



## PPR's input to the draft Refugee Integration Strategy

21 Feb 2022

PPR welcomes the chance to inform the Executive Office's draft 'Refugee Integration Strategy.' Its 'high level outcomes', that refugees and asylum seekers *are valued and respected; are safe and feel secure; exercise their rights and responsibilities; and are supported to achieve their full potential*, are commendable.

But the 'associated actions' fall short, not least because, based on evidence collected amongst the groups we support -- some published in our submissions to the UN Special Rapporteur on the Right to Adequate Housing on [discrimination in housing](#) (April 2021) and to the NI Affairs Committee on the [situation of ethnic minorities](#) (May 2021) -- the strategy ignores key international human rights standards as well as the daily reality faced by refugees and asylum seekers here.

One glaring omission is the fact that **over the last year in NI, increasing numbers of newly arrived asylum seekers are quietly being housed in private hotels** under the oversight of Mears Group, in conditions which effectively prevent any integration whatsoever. (According to the Home Office [fact sheet](#) introducing this practice, local authorities were involved in identifying this so-called "suitable temporary accommodation", so it is unclear why the draft integration strategy neglects to mention it.) In the hotels, people's contact with local communities is extremely limited and reports indicate that some of their key rights as individuals and families are infringed:

- in some cases people are under curfew in the hotels, restricting their mobility;
- their primary school age children -- in an apparent denial of the universal right to free primary education<sup>1</sup> -- are not enrolled with their peers in local schools, receiving the same education as others of their age group and integrating into daily school life and routines. This would appear to constitute a prima facie violation of the right to education, which sets out that the provision of free primary education is the minimum essential element which a state must provide, without discrimination. Provision of teaching within the hotels, while undoubtedly well-motivated, is likely not to meet the human rights standard of 'acceptability' which requires relevant, culturally appropriate and good quality education.
- families are living in single rooms, with no facilities to cook culturally appropriate food for themselves or lead a normal family life. This impacts the right to food<sup>2</sup> of

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<sup>1</sup> International Covenant on Economic, Social and Cultural Rights, Article 13, (2<sup>a</sup>),

<sup>2</sup> Ibid, Article 11 (1)

hundreds of families, failing to meet critical human rights standards in relation to the accessibility, quality and cultural acceptability of food.<sup>3</sup>

- in another denial of their rights there is no outdoor or indoor play area available to children, hampering their physical and mental development. This is contrary to the right to play set out in the UN Convention on the Rights of the Child<sup>4</sup> which recognises the following factors, among others, as integral to enabling the right to play: freedom from stress; freedom from social exclusion, prejudice or discrimination; an environment secure from social harm or violence; an environment sufficiently free from waste, pollution, traffic and other physical hazards to allow them to circulate freely and safely within their local neighbourhood; accessible space and time for play, free from adult control and management; space and opportunities to play outdoors unaccompanied in a diverse and challenging physical environment, with easy access to supportive adults, when necessary; opportunities to experience, interact with and play in natural environments and the animal world; opportunities to explore and understand the cultural and artistic heritage of their community, participate in, create and shape it;
- people reportedly receive around one fifth of the already shockingly inadequate £39.63 / week subsistence allowance from the Home Office, meaning that they cannot meet their basic needs. Parents are denied the ability to provide for their children and meet their developmental needs. Others reportedly receive no allowance at all. This is contrary to the right to an adequate standard of living set out in Article 11 of the International Covenant on Economic, Social and Cultural Rights.
- Women need to ask for sanitary products at the reception which is culturally inappropriate and a source of real distress for them.

There has been no public consultation on this new practice of hotel accommodation, and no presentation by authorities here of the policy, legal or contractual framework underpinning it. (This contrasts with Scotland, which has seen [increased public concern](#) following tragic [incidents of violence](#) amongst asylum seekers held in inappropriate hotel accommodation, and where the Cabinet Secretary for Social Justice, Housing and Local Government [has repeatedly written](#) to the Home Secretary to query the increased use of this accommodation.)

Hotel accommodation is apparently being referred to as a temporary measure for new arrivals, but in some cases people have already spent up to four months in these conditions, with no end date in sight. With regard to this **use of hotels as temporary accommodation**, the draft integration strategy must

1. name this new practice and clarify its legal and contractual parameters, including when its use will come to an end and proposals for how to accommodate the people living in hotels on a permanent basis;

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<sup>3</sup> UN Committee on Economic, Social and Cultural Rights, General Comment 12 on the right to adequate food, see especially paragraphs 7-13.

<sup>4</sup> United Nations Convention on the Rights of the Child, Article 31

2. in the interest of integration, set and enforce strict time limits on its use, of two weeks maximum
3. immediately exempt families with children from this policy, in light of best practice in the UK and the ROI around use of B&Bs and hotels as temporary accommodation
4. immediately establish mechanisms for public oversight of living conditions, lengths of stay and related matters
5. in the wake of [reported incidents of 'Britain First'](#) presence in and around the hotels, deploy sufficient security resources to guarantee the safety of asylum seekers placed there
6. set up community support programming to counteract the harmful impact of seclusion in these hotel settings on people's long-term integration
7. ensure that practices harmful to rights, identified above are ceased and replaced with right-respecting alternatives.

In terms of **access to education**, the draft does not acknowledge blockages faced by key groups including (as above) asylum seeking children assigned to hotels and denied a place in local schools. Another impacted group is young refugees aged 16 and above who are trying to transition to higher education. Information from the latter group indicates that they can frequently find themselves facing barriers accessing courses, for instance in getting their status recognised and approved. These obstacles may not be deliberate policy, but rather due to education authorities' lack of awareness and willingness to accommodate the particular circumstances of this group. These blockages set back children and young people's efforts to integrate and contribute fully to the community around them.

In addition to the vague references to education and training it contains, the strategy must

8. commit to ensuring all asylum-seeking children under 18 can fully access their right to education by
  - a. guaranteeing their timely enrolment in local schools
  - b. once enrolled, refraining from moving them away from their school's area except -- in cases of need -- between academic years
9. investigate the causes of blockages to education faced by older refugee and asylum seeker children; make findings public; and commit to a plan of work for addressing these.

With regard to **housing**, the integration strategy fails to acknowledge the harm caused to the many refugee and asylum-seeking families assigned to inadequate, substandard accommodation that does not meet their needs, damages their physical and mental health and hinders their capacity for integration with their local community, and whose calls for redress have repeatedly been ignored or denied. Instead it refers only to 'building on positive engagement' with other authorities -- effectively denying the failings in the system.

The Asylum Accommodation and Support Contracts are held by Mears Group and Migrant Help and overseen by the Northern Ireland Strategic Migration Partnership, of which the Executive Office is a member; housing complaints are addressed to Mears. Most refugees are

housed in private rented accommodation, some of which are part of Homecare Housing's 'portfolio' of properties; complaints are sent to the Housing Executive, the public body ultimately responsible. Freedom of Information requests by PPR have [revealed](#) that refugees are most frequently housed in areas of high social housing need in Belfast, where there is already enormous pressure on local housing supply.

Throughout 2021 PPR operated online housing clinics for people in need. Many of them were asylum seeker or refugee families who had spent months or even years using every available channel to try to get solutions to the problems affecting their physical and mental health and hampering their ability to integrate with the community, to little or no avail. PPR assisted scores of people in detailing and submitting complaints to their relevant housing authority.

In line with the requirements of the right to housing under the International Covenant of Economic, Social and Cultural Rights, for both asylum seekers and refugees, the integration strategy must commit to:

10. carrying out a full social services assessment for everyone upon entry into the system, to ensure that the accommodation they are allocated meets the specific needs of the individuals involved and provides them proximity to the services they need to access
11. immediately moving asylum seekers and refugees out of substandard or inadequate housing that damages their physical and mental health and therefore their capacity to integrate
12. ensuring that no new families are allocated the same substandard housing, without all Decent Homes Standard and other issues first being rectified
13. enabling an effective immediate response (by the PSNI, community partnership networks or other structures) to all reports of [hate incidents](#), and in particular to repeat incidents
14. guaranteeing the Housing Executive the resources it needs to respond promptly to requests to move due to intimidation or hate incidents.
15. more effectively monitoring the way the AASC contracts held by Mears and Migrant Help are working for the people dependent on them, and ensuring effective remedy in cases of substandard accommodation, inappropriate accommodation, intimidation and abuse or other issues

In the area of **destitution**, the strategy includes a positive aim to *"develop a pathway out of destitution for refugees and asylum seekers facing destitution and those who have No Recourse to Public Funds (NRPF) status"*. Enforced destitution is deliberately built in to the Home Office's asylum system through the default No Recourse to Public Funds designation given asylum seekers whose initial claim has been refused. (In 2020/21, [half of those who](#)

[appealed a refusal were later granted asylum](#) - after first enduring months or more of street homelessness, privation and extreme vulnerability to exploitation and abuse.)

In a potentially positive development for people with a NRPF designation, the Housing Executive's recent draft [Ending Homelessness Together 2022-27](#) strategy gives duty bearers the scope to shape a more humane future for this group by committing to

*explore alternative routes with the Department for Communities and the Department of Health through which to provide accommodation and support to people with no recourse to public funds when the current arrangements as part of the COVID-19 response end. (p. 39)*

This is a potentially hopeful example of cross-ministerial collaboration to build on the lessons of the Covid-19 pandemic to tackle obvious objective need. It is unclear whether this is what is meant by the phrasing of the draft integration strategy; for the sake of clarity and policy coherence, the Integration Strategy should

16. Build on joint work undertaken by PPR, Choice Housing Association, CFNI and East Belfast Mission which has developed a pilot model to provide accommodation and support for asylum seekers with No Recourse to Public Funds. This could include identification of other possible partners, as well as commitment by the Minister for Communities to using specific Housing Association properties for people with No Recourse to Public Funds.
17. include a commitment to alternative routes to provide accommodation and support to people with NRPF, in line with the new draft Homelessness Strategy
18. use all available housing units (including social housing not accessible to NI nationals because of security of tenure issues) to meet housing need, particularly amongst the NRPF group
19. explicitly address food poverty amongst asylum seekers and refugees and propose measures to combat it
20. seek input from asylum seekers and refugees on practical measures -- such as provision of child care for Home Office interviews -- that will improve their ability to access support and services and facilitate their integration
21. a commitment from the Minister for Communities to declassify discretionary support funds as public funds.

Finally, while acknowledging

*the very real contributions many refugees and asylum seekers have made and continue to make to our society, across our public services, in our community sector and in the establishment of local businesses (p. 4)*

the draft does not reflect [growing public support](#) for **lifting the ban on asylum seekers working**. Both the Justice and Finance Ministers have also expressed support for exploring options in this area, so that people's skills are not wasted.

Currently asylum seekers are generally denied the right to work in the UK. If they have been waiting [longer than a year](#) for a decision on their claim they may apply to the Home Office for an exception. If this is granted, they may apply for positions in a limited list of specialist '[Shortage Occupation](#)' areas only<sup>5</sup>. They are [not allowed to be self-employed](#).

This work ban has been identified as one of the main impediments to full integration, in that it denies people's dignity and prevents them from providing for their families, participating in normal adult work life and contributing fully to their communities. The ban also increases their vulnerability to abuse and exploitation. In many cases it isolates people, damaging their self-image and ultimately, their mental and physical health. In early 2021 the Lift the Ban group supported by PPR developed an online survey for people to gauge the extent of the talents, skills, and professions amongst the asylum-seeking community in Northern Ireland that are effectively being wasted due to the work ban. The survey, translated into 5 languages, received [125 responses](#).

Prior to being forced to leave their country, more than four out of five people said they had been working, and of the fifth that hadn't been working many were under 18 when they left and had been in full time education. Nearly one in three had a university education or higher. The most frequently mentioned sector that people had worked in before coming to NI was health and social care: people were doctors, nurses and care workers, all extremely valuable skills that are needed in our communities. (Since then, reflecting labour needs linked to the pandemic, asylum seekers are now being [permitted](#) to work in [health care and in social care settings](#).) Prominent elements from [the NI hospitality sector](#) and other sectors facing labour shortages are calling for these workers to be permitted to contribute.

Given these factors, the integration strategy must

22. include as an action identifying routes into employment for both of these groups.

22. include as an action a review aimed at bringing practice here into line with that in a range of [EU countries](#) (Sweden allows asylum seekers to work immediately upon arrival, with no restrictions; in Portugal, asylum seekers whose claims pass the initial (one month) review stage are allowed to work while their claim is undergoing further deliberation; in Belgium, Denmark, Finland, Italy, Poland and Spain asylum seekers who are still awaiting a decision after six months may work without restrictions; and in [Ireland](#), asylum seekers may work after 9 months, in all sectors including self-employment, except for in the Civil Service, Defence and the Garda Síochána.)

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<sup>5</sup> Up until 2002, people seeking asylum could apply for permission to work in the UK if they had been waiting for an initial decision on their asylum claim for longer than six months. The Shortage Occupation List -- which restricts the right to work to people in designated professions only -- has been in place since 2010.