

## Nationality and Borders Bill 2021-22 – Committee Stage (House of Lords)

### About the Refugee Council

Refugee Council was founded in 1951, in the wake of the establishment of the UN's Refugee Convention that year, of which the UK was a founding member.

The organisation works with refugees and people seeking asylum in England, delivering a wide range of services including refugee resettlement, support for unaccompanied children in the asylum system, specialist mental health support for refugees, and emergency integration support in areas such as housing and welfare benefits.

Refugee Council's newest work has been in supporting newly-arrived Afghans who been brought to the UK since August 2021, helping them to secure stable housing and integration support.

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### Introduction and background

This briefing focuses specifically on policy relating to refugees and people seeking asylum in the bill, although the scope of the Nationality and Borders Bill is much wider. The bill itself is a 'skeleton' piece of legislation in that it gives wide-ranging powers in a number of areas, but does not mandate those, nor does it specify full detail.

That detail will be set out later in guidance and implementation, but peers should be seeking to scrutinise it as much as possible in the course of Committee. To that end, this briefing includes a number of specific questions for the Minister that seek to better understand how the bill will work in practice, and points to relevant amendments.

In the spring of 2021, the Government made a wide range of commitments to reform the asylum system through its [New Plan for Immigration \(NPI\)](#). Since then it has claimed a mandate for these policies, even though the majority of responses to the consultation on the NPI were against the Government plans, and none of these commitments were outlined in the 2019 Conservative manifesto.

During the passage of the bill in the House of Commons, Government stated that that these reforms were about saving lives and breaking the economic model of people smugglers. However, these claims have not been supported by evidence, nor do they properly take into account key context and detail about the current asylum system.

In particular, peers should be cognisant of the small scale of asylum applications in this country, and how and why people come to the UK to seek protection. This context is important for understanding what these changes will mean in practice, as well as how they affect the UK's overall commitment to refugee protection and its treatment of individual refugees.

In total, the UK receives a much lower number of asylum applications than other comparable countries in Europe. The latest published figures show that the UK 37,562 applications in the year to September 2021,<sup>i</sup> which is the fifth highest total number in Europe, and the 17<sup>th</sup> highest in terms of per head of population.

In the year ending June 2021, the last for which there is cross-European data, more than double that amount of claims was made in France (87,180). Furthermore, the UK's figure was much lower, even as a proportion of the population, than in a larger country like Germany, which had the most claims in the EU (113,625 claims).

Even much smaller countries like Spain (67, 405 claims) saw a higher number of asylum claims than were made in the UK.<sup>ii</sup> These numbers are also only a very small proportion of those who have been forced from their homes globally, where there are close to 80 million displaced people, including 26 million refugees.

Every asylum application is a person or family seeking international protection and deserves a fair hearing. Claiming asylum is a legitimate thing to do, no matter how someone arrives in the UK. The international norm, as set out in the 1951 Refugee Convention, is to accept asylum applications regardless of the mode of arrival, and it is how many millions are able to claim asylum around the world each year.

International refugee law recognises that people will have to arrive in countries irregularly in order to make a claim for asylum. Nowhere in international law is there a rule around people needing to seek protection in the 'first safe country' in which they arrive, something that would clearly undermine responsibility sharing across nations.

At points, the Government has sought to suggest that those crossing the Channel in small boats are not doing so legitimately to make a protection claim, but because they are economic migrants. Analysis by the Refugee Council of those making that journey in the year to June 2021 has shown that 91% of people came from just ten countries where human rights abuses and persecution are common.

These include Afghanistan, Iran, Syria, Iraq, Sudan, Eritrea and Yemen.<sup>iii</sup> For many of these nationals, there is no current legal refugee resettlement route to the UK. Overall, the majority of people from these countries are eventually recognised as refugees, showing that the UK's asylum system understands them to be in need of international protection.

The Government has framed its new Nationality and Borders Bill as a package of measures that seeks to undermine the operations of people smuggling networks and prevent people from entering the UK who have no right to be here, while extending the safe and regular routes by which refugees are able to reach safety.

Unfortunately, the actual effects of the bill in its current form will be to punish refugees who have been recognised as such under international law, and it will actually reduce safe and regular routes to the UK as refugee family reunion rights become more limited.

There is an understandable and widespread concern for the safety of refugees crossing the English Channel on small boats, but these measures will offer no solution to this issue, nor any greater protection for those making the crossing. Reducing the rights that refugees have if they arrive in the UK irregularly (such as by boat or in lorries) will not reduce the numbers fleeing war and persecution, nor will it make their travel routes any safer.

There is no evidence from anywhere in the world that reducing the rights of refugees in a particular country will stop them from making journeys to seek safety. What the bill does mean is that many thousands of refugees who come to the UK each year will not be offered a clear route to settlement in the UK, but will be living in a temporary situation, unable to properly recover from their experiences or build for their futures.

This precarious existence will be cemented by the fact that refugees arriving irregularly will be unable to be reunited with their family members, even though we know that to be a key measure to aid integration.

The bill also proposes that refugees arriving in this way will be housed in accommodation centres, rather than in regular housing in the community, as has been the model to date. This is despite the many problems that refugees have faced in places like the Napier military barracks, including a lack of access to legal support and other services.

## **Key measures**

This bill brings forward a wide range of reforms, not all of which can be covered in this briefing. Below sets out some key measures affecting the asylum system, though changes to areas such as supporting evidence, appeals, and priority removal notices will be covered by other organisations such as Amnesty International and Women for Refugee Women.

Although covered in this briefing, for greater detail on the proposed measures proposed relating to age assessments of unaccompanied children (part 4 of the bill), you can read the Second Reading briefing from the Refugee and Migrant Children's Consortium [here](#). For greater detail on changes to refugee family reunion, please see the Families Together briefing [here](#).

## **Clause 11: Differential treatment of refugees**

The cornerstone of the bill is the principle of differential treatment, which has been described by UNHCR as inconsistent with the UK's obligations under the Refugee Convention.<sup>iv</sup>

The provisions in the clause will affect the rights and entitlements of refugees, dependant on how they arrive in the UK. People who have not travelled 'directly' from a country or territory where their life or freedom is threatened, and/or have not made an asylum claim without delay, but who are recognised as refugees under international law, will be classified as a 'Group 2 refugee'.

This will affect a large number of people who currently claim asylum, for example those who enter the UK without a valid visa, as is an accepted norm for people seeking protection across the world.

At present refugees coming through the asylum system are given five years' leave and then the right to apply for Indefinite Leave to Remain, but this will not apply to Group 2 refugees.

Group 2 refugees will not have an automatic right to settle, instead receiving up to 30 months of leave, and individuals will be regularly reassessed for removal from the UK at the end of each period of leave. We understand

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that they will only be able to apply to settle permanently after ten years. They will also have limited family reunion rights and more limited access to financial support.

This central proposal, set out in clause 11 of the bill, completely undermines the principle of asylum protection in the UK and runs counter to one of the basic tenets of the 1951 Refugee Convention – that someone’s mode of arrival should have no influence on whether they have a right to make an asylum claim, or whether they are later recognised as a refugee.

The Refugee Convention protects refugees from being punished for entering a country without prior permission e.g. through clandestine means or using false documents. It also confirms that states with refugees in their territory should provide ‘the same treatment with respect to public relief and assistance as is accorded to their nationals.’<sup>iv</sup>

By stating that clause 11 will reduce irregular arrivals, the Government also completely misunderstands how and why refugees flee their homes. When fleeing persecution, people will use any means to get to safety, including irregular journeys. The vast majority of the world’s refugees have found safety in this way.

#### **Relevant amendments:**

- Oppose stand part
- Probing amendment on vulnerable groups and the need to claim ‘without delay’
- Refugees, protected characteristics, and ‘good cause’ for unlawful entry or presence

#### **Questions for the Minister:**

1. Given the huge concerns voiced by UNHCR and the Joint Committee on Human Rights about the compatibility of clause 11 with the Refugee Convention, when will the Government publish its legal advice stating that this part is fully compliant with our obligations under the Convention?
2. As clause 11 will require the Home Office to routinely and more regularly reassess group 2 refugees and their right to remain in the UK every two and a half years, can the Minister say what cost estimate has been attached to this, and when will the full economic impact assessment of the bill be published?
3. Government has insisted that any reduced access to refugee family reunion for group 2 refugees will protect their rights under article 8 – the right to private and family life. In practice, this is a relatively weak protection in the UK, so can the Minister explain which family members refugees will be able to reunite with, whether this will be an automatic right, and whether there will be a fee attached to this route?
4. Clause 11 gives powers to impose NRPF conditions on the leave of a group 2 refugee. Can the Minister explain how many people the Government expects this to affect, and what process will be in place to get this condition removed?

### **Clause 12: Accommodation centres**

The bill includes new powers to create ‘accommodation centres’ to hold people who are at different stages in the asylum process, or who have ‘inadmissible’ claims, although more detail about the criteria for these centres is still needed.

The use of large-scale accommodation – such as military barracks - to hold people in the asylum system has come under increased scrutiny and criticism as its use increased throughout the COVID-19 pandemic.<sup>vi</sup> Stakeholders, including the Home Affairs Select Committee, have repeatedly shown that care of individuals has been poor within these facilities, and people in the asylum system have struggled to access legal advice and support services.

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Individuals have often had very little information about the status of their asylum claims, leading to poor mental health and general distress.

Organisations like Doctors of the World have expressed concern about access to healthcare in these settings; as they are commonly in remote areas, this kind of support becomes more difficult. Currently, Government has failed to explain how it will secure the health and wellbeing of those housed in these centres, despite the fact those entering asylum system are more likely to suffer poor physical and mental health.

Proposals to extend these forms of accommodation are ill-thought out and dangerous, and undermine the UK's duties to support and protect those making asylum claims. International examples of the use of 'congregated settings', including in the Republic of Ireland, have shown that this kind of accommodation is completely inappropriate for housing those seeking asylum. Any moves to further 'securitise' these settings, for example by locking people in overnight, would be an even more egregious violation of norms that have existed for many years in the UK asylum system.

The current dispersal system, whereby people seeking asylum live in regular housing in the community, is much better for supporting future integration and ensuring that people seeking asylum are able to access services they need. The disruption and cost associated with establishing new reception centres cannot be justified, when set against their potential harm and the lack of evidence that they result in better outcomes for people seeking asylum.

#### **Relevant amendments:**

- Probing amendment to limit accommodation centre capacity to 100 residents
- Probing amendment limiting who can be accommodated in these centres, including women, children and vulnerable groups
- Probing amendment limiting the maximum stay to 90 days (instead of 6 months)
- Probing amendment ensuring any children accommodated in centres can access mainstream education, as current prevented under the Nationality, Immigration and Asylum Act 2002.

#### **Questions for the Minister:**

1. Previous uses of large-scale accommodation to house people in the asylum system has attracted widespread local, national, and regional opposition. How will Government be attaining local consent for an accommodation centre in a particular area?
2. Given that in current centres such as Napier barracks, vulnerable people are routinely being housed in contravention to Home Office guidance, what assurances can the Minister give that in the expansion of accommodation centres, more robust screening and protections will be in place?
3. Who does the Government intend to house in accommodation centres? If women and children will not be held, why is that not in the legislation?
4. What is the cost associated with the establishment of new accommodation centres?

#### **Clauses 14-16: Inadmissibility of asylum claims**

Since 31<sup>st</sup> December 2020, a new Immigration Rule has been in place that means the UK Government can class someone's asylum claim as inadmissible if they have travelled through, or have a connection to, what is deemed a 'third safe country'.<sup>vii</sup> The new rules also give the Home Office the power to remove people seeking asylum to a safe country that agrees to receive them, even if they have never been there or have any connections to it.

Under current practice, if someone has not been removed from the UK after six months, as currently set out in guidance, their asylum claim will be heard here. At present, the UK has no bilateral removal agreements with other 'safe third countries', so the result has been to add months to the waiting period for those seeking to make an asylum claim, increasing the record-high backlog on asylum claims.<sup>viii</sup>

The bill puts this rule in primary legislation, but a new Government amendment at Report Stage in the House of Commons also removed the obligation to hear a claim after a 'reasonable time' (which had been the six months in practice). This means that as the bill is currently written, there will potentially be no route into the asylum system for those who are deemed inadmissible, essentially blocking them from seeking protection and leaving this group of vulnerable people in limbo.

Moreover, with regards to 'inadmissibility', it should be made clear that there is no obligation in international law on people to make an asylum claim in the 'first safe country' in which they arrive. Refugees are often trying to seek protection in the UK for a range of reasons, including because family members live here, or because they speak English, or they feel a connection to the country as people from former British colonies.

An approach of 'first safe country' also sends a dangerous message to countries with far larger refugee populations, legitimising the avoidance of international responsibilities and potentially endangering the lives of thousands. It suggests that support for refugees should only fall on a small number of poorer countries, which already host 90% of those forcibly displaced.<sup>ix</sup>

The UK currently has not negotiated any removal agreements with countries like France that would allow them to remove people who arrive irregularly. In that context, the 'inadmissibility' proposals place certain people in ongoing limbo, unable to claim asylum but remaining in the UK.

#### **Relevant amendments:**

- Oppose stand part

#### **Questions for the Minister:**

1. Can the Government give a date by which it expects to have any new returns agreements with European countries, and at what point will it secure an agreement covering the whole of the EU?
2. The changes in the bill mean that someone with an inadmissible claim has no backstop date after which they will enter the UK asylum system. Can the Minister give reassurances that people won't be left in limbo indefinitely, and when will they enter the asylum system?
3. What assessment has been made about the extra cost associated with housing people with inadmissible claims for significant periods of time before they enter the UK asylum system?

### **Clause 28 and schedule 3: Offshore processing of asylum claims**

Clause 28 relates to Schedule 3 of the bill amends previous legislation to allow the UK to process asylum claims made in the UK in 'offshore' locations, a policy based on the model used in Australia where those arriving by boat were then housed in detention centres in Papua New Guinea while their claims were heard.

If enacted, this approach would signal a deeply worrying departure from the UK's previous approach of giving people who seek protection a fair hearing on British soil. The Australian model resulted in a well-documented human rights crisis in relation to their asylum system with individuals experiencing immense suffering. Suicidal thoughts and poor

mental health were common amongst detainees, adults and children experienced abuses including sexual assault, and there were several deaths.

Offshore processing did not lead to a reduction in those arriving by boat in Australia, which was only achieved through boat pushbacks that have alarming implications for the safety of those at sea, and are certainly extremely dangerous for small boats in the English Channel. The policy has also cost billions of dollars to implement. For more information, parliamentarians should examine work by the Kaldor Centre in Australia on this issue.<sup>x</sup>

Sending people seeking asylum offshore (most likely to less developed countries) undermines the refugee convention by shifting the UK's obligations elsewhere, setting a dangerous precedent, which if other developed countries followed, would see the majority of people seeking asylum being sent to countries that have far less resources and infrastructure to support them.

**Relevant amendments:**

- Oppose stand part

**Questions for the Minister:**

1. The use of offshore detention in the Australian asylum system resulted in widespread human rights abuses. What protections is the Government putting in place to ensure that this will not be repeated under UK plans?
2. What estimate has the Government made of the cost of implementing offshore processing?
3. In the Commons debates, the Minister confirmed that unaccompanied children will not have their claims processed offshore. Can the Government confirm whether this will also be the case for children who are part of family units, and will the Government amend the legislation so the protection for children is on the face of the bill?

**Clause 39: Criminalisation of people who enter the UK irregularly**

The bill (clause 39) includes criminal offences for knowingly arriving or entering the UK without leave or a valid entry clearance – with a potential four-year prison sentence. Currently people arriving in the UK to claim asylum are not routinely charged with 'entering illegally' (the current offence) but would now be more punitively criminalised.

This proposal is deeply inhumane, and criminalises people who are seeking the protection of the UK. Rightfully there was international outrage when the USA, in recent years, started more forcefully criminalising those seeking asylum, imprisoning adults and separating them from their children, who were then moved into foster care. Any approach that has those implications would deeply damage the UK's standing in the world.

Moreover, criminalising vulnerable people in this way is deeply costly and resource-intensive; those arriving will not currently be able to be removed (because those removal agreements with the rest of Europe do not exist), and so would still be present in the UK – just at great cost moving through the courts and prison systems. Refugee Council analysis has suggested that full criminalisation of those seeking asylum could cost up to £412 million each year.<sup>xi</sup>

**Relevant amendments:**

- Joint Committee on Human Rights recommendation that 'arrival' without a valid entry clearance should not be an offence
- Joint Committee on Human Rights recommendation that a statutory defence based on Article 31 of the Refugee Convention should be extended to offences of illegal entry

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## Questions for the Minister:

1. During Committee in the House of Commons, the Minister suggested that this measure was unlikely to be applied to people seeking asylum. If this is the case, why can't the Government include an exemption in the bill, and what other safeguards is it considering to ensure seeking protection is not criminalised?
2. What cost estimate has the Government attached to clause 39?
3. How does the Government intend to apply this measure to families, and will it result in children removed from their parents and raised in the UK social care system?

## Clauses 48-56: Age assessments

Over many decades working with unaccompanied children seeking asylum in the UK, Refugee Council has repeatedly seen children incorrectly identified as adults. This has led to vulnerable children being housed with adults, and losing access to schooling, social care, and other support. Our Age Disputes Project works with hundreds of young people every year to challenge and overturn these incorrect decisions.

The Government's new age assessments proposals are likely to increase this problem, as they increase the evidentiary burden, remove key safeguards for young people, and introduce new age assessment methods which are widely considered unreliable for deciding a young person's age. To date, these proposals have had inadequate scrutiny because these new clauses were introduced late by Government at Committee Stage in the House of Commons.

Clause 48 proposes that any individual for whom there is "insufficient evidence to be sure of their age" has their age disputed. This would replace the higher bar set out in current statutory guidance from the Department for Education which makes clear that local authority age assessments "should only be carried out where there is reason to doubt that the individual is the age they claim" and "should not be a routine part of a local authority's assessment of unaccompanied or trafficked children". This new evidentiary threshold could see more children subject to unnecessary age assessments.

Currently local authority social workers have the main responsibility for assessing the age of unaccompanied children in the asylum system, by conducting assessments by interview, when they see fit. Yet clauses 48(2), 49 and 52 give the Home Secretary broad powers to designate *who* can undertake age assessments and to compel local authorities to assess the age of a child and hand over evidence to immigration officials, undermining their independence (local authorities do not currently have to conduct a stand-alone age assessment if they are satisfied that the claimant is a child).

Case law has determined that where there is doubt, an age-disputed applicant should be treated as a child pending resolution of the dispute, as a necessary safeguard. It is widely understood that age determination is an inexact science; that visual assessments are unreliable, and that benefit of the doubt must be afforded to ensure that children are not mistakenly treated as adults.

Clause 51 enables new 'scientific' methods of assessing the age of an unaccompanied child, including 'examining and measuring parts of a person's body' and 'the analysis of saliva, cell or other samples taken from a person'. Determining a person's age is a notoriously difficult process, and there is no fully objective way to do so. 'Scientific methods' are unproven, and professional bodies like the British Dental Association do not believe that methods like dental x-rays, can ever accurately tell you someone's age.



Although under the new plans a young person will have to consent to any such method, the bill explicitly states that a decision-maker should consider the credibility of a young person to be compromised if they refuse to assent to a 'scientific' method. The proposals therefore seek to acquire consent via a threat, and put vulnerable and traumatised young people in a terrible position.

#### **Relevant amendments:**

- Still to be tabled, but focused on scientific methods, independence of social workers, and evidentiary threshold

#### **Questions for the Minister:**

1. What is the government's reasoning for changing the evidentiary threshold for age assessments that is already set out in statutory guidance?
2. Does the Minister accept that social workers are best placed to conduct age assessments and that local authorities should be able to carry out their child protection work independent of the Home Office?
3. The Minister confirmed in Committee stage that the Government will determine that any scientific method "is appropriate for assessing a person's age" and "comply with all relevant regulatory frameworks in relation to the scientific methods chosen". Given this statement, will Government put a commitment to obtain written approval from the relevant medical bodies on the face of the Bill?

### **Safe and legal routes**

As part of its New Plan for Immigration, the Government has been keen to emphasise its desire to increase safe and regular routes under which refugees can arrive directly and safely in the UK. However, the bill does not introduce any new legal route of this kind, nor does it increase the numbers already coming via existing resettlement schemes.

In August, following the UK evacuation from Afghanistan, the Government did commit to resettling 'up to 20,000' Afghan refugees to the UK, via its new Afghan Citizens Resettlement Scheme, with 5,000 in the first year. However, five months later, much of the detail is still to be confirmed. The Government launched the scheme in January 2021, and suggested that most of the places for the first year would be filled by those already in the UK after being evacuated following the fall of Kabul in August 2021. The scheme will resettle people from neighbouring countries and also directly from Afghanistan, but the details and timescale of this latter pathway are still unclear.

A key issue for those already in the UK is the lack of family reunion routes for relatives to join them. We know that many people in Afghanistan with family links in the UK are desperate to seek safety here, but are unable to do so. The scheme's lack of family reunion routes also highlights the limitations of the UK's refugee family reunion rules for all refugees.

A further concern is that the important focus on Afghanistan will affect resettlement from other regions and conflicts. In recent years, the UK had been resettling approximately 5,000 refugees each year, the majority through its Syria-focused Vulnerable Person's Resettlement Scheme which ended in 2021. Sadly, resettlement numbers have severely dropped in the last year. The UK only resettled 1,171 refugees in the year to September 2021, a fall of 46% on the previous year.

This drop of resettlement capacity is worrying, particularly in the context where refugee resettlement dropped to a twenty-year low as a result of the pandemic, and where some countries such as USA, Canada, and Norway increased their resettlement targets for 2021/22 to make up for the shortfall in 2020. To put our current record in context, the USA will have a resettlement cap of 125,000 for 2022 and Canada has a target of 35,000 in 2022.

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If the UK Government is serious about refugee resettlement, and about ensuring that the UK is once again a leader in this area, it should commit to resettling 10,000 refugees each year, on an ongoing basis. That target is realistic and achievable, and having a target would drive performance and make the scheme accountable. It would help local authorities and other key stakeholders plan, with a precise idea of how many will be supported in coming years.

Measures in the bill will also reduce another major safe and legal route – that of refugee family reunion. Although Government has repeatedly promoted the importance of family reunion, and noted that it has supported 35,000 people in the last five years to arrive in the UK through this route, refugee family reunion will now be further limited for Group 2 refugees. Refugee Council estimates that up to 17,500 women and children could be prevented from reuniting with loved ones in the next five years under this clause.<sup>xii</sup> The bill does not set out detail on how it will be limited, and urgent clarity is needed on this. In the Australian model, when restrictions were introduced, it meant these refugees could never be reunited with family members.

Refugee family reunion is a key measure to support integration, as refugees are better able to make links in the community, look to the future, and be supported when they are with their family. Without it, family members in other parts of the world are actually likely to take more dangerous journeys in order to join relatives, as happened when the policy introduced in Australia.<sup>xiii</sup>

#### Relevant amendments:

- Resettlement target of 10,000 refugees per year
- Probing the reduction of family reunion rights under clause 11
- Extension of current refugee family reunion rules to allow adult dependent children to join their parents in the UK, and unaccompanied for children here to bring close family members

#### Questions for the Minister:

1. Given that Government has a numerical target to resettle 20,000 Afghans to the UK, why will you not commit to a target for refugees from other countries, where need is equally high?
2. The New Plan for Immigration stated the Government's intention to expand safe and legal routes. To that end, will the Minister consider an annual resettlement quota of 10,000 as a means of fulfilling that ambition?

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<sup>i</sup> <https://www.gov.uk/government/statistics/immigration-statistics-year-ending-september-2021/how-many-people-do-we-grant-asylum-or-protection-to>

<sup>ii</sup> <https://www.unhcr.org/uk/asylum-in-the-uk.html>

<sup>iii</sup> <https://www.refugeecouncil.org.uk/latest/news/new-refugee-council-analysis-shows-most-people-arriving-by-small-boats-across-the-channel-are-likely-be-fleeing-persecution/>

<sup>iv</sup> <https://www.unhcr.org/61e7f9b44>

<sup>v</sup> See article 23 – Public relief: <https://www.ohchr.org/en/professionalinterest/pages/statusofrefugees.aspx>

<sup>vi</sup> For example, see <https://www.independent.co.uk/news/uk/home-news/asylum-seekers-military-barracks-home-office-b1862538.html>

<sup>vii</sup> <https://www.gov.uk/government/publications/statement-of-changes-to-the-immigration-rules-hc-1043-10-december-2020>

<sup>viii</sup> <https://media.refugeecouncil.org.uk/wp-content/uploads/2021/07/01191305/Living-in-Limbo-A-decade-of-delays-in-the-UK-Asylum-system-July-2021.pdf>

<sup>ix</sup> <https://www.unhcr.org/uk/news/latest/2021/10/615dbdb34/political-needed-safeguard-824-million-displaced-unhcr-protection-chief.html>

<sup>x</sup> <https://www.ein.org.uk/news/academic-report-finds-australian-model-offshore-processing-asylum-seekers-which-uk-proposes>

<sup>xi</sup> <https://www.refugeecouncil.org.uk/latest/news/proposals-to-further-criminalise-and-imprison-people-seeking-asylum-to-cost-most-than-400m-per-year/>

<sup>xii</sup> *New Plan for Immigration Impact Analysis*, Refugee Council, June 2021 p. 5

<sup>xiii</sup> See <https://www.unhcr.org/61e7f9b44>, p.8, paragraph 24.