

Dame Diana Johnson MP
Chair, Home Affairs Select Committee
House of Commons
London
SW1A 0AA

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Sent by email

Dear Dame Diana,

We are writing to the Home Affairs Select Committee on behalf of London Councils, the cross-party collective body of London's 32 boroughs and the City of London.

We are writing to highlight to the Committee the policy issues in relation to asylum and migration that, in the view of London local government, are of most pressing importance and would be valuable for the Committee to scrutinise.

Home Office officials are aware of our concerns and are engaged with borough representatives in the task of improving the system; however, we remain concerned by the scale and nature of the issues and challenges they create for boroughs.

London boroughs provide a crucial safety net for asylum seekers and people seeking refuge and resettlement in the capital, including Ukrainians fleeing war and Afghan evacuees. From co-ordinating health and care provision and enrolling children in schools, to supporting refugees to access English lessons and employment, we are proud to support this vital work.

We would like to invite committee members to see first-hand the work boroughs are doing to support asylum seekers and refugees in London. This work is vital for our asylum system to work, but without government funding, is unsustainable. We would be happy to arrange a visit that would be near to Parliament and at a time which suits you. Please do let us know in your response to this letter if this is of interest.

Refugee Homelessness

We are deeply concerned by the growing number of newly recognised refugees leaving Home Office accommodation and sleeping rough in London following the implementation of the Streamlined Asylum Process (SAP).

According to research from London Councils, across London 846 homelessness presentations were made in October from refugees and asylum-seekers evicted from Home Office accommodation, and in November, 212 people in London were identified as sleeping rough after leaving Home Office Accommodation. We also know that 19% of [Severe Weather Emergency Protocol \(SWEP\)](#) placements in January 2024 were from people leaving Home Office accommodation.

Without intervention or changes in policy, we believe the number of newly recognised refugees sleeping rough is only going to increase. The rise in refugee homelessness has placed enormous pressure on already stretched local authority housing departments and represents a substantial new and unfunded burden. It is concerning that the Home Office

have publicly stated that they do not record homelessness data for people leaving the asylum system and suggests the Home Office is not monitoring the impact of its policies.

Asylum seekers receiving positive decisions have just 28 days' notice to leave their accommodation, to claim universal credit, find employment and a new place to live. Asylum seekers cannot work or access government funding employability support, including ESOL, until they receive their decision. Such a policy makes it incredibly difficult for newly-recognised refugees to establish themselves in such a short space of time and invariably leaves it to local authorities to pick up the pieces.

This lack of support and resultant homelessness and rough sleeping increases costs across public services in addition to the human cost to asylum seekers and refugees. Local authorities are well placed and already provide outreach and wraparound support to asylum seekers to help prevent homelessness, but there has been no funding for councils supporting people in contingency hotels since 1 April 2023, nor is there any funding for boroughs to provide wraparound support once someone receives their asylum decision. London Councils is calling for a 56 day move on period for newly recognised refugees, in line with the Homelessness Reduction Act. This time period would also permit meaningful wraparound support for councils to assess individuals' physical and mental health needs and to ensure application and receipt of Universal Credit, which can take up to 6 weeks.

The challenges associated with the Streamlined Asylum Process sit in the larger context of homelessness in London. Around 170,000 Londoners – equivalent to one in 50 residents – are homeless and living in temporary accommodation arranged by their local borough. Homelessness amongst Ukrainian arrivals is a particular issue; between February 2022 and December 2023, 1890 Ukrainians presented as homelessness in London, primarily due to the breakdown of sponsorship or family visa arrangements. London Councils is calling on the government to boost Homelessness Prevention Grant funding and increase discretionary housing payments to address these pressures.

Procurement and Accommodation Standards

Procurement of asylum accommodation in London remains challenging, with the issue of contingency and dispersed accommodation being procured with little or no notice or engagement with boroughs. Currently, we are particularly concerned with the impact of hotel closures; the Home Office has written to London local authorities to inform them of planned hotel closures up until April. These closures have been primarily enabled by the movement of asylum seekers across the Home Office estate. There have been significant challenges with, in some cases, very short notice and poor communication and disruption of access to services and education. The movement of asylum seekers between hotels at short notice, results in shunting pressures from one borough to another and heightens risks to the wellbeing and safeguarding of hotel residents.

London Councils is keen to encourage more sustainable and holistic approaches to accommodation for asylum seekers going forward. The Local Authority Housing Fund, which provides capital funding for securing properties for Afghan and Ukrainian arrivals is an incredibly valuable and welcome approach to increasing the overall stock of housing and we would strongly welcome similar approaches to asylum accommodation.

London local authorities have also raised consistent concerns around the standards in accommodation procured– including issues such as food quality, overcrowding, mould, damp and poor ventilation. This increases the risks to health and emotional wellbeing to vulnerable people. We would welcome an examination of the capacity and outcomes of the Home Office Assurance team and recommend that the committee engages with the ICIBI following their investigations this month into accommodation standards in properties across London.

Unaccompanied Asylum Seeking Children

There are significant pressures on the ability of local authorities to support unaccompanied asylum seeking children (UASC). London supports around a third of UASC in the country, with a number of boroughs near or above the agreed threshold for receiving referrals through the National Transfer System.

Boroughs have raised concerns about the ability of the National Transfer System to respond to need, with a delays in transfers of care. In the Summer of 2023, the urgent need to transfer UASC from Kent following the High Court ruling on hotel accommodation for UASC demonstrated that the NTS is not able to cope with spikes in demand. London Boroughs are also particularly concerned about the mis-age assessments of UASC at the border, and the safeguarding risks associated with children being incorrectly placed in the adult estate.

Safeguarding and Information Sharing

Local authority asylum teams have worked to identify to asylum seekers with vulnerabilities and provide proactive early intervention, including through outreach teams visiting accommodation to identify needs. There are serious concerns about a systematic lack of referrals to local authority safeguarding teams when concerns are identified. We are also calling for greater data sharing with local authorities about those in asylum accommodation to enable local authorities to deliver early interventions to prevent safeguarding issues arising in the first place. London boroughs are especially concerned about safeguarding risks in relation to hotel maximisation, the movement of vulnerable people across the asylum estate, and rough sleeping linked to the Streamlined Asylum Process. Currently, local authorities receive no data from the Home Office or its contractors (e.g. gender, age, nationality, language) for people living in Dispersed Accommodation. This makes fulfilling statutory duties deeply challenging and increases the risks associated with safeguarding concerns.

The Consultation on Safe and Legal Routes

In December 2023, the Home Office conducted a consultation directly with local authorities on the implementation of the cap on Safe and Legal routes, requiring local authorities to provide their capacity to resettle arrivals under specified schemes. London boroughs are committed to supporting refugee resettlement, but the approach of the Safe and Legal routes consultation was not conducive to effective planning for resettlement support. In particular, the short time frame for consultation, the lack of guidance and information from the Home Office, and the uncertainties facing local authorities on a number of areas of refugee and asylum policy (such as the future of the Homes for Ukraine Scheme and plans for asylum dispersal) made it very difficult for local authorities to provide meaningful responses. The serious pressures in relation to the asylum system and homelessness place local authorities in a very difficult position, and these issues need to be addressed to enable local authorities to effectively play their role in resettlement. In this context, the decision by the Home Office to record any non-response from a local authority as a 0 for the sake of the consultation is troubling, as this is unlikely to be a fair representation of that local authority's position.

We are calling on the Home Office to take a more joined up holistic, approach to planning for both refugee resettlement and asylum pressures in the future, which focuses on the needs of individuals and communities, rather than silos based on route of arrival. The current work on safe and legal routes needs to be situated in the context of broader pressures including asylum dispersal, and the Home Office should work collaboratively with local authorities to plan in a place based way. This requires a consistent, joined up and equitable approach to funding for refugees and asylum.

London Councils can provide additional detail and evidence on the issues raised in this letter if this is useful to the Committee, and we are keen to support your work going forward.

In conclusion, we ask that the Committee raise the following concerns with Home Office ministers and officials:

- The growing number of newly recognised refugees leaving Home Office accommodation and sleeping rough, and how the Home Office can work to mitigate the impact of the cessations policy.
- Given the vital work local authorities are doing to support asylum seekers and refugees, why there has been no funding for councils supporting people in contingency hotels since 1 April 2023, nor is there any funding for boroughs to provide wraparound support once someone receives their asylum decision.
- What is the strategy to manage the closure of hotels to ensure that adequate notice is given to residents and councils and to ensure that people are being placed into suitable accommodation?
- Standards in accommodation procured by the Home Office including issues such as food quality, overcrowding, mould, damp and poor ventilation.
- The impact of Home Office policies (including SAP, hotel maximisation and age assessments) on the safeguarding of children and vulnerable adults.
- Why local authorities receive no data from the Home Office or its contractors (e.g. gender, age, nationality, language) for people living in Dispersed Accommodation. This makes fulfilling statutory duties deeply challenging and increases the risks associated with safeguarding concerns.
- The way in which the Home Office conducted the consultation with local authorities on the implementation of the cap on Safe and Legal routes, including the short time frame given for local authorities to respond, and the decision to record any non-response from a local authority as a 0, given this is unlikely to be a fair representation of that local authority's position.

Yours sincerely,

Cllr Grace Williams,

London Councils' Lead Member
for Communities (Labour)



Cllr Gareth Roberts

London Councils' Vice-Chair
(Liberal Democrat)



Cllr Elizabeth Campbell

London Councils' Vice-Chair
(Conservative)

