

Written evidence submitted by Richard Machin, Senior Lecturer, Social Work and Health, at Nottingham Trent University

This written evidence is submitted by Richard Machin, Senior Lecturer, Social Work and Health, at Nottingham Trent University. He specialises in social welfare law and practice and previously managed a local government welfare rights and money advice service. This evidence builds upon his policy analysis of Homes for Ukraine, an accompanying policy briefing, and overview of the emerging homelessness issues for displaced Ukrainians. The analysis has been completed in consultation with welfare rights professionals completing case work with Homes for Ukraine guests.

1. Background

The war in Ukraine has created an unprecedented European refugee crisis. By 30 June 2023, over 179,00 Ukrainians have arrived in the UK under one of the government's visa schemes.

The Homes for Ukraine scheme was quickly established and rolled out on 14 March 2022. Approved Homes for Ukraine guests are granted three years' leave to remain and immediate rights to welfare benefits, work and study. It should be acknowledged that the scope of these provisions is more comprehensive than for many other groups moving to the UK and more generous than the standard asylum system. However, this written evidence demonstrates that there are significant areas of challenge relating to access to the welfare benefits system, safeguarding, inconsistencies between the Homes for Ukraine and Ukraine Family Scheme, homelessness, funding, and long-term resettlement.

2. Concerns

The main issues of concern relate to social security, housing and inconsistencies between Homes for Ukraine and the Homes for Ukraine Scheme. These concerns are detailed below.

2.1 Social security

- The digitalised Universal Credit claims and process is difficult for many Ukrainians to navigate without specialist support. Accessing Department for Work and Pensions telephone systems is challenging because of language issues. The requirement for Universal Credit claimants to have a bank account can result in long delays in payment.
- A dependency on Universal Credit is often seen as Ukrainians rely on insecure and precarious employment and qualifications from Ukraine are not always recognised in the UK.
- Although Homes for Ukraine guests have immediate access to disability benefits (Employment Support Allowance, Personal Independence Payment, Attendance Allowance), the claims system is complex. Claim forms are complex, supporting evidence is needed to accompany the claim and most applicants need to attend a medical. Experience of working with other newly arrive groups indicates a high rate of refusal for disability benefits and this is now emerging for Homes for Ukraine guests. Specialist support is needed with the claims and, if necessary, appeals process.

- There can be delays in the issuing of National Insurance numbers which, in turn, delays claims/payment of social security benefits.
- The value of any property in Ukraine should be disregarded in the calculation of mean-tested benefit claims in the UK; this is not always happening.
- In some circumstances 16 and 17 years olds can claim Universal Credit. This should be the case for unaccompanied 16 and 17 year olds arriving from Ukraine, but there are examples of the Department for Work and Pensions assessing a Homes for Ukraine host as a parent.
- The state retirement age in Ukraine is 60 but this does not align with UK social security rules. This means people in this age bracket who were retired in Ukraine are required to claim Universal Credit and meet the full level of claimant commitment.

2.2 Housing

- A significant homeless problem is emerging where Homes for Ukraine arrangements come to an end. As of September 2023, 7,990 households were assessed as being owed a prevention or relief duty, including 5,350 households with children. The true extent of the homelessness problem will be significantly higher as these figures are based on a return of 86% of English-only authorities.
- Homelessness is normally associated with the following three factors:
 - **A breakdown in hosting arrangements:** many Homes for Ukraine placements end at the minimum 6-month period creating a housing need for the guest. Some hosts have acknowledged that they did not fully appreciate the practical and emotional burdens of providing accommodation. The number of people offering accommodation through the scheme has fallen sharply since the early period of the conflict. For some hosts the cost-of-living crisis is an influencing factor as there are costs associated with accommodating a guest which may not be covered by the thank-you payment.
 - **Problems accessing long-term housing, particularly in the private-rented sector:** supply and affordability issues in the private rented sector can be acutely experienced by Homes for Ukraine guests. It is not uncommon for private landlords to request 6-12 months rent in advance, a substantial deposit and guarantor. A lack of credit history and references can exacerbate problems. In the short-term accessing social housing is often not an option due to pressures in this sector.
 - **Inconsistent and insufficient support provided to Homes for Ukraine guests to secure long-term accommodation:** many hosts live in more affluent areas and when a Homes for Ukraine arrangement ends the guest is unable to find affordable housing in the same area. This can be particularly problematic if work and school places have been secured. Some voluntary sector groups and charities have had to scale back housing and integration support as the conflict persists and local authority funding has halved in the second year of the scheme (from an initial figure of £10,500 for each arrival).
- The UN Refugee Agency and the Charity Commission have raised concerns about safeguarding and exploitation related to Homes for Ukraine guests. This is often related to problems with the matching process and the issuing of visas by the Home Office before local authorities can complete safeguarding checks.

- Local authorities have reported that the Department for Levelling Up, Housing and Communities (DLUHC) sponsor registration form lacks an appropriate data validation protocol meaning much time/resource is spent undertaking erroneous accommodation/welfare checks.

2.3 Inconsistencies between Homes for Ukraine and the Ukraine Family Scheme

- Regulations provide that the income of Homes for Ukraine hosts is not affected by the income/circumstances of the guest(s) that they accommodate. There is no corresponding provision in the rules for the Ukraine Family Scheme; hosting family members can experience significant decreases in their income as a result of accommodating family members who are considered to be non-dependants.
- There is no payment for Ukraine Family scheme hosts to reflect the payments to Home for Ukraine hosts (£350/month, increasing to £500/month if the arrangement lasts longer than 12 months).
- When a Ukraine Family Scheme arrangement ends there is no provision for a guest to be rematched under the Homes for Ukraine scheme.
- Unlike the Homes for Ukraine Scheme, no local authority funding is provided for the Ukraine Family Scheme, similarly no data is made available for this scheme, or assistance provided with community integration. Under Homes for Ukraine, local authorities were initially provided with a per-person grant of £10,500 to support community integration (reducing to £5,900 for arrivals after January 2023). The Ukraine education tariff allocates £3,000/child for early years, £6,580 for primary and £8,755 for secondary. Local authorities receive no funding to support Ukrainians under the Ukraine Family scheme.
- Accommodation provided through the Ukraine Family Scheme is not subject to local authority pre-arrival checks, or monitoring for welfare and safeguarding issues, as is the case with Homes for Ukraine.

3. Recommendations

- Parity between the Homes for Ukraine and Ukraine Family Scheme should be introduced including payments to Ukraine Family Scheme hosts and regulations which ensure that these hosts do not experience a reduction in their benefit entitlement based on their guest's circumstances.
- Ukraine Family Scheme guests should be able to switch to the Homes for Ukraine scheme if provision breaks down.
- A review of the Homes for Ukraine sponsorship form and process should be undertaken to ensure appropriate data validation and safeguarding checks are completed.
- The government should publish revised guidance on the Homes for Ukraine matching process. During the COVID-19 the Local Government Association produced a set of best practice principles for effective partnership between local authorities and the voluntary sector. These should be considered as guiding principles for partnership work on the Homes for Ukraine scheme.

- The government should commit to a full review of the current three year right to remain requirements afforded through the Homes for Ukraine scheme. This should be concluded no later than two years after the onset of the war (February 2024).
- A cross-departmental response is needed to respond to the emerging homelessness problems for Homes for Ukraine guests. Additional funding is required for local authority and voluntary sector advice agencies to provide tailored housing advice. DLUHC should develop a centralised best practice hub promoting best practice housing advice (such as rent deposit schemes and incentives for private landlords to rent to Ukrainians).
- A review of the guidance on discretionary housing support and payment schemes is needed to ensure it is appropriate for displaced Ukrainians.
- A review of the homelessness code of guidance is required to ensure it is appropriate for displaced Ukrainians.

4. Monitoring and research

- An inquiry into the operation of the emergency social security regulations for displaced Ukrainians should be conducted by the Social Security Advisory Committee and/or the Work and Pensions Committee.
- Homelessness management information on displaced Ukrainians should be provided as a required Official Statistics or National Statistics release. Data should be provided by local authorities from all four UK nations.
- The Home Office and DLUHC should commission research to investigate the reasons for the break down in Homes for Ukraine placements, reflecting on both the host and guest experience. This should consider the host experience of community resettlement schemes and the emotional, financial and practical burdens that this imposes. From a guest perspective financial, cultural, and safeguarding issues should be explored, and the integration support which is needed to secure employment and long-term housing.
- Research should be commissioned by the Home Office and DLUHC with local authorities from all four nations to explore the adequacy and administration of funding for the Homes for Ukraine scheme. This would ascertain the actual local authority spend to support the integration of displaced Ukrainians and consider the overall levels of funding provided, the education tariff, 2023/4 new burdens funding, and the functioning of safeguarding arrangements.

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