progress made towards more cohesive, safe and healthy communities.

**Migrants:** We are aware that for London, for many communities and for London boroughs, the wider issues of new migrant communities are increasingly significant. There are some similarities with the agenda concerning refugees and asylum seekers, but there are also important differences. At this stage, we would recommend that the focus of the majority of

activities proposed in this strategy is not extended to wider migrant communities, although there will be important areas of shared learning and practical projects may well benefit both groups. However, we appreciate that the Mayor may consider that he needs to include the wider needs of new migrant communities in this strategy. If he does take this option, we would still recommend that there is a distinctive element of this strategy that focuses on the unique needs of asylum seekers and refugees.

## **2. Impact of the Border and Immigration Agency case resolution programme**

The ongoing BIA programme to resolve the cases of those who claimed asylum prior to April 2007 will have implications for the Mayor's strategy. We hope that the Mayor will receive timely and accurate information from BIA on the progress and outcomes of the case resolution programme so that his strategy can take account of these developments.

## **3. Data collection and monitoring**

We welcome the analysis in section 4.4 concerning the need for improved data on asylum seekers and refugees. We endorse the initiatives suggested in the strategy and would be keen to assist with work to develop effective data collection mechanisms. It will be useful to involve service providers in order to ensure consistency in definition and methodology and to build on the work that is being done by refugee agencies nationally on data collection.

## **Chapter 5: Housing**

### **We agree that the proposals will help achieve integration in the area of housing.**

We know from our direct work with new refugees in London that housing is one of the major early challenges when gaining status, and we welcome the specific focus on housing in this draft strategy. In particular we share the concerns about the need to address the specific needs of refugee women, refugee children, disabled refugees and older refugees.

We have the following additional suggestions/comments:

1. **Proposal 5A – the Mayor's Housing strategy:** We welcome the proposal that the Mayor's Housing Strategy for London addresses the needs of the city's refugees. We know that there are initiatives across London to address this issue, but there is a need to highlight this issue at a pan-London level. In particular we would like to see the involvement of RCOs working on housing.
2. **Proposal 5B – housing supply:** We welcome the New Migrant Demonstration Model and we are keen to explore how we and our RCO partners might be able to add value to this initiative.
3. **Proposal 5C – Co-ordination:** We fully support the introduction of a London wide co-ordinating group on housing and would be keen to either to be involved or to suggest possible participants.

4. **Proposal 5D – borough role:** We support the suggested role for the boroughs especially in terms of integrating the needs of refugees into local housing strategies and ensuring refugee participation.
5. **Proposal 5E – partnership:** We know that there are many mainstream providers that are keen to work in partnership with refugee groups, so we welcome initiatives that foster mutual learning. In particular we are keen to encourage partnerships between RSLs and RCOs working on housing issues. There is much anecdotal evidence of the reluctance of asylum seekers and refugees to complain about poor provision or treatment from public and private service providers, including housing providers, which is a barrier to them exercising their rights. We suggest that the partnership between mainstream providers and refugee groups includes development of **advocacy and complaints tools**.
6. We think it will be important to include a **communications strategy** within housing-related parts of the strategy. This is because the provision of housing has the potential to cause hostility among sections of the media and the public that believe asylum seekers and refugees receive preferential treatment.

## Chapter 6: Employment, training and enterprise

### We agree that the proposals will help achieve integration in the area of employment, training and enterprise.

We have the following additional suggestions/comments:

1. **Proposal 6A - ETE maps: Find Your Way:** We would like to suggest that the Mayor considers using a model similar to that developed in Scotland where agencies share a common database.<sup>1</sup> This is able to record advice sessions, training and development plans. There is also potential to link with mentoring for employment.<sup>2</sup> We would encourage the Mayor to include capacity building for RCOs in giving ETE advice and guidance integrated into ETE and Community Development proposals.<sup>3</sup> In addition, it would be helpful if routes into work included an **employment rights and entitlements** element.<sup>4</sup>
2. **Proposal 6B: Employer Role:** To achieve progress on this element of the strategy, we would encourage the Mayor to work with DWP and the Department for Innovation, Universities and Skills to ensure ESOL for refugees in work-based training and allowing them to access higher level learning while remaining employed. In addition, London's experience

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<sup>1</sup> For further details of integrated partnership working, see

<http://www.bridgesprogrammes.org.uk/index2.html>, last searched 14 September 2007

<sup>2</sup> Developed under the Equal funded EASI DP. See <http://www.refugee.org.uk/welcome.htm>, last searched 14 September 2007

<sup>3</sup> The training for RCOs delivering business start up advice and toolkit developed through Refugees into Business is an example of such work. See [http://www.refugeesintobusiness.org.uk/toolkit\\_A/](http://www.refugeesintobusiness.org.uk/toolkit_A/), last searched 14 September 2007

<sup>4</sup> The TUC is working with the Refugee Council to develop a *Know Your Rights* guide for refugees and asylum seekers with permission to work.

in this area could be used to advocate for greater DWP/JCP flexibility for individual refugee customers. This would help to ensure that access to appropriate rather than contracted training provision. We also think it will be useful to engage West London Working and the East London City Strategy Pathfinder pilots in recognising refugees as a distinct group for support. In addition, we think it would be useful for the Mayor to develop mentoring and work experience programmes particularly with the private sector<sup>5</sup> and encourage companies to become advocates for the positive experience of employing, training and supporting refugees. A related aspect of this work could be the provision of training for mainstream information, advice and guidance agencies, trade associations and employers themselves on employing refugees, covering issues around status, documentation, rights and entitlements.

3. **Proposal 6C: Skills:** We fully support this part of the strategy. We suggest that it would be helpful to develop models for accrediting previous learning and experience (APEL), along with looking at the current system of recognising qualifications through the National Recognition Information Centre (NARIC). APEL techniques need to be portfolio and work based. We would like the final strategy to encourage partnership working between the voluntary and community sector, and the mainstream, to support refugee professionals.
4. **Proposal 6D: Enterprise: business start up<sup>6</sup>:** To support business start up, we would like to see refugees established as part of the enterprise strategies for London, and support for refugee awareness training for mainstream business advisers. In addition, this part of the strategy could usefully include business development for ongoing support to start ups and current enterprises and an explicit link between community development and the potential of social enterprise. We also think that it will be important to promote the financial inclusion of refugees (for business and personal banking).
5. **Proposal 6E: Informal Sector: Pathways to the mainstream:** We agree that this issue is very important and welcome the suggestions concerning research and exploration. We would recommend that the Mayor use community researchers to conduct any research in this area. We would be happy to support the development of any such research. However, we would encourage any work on this issue to be underpinned by a clear definition of the term 'informal sector'. The use of the term can be both unlawful working, where someone does not have permission to work, and undeclared work, where someone has entitlement to work. Asylum seekers are likely to fall into the first category; refugees the latter. In addition, given that we do not know the extent of involvement in the informal economy amongst refugees and asylum seekers, we think it is unhelpful at this stage to link illegal entry and the experience of claiming asylum in the UK with knowledge of unlawful working opportunities.

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<sup>5</sup> The Refugee Council has experience of engaging employers. At present, we are working with a number of financial institutions in an employee mentoring project. Employees mentor a refugee with a finance background in developing job search and work skills.

<sup>6</sup> The Refugee Council led on Refugees into Business (RiB) supporting refugee enterprise. RiB was funded through the DTi throughout 2006. Further information, please see [www.refugeesintobusiness.org.uk](http://www.refugeesintobusiness.org.uk), last searched 22 October 2007

## Chapter 7: Health

**We agree that the proposals will help achieve integration in the area of health.**

We support of all the proposals for action on health outlined in the strategy. We welcome the inclusion of the needs of the city's asylum seekers and refugees in the Mayor's Health Inequalities strategy. We further support the measures to promote refugee participation and to develop a greater evidence base. We are concerned at the current confusion concerning the right of access to health care for asylum seekers and we would be keen to work with the Mayor to convey the facts on health care access to all health care providers in the city. We also welcome the inclusion of a mental health strand and the commitment to work with RCOs.

We have the following additional suggestions/comments:

1. We suggest that the proposed training for health professionals should **include 'front line' or reception staff** as they are the first point of contact for a patient at a GP surgery for instance and often act as the 'gatekeeper' for services.
2. The Refugee Council thinks the proposals for additional work in the health arena are excellent and the analysis on which they are based shows a thorough understanding of the issues. We would like to see the development of a **detailed plan to resource these initiatives, including statutory and charitable funders.**
3. The implementation of the strategy should draw on the experience of the Refugee Council and other voluntary sector organisations, which currently provide health services to refugees, to **learn from good practice and share knowledge.**
4. We hope that the Mayor's involvement in strategic approaches to refugee health in London will provide **evidence and a platform for challenging the 2004 NHS regulations on access to health care for overseas visitors**, which mean that end of process asylum seekers cannot access non-medically essential secondary health care for free. While training health service staff about entitlements will reduce the number of people wrongly denied access in the strictly legal sense, there are still hundreds of asylum seekers in London who will continue to be denied access. The Refugee Council looks forward to discussing this issue further when the asylum seeker elements of the strategy are developed.

## Chapter 8: Community safety

**We agree that the proposals will help achieve integration in the area of community safety.**

We welcome the proposals for action outlined on community safety and in particular we have the following additional suggestions/comments:

1. We recommend that the Mayor gather **evidence on, and develop a strategy for dealing with, issues of refugees and asylum seekers in the criminal justice**

**system.** There are an increasing number of prosecutions for recently introduced immigration offences (for example prosecutions for failing to produce a valid passport or travel document at interview under S2 of the 2004 Act). Asylum seekers convicted of such for such offences will serve prison sentences. It would be useful for the Mayor to take account of the immigration related nature of certain offences, and to consider the provision of criminal and immigration legal advice in this aspect of his strategy.

2. The **use of police cells by the immigration service** has been shown to be an issue for communities. There is a general policy position that use of police cells will be avoided where possible, but provision exists for them to be used for up to seven days. This occurs particularly when there is a lack of bed space in the immigration detention estate. Anecdotal evidence suggests individuals' needs are not met in police stations if they are there at the behest of the immigration service, and this has a knock-on effect on community relations with the police. We encourage the Mayor to coordinate information and liaison between the MPS and BIA in London to improve this situation.
3. We note that two of the **largest immigration removal centres (IRCs) are in London:** Colnbrook and Harmondsworth. At Harmondsworth a mixed population exists including asylum seekers who are detained while their asylum claims are fast tracked. We look forward to discussing this impact on London when the asylum seeker aspects of this strategy are developed.
4. We suggest that particular and prompt attention is given to the issue of **joint police/immigration service campaigns related to fare evasion and knife carrying.** There has been the suspicion that these can too easily become discriminatory in their application and can therefore be intimidating to refugee communities.
5. We hope that the monitoring and harm reduction proposals (8 d) will result in **protocols and agreements to improve the operations of Enforcement in the process of removal.** These activities can be immensely intimidating with large numbers of officers using tactics apparently designed to anticipate and quash any resistance. There have been allegations in the past that these tactics can be wholly disproportionate.
6. We welcome the inclusion of strategies to tackle domestic violence. The Refugee Council has been involved in work with the MPS on this issue. There is a need to **resource the involvement of women-led refugee community organisations and networks** so that they can be involved in any new work in this area. We would suggest that the final strategy uses the term **gender violence**, in recognition of the fact that destitution and risk of homelessness makes women more vulnerable; protection for women at risk of sexual abuse needs to be included under gender violence strategies.
7. We are very pleased that the strategy acknowledges that women with insecure immigration status are one of the key groups who are poorly served by current provisions. We hope that evidence from work in London can form the basis for joint lobbying to achieve changes in policy that will ensure survivors with no recourse to public funds can access safety and justice. Similarly, we would be keen to see the

evidence from London used to challenge situations where the BIA's Domestic Violence Policy is not appropriately administered, implemented or monitored.

## **Chapter 9: Refugee children and young people**

**We agree that the proposals will help achieve integration for children and young people.**

We welcome the proposals for action outlined for refugee children and young people, in particular the commitment to include young refugees into every aspect of the *Every Child Matters* (ECM) framework. We are pleased that this strategy is for all refugee children, and is inclusive whilst recognising the specific needs of children with their families and those who are separated from parents or usual carers. We are happy to support the work of the Mayor's office where we can offer specialist expertise and/or experience, for instance through our Panel of Advisers for Unaccompanied Refugee Children.

We have the following additional suggestions/comments:

1. We agree that it is the case that "*provision for them [children] is inconsistent across London, even for example, in the sums of money they get for their support.*" However, whilst we would agree that local authority support across London should be provided according to the same principles, we suggest that services should be provided on the basis of identified needs rather than as 'packages' that can be easily compared with each other.
2. We agree that **Proposal 9C Stay Safe** is important in seeking to address the issue of trafficking. However, we would like to see the strategy call for action to protect those who are at risk of exploitation not because they have been trafficked but as a result of inadequate support e.g. those living with little or inadequate adult support.
3. Chapter 9 rightly acknowledges the lack of appropriate or specialist advice services for children in the asylum system; we suggest that a recommendation to ensure this gap in provision is addressed be included in the recommendations under section 9D.

## **Chapter 10: Community development, participation and funding**

**We agree with the approach of doing further work on community development options before publishing the final draft of the strategy.**

We have the following comments on the options put forward:

**A) Set up refugee-led subregional "hub" structures:** We think that this is an interesting idea and would be consistent with the sub-regional development in other sectors such as housing. We think however that the initial focus should be on supporting individual RCOs and encouraging the development of borough networks. The idea of sub-regional "hubs" might be an excellent second stage of this development.

**B) Promote the development of borough refugee fora:** A potentially good idea though the emphasis should be on supporting existing refugee fora by providing resources and developing their capacity to function as effective structures and to advocate and support the refugee sector locally and to feed into London wide structures. For example: each borough could have a refugee fora which could feed into Board for Refugee Integration in London (BRIL).

**C) Through subregional or borough structures, and working where appropriate with mainstream specialist agencies, promote RCO specialisation:** It is a good idea that mainstream specialist agencies share their specialist knowledge with RCOs through subregional or borough structures. This could prove useful for those agencies as well as for RCOs; it offers mainstream specialist agencies the prospect of learning from community-based initiatives.

For those RCO projects that already have a specialist focus e.g. in health, housing, or education, this option would be beneficial. However, care must be taken to ensure that implementation of this option is not at the expense of an RCO losing its 'holistic' role in acting as a focal point for a community, its ability to understand and its drive to respond to challenges that come from the wide range of needs and demands experienced by the community – and inevitably some of these needs and demands will be other than those presenting themselves to organisations with a narrow specialisation. We remain very interested to play our role in helping to connect RCOs with mainstream specialist agencies.

**D) Get agreement with second-tier bodies that specialise in refugee issues, and have pan-London scope, on how they can contribute strategically to refugee community development for London:** If this option is adopted then specialist agencies should be required to set out clearly what specific support they can deliver at subregional or borough level. Similarly protocols, based on best practice in collaboration and inclusiveness, should be agreed when any joint mechanism is established.

**E) Get agreement with with mainstream or generic London agencies:** The points made above (option D) also apply to agreements with mainstream or 'generic' agencies, and we are keen again to help with such a process in London

**F) Establish a London small grants programme:** We support the establishment of a London small grants programme.

**G) Get agreement - from agencies responsible for distributing EU funding in London and other leading funders – on a coordinated and stable system to ensure resources to match EU grant for projects that fit the aims of this strategy:** At present EU grants are not accessible to RCOs due to the difficulties in obtaining the required match finding. Effectively this requirement acts as a barrier to fair treatment and fosters uncompetitive practice. This option offers an opportunity to widen appropriately access to EU grants. We support this option.

**H) Building on existing training resources, launch a London-wide programme for refugees to tackle barriers to their participation in governance, including public services consultative or governing bodies, as well as the electoral political process:** Additional resources should be sought from local and central government and from agencies whose remit is to increase citizens' participation in public life.

**I) Explore ways of moving towards more formal pan-London representation of the city's refugees and asylum seekers, including discussion with London Refugee Voice, Evelyn Oldfield Unit and other existing organisations with city-wide remits:** In undertaking any moves towards a prospect of formal representation of refugees and asylum seekers in London, the diversity of the city's asylum seekers and refugee population should be acknowledged. This diversity, whilst offering significant challenges, is a strong characteristic of the sector and one of its strengths. Particular care needs to be given so that all groups within the city's refugee and asylum seekers have the opportunity to express their views; in particular we are concerned that women may be marginalised. We would support this proposal and are interested to be involved in any such discussion.

In addition, we have the following additional suggestions/comments:

1. It would be useful for the strategy to emphasise the importance of **informing refugees about their political voting rights and strongly encouraging participation**. We are glad this is mentioned on page 64 – but funding needs to be made available for this. This would help to develop stronger representation of refugees in wider society.
2. It is accepted that there has been a rapid growth in the number of RCOs however we are concerned that there is not enough evidence to support the assessments about RCOs' proliferation in representing 'one' ethnic community. The experience of the Refugee Council is that most RCOs may state their priority group, but in reality they see whoever comes through the door and requires their services. **It would be useful to support RCOs by giving better guidance in accurately conveying to funders who their client group is.**
3. Partnership between RCOs is a complex area, and we think that the strategy should reflect this. We agree that more partnerships should be encouraged, but suggest that this will also entail not just addressing the restrictive funding rules as stated in the strategy. **There needs to be an approach to tackle the problems that can undermine effective partnerships among RCOs. We would suggest that more advice, training and guidance would help RCOs think about how to enter into partnerships effectively to gain mutual benefit.**
4. We would encourage the community development aspect of the strategy to carefully consider the issue of specialisation by RCOs. In the experience of the Refugee Council, RCOs often provide niche services to their client group that are not provided by public services. Specialisation may work for some areas of London and some organisations and not others, depending on the need in that area of London etc. **We would**

recommend a comprehensive mapping exercise be undertaken of available services to determine the services that it would be feasible and financially viable for RCOs to specialise in.

*Prepared by the Policy and Development Directorate, Refugee Council  
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