

**Written evidence submitted by the No Accommodation Network (NACCOM)**  
**(COR0190)**

[Note: This evidence has been redacted by the Committee. Text in square brackets has been inserted where text has been redacted.]

1. How can the Home Office and its major contractors are working together to ensure the safe and effective operation of contracted services is maintained, particularly where these services affect vulnerable people?

**Background to NACCOM**

2. NACCOM is the No Accommodation Network a UK wide network of 120 member organisations and individuals working collectively to end destitution amongst people seeking asylum, refugees and migrants with no recourse to public funds (NRPF). Of our 120 members, 62 are providing direct accommodation to destitute people through hosting, housing, and night shelter provision. We were set up in 2006 and became a registered charity in 2015. Our staff team of 6 support our members to increase the number of bed spaces they offer and become more sustainable through providing networking opportunities, advice, guidance, training and events. We gather evidence from our members to publish research reports and campaign for policy changes to reduce destitution.
3. Our member organisations are predominantly grass roots charitable organisations providing essential services including accommodation to people who would otherwise be street homeless. [Last year](#), over 3200 people were accommodated by members, whilst at least 1200 further people who needed accommodation were turned away due to lack of capacity.

**Summary**

4. We recognise that we are in the midst of an acute crisis and the people who we work with are not alone in being vulnerable to COVID-19. However, they are currently unable to protect themselves or their communities because of restrictions on accessing public funds and a wider hostile environment regime that prioritises immigration enforcement over public health measures. The impact of this dysfunctional system is that we are now not well prepared to face the huge challenges that COVID-19 brings and that people are placed in grave danger. It is essential that the Home Office sets out smart policies to protect people that are commensurate with the wider risk to public health. There are immediate and achievable steps to reduce destitution and homelessness amongst people with insecure migration status that can be taken by the Home Office to save lives and protect wellbeing.

**Recognition of action and recommendation for further changes**

5. Some sensible measures have already been taken that have prevented people from becoming street homeless during this public health emergency. A key example is the suspension of evictions from Home Office asylum accommodation until June 2020. However, whilst these actions are welcomed, immediate work is needed to plan for the end of this initial lockdown period to prevent street homelessness and protect people who would be vulnerable to a second wave of COVID-19.
6. **Recommendation:** A taskforce should be set up between Local Authorities, the Home Office, MHCLG and third sector partners to plan transitional routes for everyone from emergency

accommodation into secure housing. This will need to include necessary and achievable changes to the NRPF regime.

7. Furthermore, additional action is urgently needed for people who are outside of the asylum system, including those who have been refused asylum or who are otherwise undocumented. People who are destitute because they are not able to access public funds or the right to work often experience street homelessness. In 2018-19, 56% of the people whose situation was known before accessing NACCOM member's accommodation were street homeless. The remaining people were at immediate risk of street homelessness, whilst 5% of people had just been discharged from NHS care. For people supported by NACCOM members, experiences of street homelessness are shaped by restrictions on accessing mainstream support and funds, an inability to access healthcare and experiences of racial harassment. These factors result in varied and hidden experiences of street homelessness and rough sleeping.
8. As of 09/04/2020, all NACCOM hosting projects have stopped taking new referrals, all Night Shelters have ceased operations and most housing projects are at capacity. It is clear that the voluntary sector cannot support the needs of this population alone and that people will be left street homeless without practical support from Local Authorities and policy change from the Home Office.

#### **Second wave of people presenting as destitute and street homeless**

9. We are concerned that Local Authorities are starting to see a 'second wave' of people presenting as destitute due to their situations changing as a result of COVID-19. Last year, 39% of people self-reported as 'sofa surfing' before being accommodated by NACCOM members organisations. People without recourse to public funds are left reliant on last minute offers of friends (typically different people each night), mixed with sleeping outside when they are unable to find a place to stay for the night. Despite regularly sleeping outside, very few clients will be found sleeping in the same spots on the street and due to restrictions on public funds are unlikely to have previously engaged with rough sleeping outreach services. Prior to the pandemic some people previously stayed with acquaintances in Home Office asylum support accommodation, but this violates the terms of their friends housing and is now in direct contravention of government regulations and guidance on COVID-19.
10. People who sleep outside will often use abandoned buildings and will move regularly. People report that they often face racial harassment from other rough sleepers or the public and so do not use spaces visited by outreach teams. Many clients stay awake during the night, [walking or using night buses](#) and then use day centres as spaces to sleep during the day. These centres are now closed due to COVID-19. Moving between multiple sites is a clear risk to wider public health and makes it impossible for individuals to follow COVID-19 health guidelines. These patterns of sofa surfing and rough sleeping place people both at risk of contracting and of transmitting the Coronavirus.
11. The only way to prevent this public health risk is by enabling everyone to access support and accommodation during the pandemic period. We are at a juncture where the Home Office could work together with other Government departments, Local Authorities and third sector partners to prevent harm. The alternative of delayed or uncoordinated action could have grave consequences.

12. **Recommendation:** We are calling on the Home Office to enable people with insecure migration statuses to access public funds. This would include people who have been refused asylum and other people who are undocumented and would allow people to access immediate support and accommodation, protecting wider public health.
13. **How is Home Office delay impacting Local Authority responses to people presenting as homeless who have no recourse to public funds and those who have been refused asylum?**
14. People who are experiencing street homelessness need immediate support in order to protect individual and public health and to be able to follow government guidance on social distancing and in some cases shielding protection. The [Minister for Homelessness recognised this in a letter to all Local Authority leaders](#) dated 26<sup>th</sup> March 2020. In an unprecedented move, he stated that there would be a national strategy to 'protect as many homeless people as we can from COVID-19' through Local Authority provision. The Minister detailed basic principles which included to 'focus on people who are, or at risk of, sleeping rough and those who are in accommodation where it is difficult to self-isolate'. This explicitly included people who cannot usually access public funds (NRPF).
15. At present there is no clear steer from National Government as to what alternative funds can be utilized for people with. The existing legislation does not make it clear that they can provide for people with NRPF in these circumstances. As such there has been a very mixed response from Local Authorities across the UK to people with NRPF. Some are turning people who have NRPF away, whereas others are providing some support. Worryingly, in the past week, we have seen some local councils rescinding previous offers of accommodation as they believe that a lack of further guidance on NRPF from the Home Office or MHCLG is a sign that pre COVID-19 rules have not changed and should still be applied in full.
16. **Recommendation:** We are calling on Local Authorities to ensure that everyone, regardless of immigration status, can access self-contained accommodation, financial support and are able to self-isolate safely whether they are symptomatic or not.
17. [A letter drafted by Project 17 and Public Interest law Centre](#) which we signed went to all Local Authorities included this ask. However, we recognize that in order for all Local Authorities to fully support people with NRPF, further guidance is needed from central government and that policy change to NRPF rules is required. Without this, people will continue to experience street homelessness and to be placed in unnecessary risk.
18. **How could Home Office policy change support Local Authorities to protect those in need and public health?**

*Middlesbrough Council – using the Severe Weather Emergency Protocol (SWEP)*

19. In Middlesbrough when the COVID -19 crisis started local members Open Doors North East (ODNE) approached the homelessness team at Middlesbrough Council to see what support they could offer for people who had no recourse to public funds and had nowhere to stay. The Council acted quickly using a type of Severe Weather Emergency Protocol (SWEP) to immediately accommodate people who are refused asylum and evicted from Home Office accommodation and any others who present as homeless even if they have no recourse to public funds. At least 6 people were accommodated in bed and breakfast type accommodation. The Council does not provide people with subsistence support and destitution payments are being made by ODNE.

20. More recently, the Local Homelessness team then received verbal guidance from MHCLG that NRPF still stood and that there was no way to fund people with NRPF in accommodation. Middlesbrough Council initially issued eviction notices to everyone with NRPF between the 15<sup>th</sup>-17<sup>th</sup> April. However, following advocacy from ODNE they rescinded these notices until further guidance from central government is issued and have ceased taking new referrals for people with NRPF. These leaves people without access to accommodation and has created a huge amount of personal anxiety for the 6 people currently accommodated.

Glasgow Council – Using Hotel rooms organised and supported by Glasgow Night shelter

21. Glasgow Night Shelter for Destitute Asylum Seekers (GNS) provides emergency overnight accommodation to destitute people who have previously claimed asylum. The guests of GNS share a room and do not have access to showers, so in its current set-up GNS had no way to follow social distancing guidance to safeguard everyone's health and wellbeing.
22. Recognising the risk posed to both guests, staff and volunteers, GNS liaised with local hotels and eventually secured hotel rooms at a reduced fixed price per week, room only. Glasgow City Health and Social Care Partnership (GCHSCP) agreed to cover the costs of accommodation only for 24 men for an initial 7 days, and to review every 7 days. They did not agree to fund beds for those on GNS's waiting list.
23. 30 men have now moved into individual hotel rooms and GNS who were previously open from 8pm - 9am are now offering a 24-hour service. The extra costs incurred in staffing this service, the rooms not funded by the GCHSCP, and providing 3 individually packaged meals a day to the guests is not being covered by local authorities but by GNS's own funds and additional donations. GNS continue to receive referrals for people seeking accommodation during this crisis, especially those who have been living in precarious situations. They are working hard to find the funds to accommodate them and are liaising daily with the Scottish Government.

Nottingham City Council

24. NACCOM member Host Nottingham recognised the public health danger of people with NRPF who are street homeless. They have consistently approached Nottingham City Council evidencing the need for accommodation and support to prevent people contracting and transmitting COVID-19. Following the lead of other NACCOM partners, Host Nottingham successfully brokered a partnership with the local University for use of their student halls to accommodate people who are destitute with NRPF. Initially, NCC agreed to fund a limited amount of bed spaces. However, following verbal communication between NCC and MHCLG, they rescinded this offer and unfortunately NCC have not accommodated anyone, stating that NRPF rules still stand.

**Case study:** *Destitute person who has had asylum claim refused given Local Authority accommodation but left without any financial support*

*A [age redacted] man with underlying health conditions was given a Local Authority funded hotel room at the beginning of April 2020 following the letter from Luke Hall. He now has a self-contained room with a toilet and a meal delivered by a charity partner in the evening. He does not receive any subsistence funding from the Local Authority and cannot access mainstream benefits. He feels safe in his new room and can use the WIFI to access support services, but there is no breakfast or lunch provided. He is being given £40 per month by a local charity, which he must use to pay for these expenses.*

*“I was homeless, moving between different places. Sometimes I sleep outside and sometimes at my friend’s house. It’s a very small house, the problem is, the wife of my friend was very terrible. She didn’t want me there, she tells me I make noise and I should go outside. She follows me into the toilet, she demanded to know who speak with me, she embarrassed me a lot. She wants me to clean [the house] every day and tells me I can only go to the house at certain times. I have no freedom when I stay there. It’s like abuse, I don’t refuse, but I try to go out to local charities to get space.*

*When Corona started my friend said I couldn’t stay anymore. Luckily, a charity helped me contact the Council. The homelessness worker was kind, he asked me some questions about immigration status, but he said “Don’t worry, we will help everyone regardless this time, but in future you will need to have status to get help”*

*I’m worried about contacting the Home Office, maybe it is a trap? But I have started an application for Section 4 because I want to try and use this quiet time to try and ask for help.*

*Now, though, everything happened so quickly and my worry is that all my things are scattered. My tent is in one place. I left my bag with all my important documents in a shop. Now the shop has closed and the man has disappeared. I don’t know where he lives. I can’t proceed with my applications to the Home Office.*

*Why is it that it takes until Coronavirus for people like me are remembered and to be given a place to stay? Why should we wait for corona? Now, it’s almost like we are praying for corona to continue, because at*

### **Destitution and homelessness for those currently eligible for asylum support**

25. The Home Office has announced in the last weeks the suspension of evictions of people from asylum support accommodation and for people who have been refused asylum whilst on Section 95 support , the automatic transition onto Section 4 support. These announcements have been slow and often following leeway given by frontline accommodation providers on the ground. Communication around changes has been confusing and reliant on charity partners to distribute to clients in accommodation. A key example is the announcement that those who had received positive decisions would be able to stay in asylum accommodation, but that their subsistence support would still cease after 28-days. Charity partners were informed that people could individually apply for extensions of support and as a result limited and valuable resources were put into individual applications to ensure continued support. On the 15.04.20, the Red Cross received confirmation that asylum support would continue until the first payment of Universal Credit was made. However, this has still not been widely communicated to refugees themselves.

### **Case study: [Aged over 60] woman left without subsistence support**

*A [aged over 60] lady with mobility problems, [a medical condition] and other underlying health problems, was in Home Office Section 4 asylum support accommodation living in a shared house with other people some on section 95 support. Her Section 4 support was refused at the end of February 2020, and she was due for eviction in the last week of March 2020. The contracted housing providers agreed to let her stay in the accommodation, but her subsistence support was stopped and she is relying*

26. Recommendation: All applicants for section 95, section 4 or schedule 10 support should be automatically and appropriately accommodated within the Home Office asylum support system while applications are being processed. Any decision that someone is not, in fact, eligible for support should not be actioned until after the current health emergency has passed.

#### **Home Office Section 4 support**

27. All people who are destitute and have been refused asylum are now technically entitled to Section 4 support accommodation and a pre-paid card for specific shops. Due to the COVID-19 risk, there is limited possibility of being able to travel to return to one's country of origin. The Asylum Support Appeals Project set this out clearly in [their factsheet on asylum support and Covid -19](#):

28. The Home Office decision making on Section 4 applications is well evidenced to be slow and inaccurate. [Research by NACCOM and Refugee Action](#) in 2019 looking at over 200 cases showed that on average people waited at least 14 days for a decision on their asylum support application. This does not include the time it then took for people to be given accommodation. The Asylum Support Appeals Project latest published statistics from 2019 show that 65% of appeals against refusals of Home Office asylum support are successfully overturned at appeal. These delays were exacerbated by the transition to the new Migrant Help contract in September 2019 and at present we are still hearing of people who have submitted Section 4 applications months ago still waiting for a decision.

#### ***Case study: Pregnant woman left without any financial income***

*A NACCOM member assisted a woman who was [heavily] pregnant to apply for Section 4 support. They began the application in the middle of February. [Date redacted] March, the Home Office requested copies of bank statements before she was refused support on [date redacted] – [shortly] before the Minister for Homelessness letter to Local Authority leaders requesting help to 'get everybody inside' over the weekend.*

*She was left destitute and [heavily] pregnant, unable to access support services as they were shutting down due to lock down. Rather than an individual approach being taken, she was forced to submit an appeal for Section 4 support.*

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