



CLILC • WLGA

Reducing Homelessness amongst Migrants, Refugees and Asylum Seekers

Good Practice Guide

Tai Pawb *for* Welsh Local Government Association



Welsh Local Government Association

The WLGA's primary purposes are to promote a better local government, its reputation and to support authorities in the development of policies and priorities which will improve public service and democracy.

It represents the 22 local authorities in Wales with the 3 fire and rescue authorities and 3 national park authorities as associate members.

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1. BACKGROUND AND METHODOLOGY

In 2019 four dispersal area local authorities (Cardiff, Swansea, Newport and Wrexham Councils) were provided with funding from Welsh Government through an EU Transition Homelessness Prevention Grant to increase their capacity to manage and respond to the potential impact of migration locally with a focus on housing support and specifically homelessness and homelessness prevention services. The context for this funding was the need for advice and assistance resulting from exiting the European Union.

As part of this work, Tai Pawb were commissioned by WLGA to develop a good practice guide. While aimed at dispersal area local authority homelessness services, the guide includes learning applicable to all local authorities in Wales. The purpose of this guide is to highlight some of the key challenges related to preventing and tackling homelessness amongst migrant populations and share good practice examples from Wales and other nations.

An initial scoping exercise carried out by Tai Pawb in partnership with the four local authorities identified the need to focus on the following cohorts:

- EU migrants
- Refugees
- People with no recourse to public funds (including failed asylum seekers)

The development of this guide consisted of:

- a scoping exercise carried out with the four local authorities
- interviews carried out with housing options managers and migration leads in the local authorities
- desktop research including access to websites and latest research available on homelessness and the above three cohorts
- knowledge gained from third sector through attendance at migration/sanctuary focused meetings and other work being carried out by Tai Pawb relating to temporary housing for refugees and COVID-19 impacts
- impact reports submitted by the above four local authorities reporting on work undertaken as a result of additional funding from Welsh Government EU Transition Homelessness Prevention Grant (as above)

2. EU MIGRANTS

2.1. Key Issues

Recent estimates¹ put the number of EU migrants in Wales at 79,100 (2.6% of the population). This means that Wales has a smaller share of migrants than almost any other part of the UK. The three EU countries where the highest number of EU migrants come from are Poland (18,000), Ireland (12,000) and Germany (11,000).

It is difficult to estimate the numbers of EU nationals who are homeless or have been threatened with homelessness in Wales. Data is not collected systematically on the national level although local authorities may collect their own data. This is certainly an issue worth addressing; this data is collected by the government in England.

Wales annual National Rough Sleeper Count which is undertaken over a two-week period collects nationality data of rough sleepers. The 2018 count identified 8 rough sleepers with a connection to Europe (2% of total rough sleepers). Cardiff Council Rough Sleepers Strategy² puts the number of EU rough sleepers in Cardiff in 2016 at 10. It is generally acknowledged that the rough sleeper counts usually present a limited picture of the actual rough sleeper numbers as they are carried out as snapshot counts. For example, the 2019 count identified only 176 rough sleepers in Wales, but the numbers of homeless people are much higher, as has been demonstrated by the fact that over 2,226 people have been temporarily housed under Covid-19 provisions³.

2.2. Issues identified by Welsh local authorities

Anecdotally, some local authorities have seen an increase in homelessness presentations from EU migrants following the EU referendum, others however were not able to confirm this.

In January 2020 Wrexham Council reported a dramatic increase in EU migrants threatened with homelessness and later evicted from private rented sector under Section 21 (so called no-fault eviction). The local authority's perception was that private landlords in the area were starting to perceive EU migrants as 'higher risk' tenants alongside people who are in receipt of benefits (some tenants reported that the landlord specified that the eviction was 'because they are migrants'). It is also possible that some of the negative media reporting

¹ <https://seneddresearch.blog/2017/06/29/safeguarding-the-position-of-eu-citizens-living-in-the-uk-and-uk-nationals-living-in-the-eu-what-does-it-mean-for-wales/>

² <https://www.cardiff.gov.uk/ENG/resident/Housing/Cardiff-Housing-Strategy/rough-sleeping-strategy/Pages/default.aspx>

³ <https://gov.wales/ad-hoc-statistical-requests-10-july-2020>

which followed the EU referendum might have influenced those landlords' actions. This trend has not been confirmed by the other local authorities.

Newport Council stated out of a total of 7113 individuals registering as homeless and/or on the housing register as of the 18/12/19, 566, or 8% are recorded as being EU nationals. Housing services also reported an anecdotal increase in the number of EU nationals presenting as homeless over the last 6 months. Supporting People services reported a total of 140 EU nationals receiving floating and drop in housing support via a Newport Mind Supporting People (SP) funded project since 2019. A further 55 people have been supported via other SP services. Newport noted that a significant proportion of people across all of these support services do not declare their nationality, making numbers a conservative estimate.

Cardiff Council highlighted that there are ongoing issues with homeless EU migrants being able to access housing benefit – the application process can take much longer due to the need to evidence residency rights and therefore recourse to public funds. This will particularly be the case for those migrants without Settled Status⁴. This can be a particular issue for the council's temporary accommodation providers for whom there is a risk of unpaid rents due to this issue.

Settled status entitles EU nationals to access to public funds. EU migrants who have been continually resident in the UK for less than 5 years may qualify for Pre-settled Status⁵. Individuals with Pre-settled Status are not automatically eligible for public funds⁶.

Cuts to local authority funding have meant that local enforcement teams have had limited resources to investigate any issues specific to migration although enforcement action will be taken as and when defaults are identified.

One of the biggest challenges identified by the local authorities was lack of awareness of tenancy rights amongst EU migrants. This often meant that migrants face homelessness due to illegal evictions or lived in unsuitable housing with no awareness of landlords' responsibilities, their rights and how issues can be tackled. There was also a perception amongst some local authorities that the EU referendum and the resulting changes introduced to immigration law meant that some EU migrants felt more vulnerable and were less likely to challenge the undermining of their rights in various spheres, including housing.

⁴ <https://homeofficemedia.blog.gov.uk/2020/07/02/media-factsheet-eu-settlement-scheme/>

⁵ <https://www.gov.uk/settled-status-eu-citizens-families/what-settled-and-presettled-status-means>

⁶ <https://www.housing-rights.info/brexit-news.php>

2.3. Other challenges identified in research

The above challenges partly reflect the key issues faced by EU homeless nationals and the homelessness services supporting these groups, as identified in research from across the UK. The most recent UK-wide research into the challenges linked to migrant homelessness conducted by Crisis⁷ was undertaken in 2019 and 2020. Below are challenges identified through the Crisis research and other reports.

- The scale of migrant homelessness has increased. 7 out of 10 Crisis survey respondents confirmed this
- Benefit and public funds entitlements and restrictions make it harder to both prevent and end migrants' homelessness. The rules governing EU nationals' entitlement to benefits and statutory homelessness services are complex and the support to which someone is entitled will vary depending on the basis on which they have a right to reside in the UK. This is in a way easier to determine for EU nationals with Settled Status (eligibility is the same as for UK nationals). For those with Pre-settled Status, eligibility for benefits and homelessness support is usually determined on the basis of habitual residency rights. These rights can be acquired through being a worker⁸, a family member of an EU national⁹ or via other routes, including self-sufficiency or studying¹⁰
- Crisis reported on the surge in EU nationals being denied access to benefits¹¹. At times, homeless individuals will be legally entitled to support, but sometimes lack the documentation needed to either prove eligibility or to apply for Settled Status because of unstable living arrangements. Concerns related to the implications of exiting the EU, future migration policy (leading to changes in rights and entitlements) and the implications for EU nationals are growing amongst homelessness providers
- Key reasons for EU migrant homelessness can be different for EU nationals than other homeless people identified by Crisis research are loss of income (often linked to insecure employment) and lack of access to financial support available to the general population, therefore homelessness support for EU migrants usually focuses on these two issues

⁷ <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/types-of-homelessness/a-home-for-all-understanding-migrant-homelessness-in-great-britain-2019/>

⁸ https://www.housing-rights.info/03_4_EEA_workers.php

⁹ https://www.housing-rights.info/03_6_EEA_family_members.php

¹⁰ https://www.housing-rights.info/03_5_Other_EEA_nationals.php

¹¹ <https://www.theguardian.com/society/2019/aug/05/surge-in-eu-citizens-unfairly-refused-access-to-universal-credit>

- Other reasons commonly identified in research are:
 - Job offers or support offers from family or friends already in the UK, that turn out, on arrival, to be short term or non-existent
 - Insecure or casual employment, low wages
 - Not enough contingency savings e.g. for a deposit or transport home and no support networks
 - Relationship breakdown in the UK or in country of origin
 - Domestic abuse: survivors' right to reside is sometimes linked to the right to reside of the abuser, and therefore they may need to make an application for Leave to Remain to avoid having insecure immigration status and no recourse to Public Funds – which will limit access to refuges or other support
 - Substance dependency or mental health issues
 - Casual or seasonal employment ends, along with any tied accommodation
 - Unscrupulous landlords e.g. over-charging, evicting illegally, not returning deposits
 - Loss of ID and lack of funds to renew ID
 - Employment abuses such as withholding of wages that remain unchallenged
 - Escape from trafficking and forced labour¹²
- Legal advice for migrants, at risk of or experiencing homelessness is paramount but has been severely affected by cuts to legal aid. Investing in and facilitating access to legal advice (including advice for migrant women experiencing domestic abuse) alongside any homelessness support is therefore important
- Whilst much research on EU homelessness stresses the difference between the causes of migrant homelessness and the general population, Crisis reports that the majority of homelessness support providers surveyed reported an increase in support needs which are also common for other groups, e.g. mental health or substance misuse issues. The difference for people from abroad is that their housing and homelessness challenges and associated problems can be exacerbated by insecure immigration status or forms of leave which limits their access to public funds or appropriate services

¹² <https://www.homeless.org.uk/sites/default/files/site-attachments/Supporting%20EEA%20Nationals%20guidance%20for%20homelessness%20services%20March2020.pdf>

2.4. Good practice examples and useful information

Key advice to Welsh Government, local authorities and homelessness providers in relation to preventing and reducing migrant homeless centers around the following themes:

- The Welsh Government should consider improved national homelessness data collection in relation to migrant communities including number of migrants supported who have No Recourse to Public Funds and those who are sleeping rough
- Local authorities should monitor for potential increased numbers of EU nationals and other migrants evicted, or served Section 21 notice from the private rented sector (as per increase in numbers indicated by one local authority above)
- Staff should have up to date knowledge of EU citizens' rights and entitlements to welfare support, homelessness and housing. This can be done through providing staff with information resources such as the NRPF network resources and partnering with third sector providers as well as regular training on migrants' rights and entitlements and no recourse to public funds policy
- It is important that staff know where to access help, advice and information on rights and entitlements or where to signpost individuals
- Local authorities should consider how to promote appropriate access to legal advice, given the recognised shortages; this specialism is practiced by 17% of law firms based in England, but just 4% of firms based in Wales¹³. Assisting migrants to regularise their immigration status (which may currently include ensuring applications for EU Settled Status are made or lifting of NRPF restrictions where appropriate) is key to preventing migrant homelessness. Staff need to bear in mind that immigration advice is regulated¹⁴. Although access to legal advice is limited, local authorities and homelessness support organisations could engage with refugee and asylum seekers' and migrant organisations and have a list of immigration advisors available to their staff going forward. Welsh Government has commissioned the [EUSS Wales advice service](#) for migrants, however this service might be time limited, therefore local arrangements around sustaining access to good advice in the future should be pursued. It is worth considering whether resources could be pooled and access to immigration advice could be sourced and commissioned jointly by Welsh local authorities for EU and non-EU migrants, refugees and asylum seekers, including people with NRPF. Given the context of exiting the EU and changes to immigration rules, provision, funding or facilitation of

¹³ <https://gov.wales/sites/default/files/publications/2019-10/the-legal-sector-in-wales-a-rapid-review.pdf>

¹⁴ <https://www.gov.uk/government/organisations/office-of-the-immigration-services-commissioner>

referrals to external immigration advice is becoming increasingly important to fully ensure EU nationals' rights and entitlements

The Housing Rights Info website is the most comprehensive and regularly updated source of information on housing, homelessness and welfare entitlements of EU migrants, non-EU migrants, refugees and asylum seekers across the UK - including dedicated Welsh pages. It is jointly published by [Chartered Institute of Housing](#) and [BME National](#) with financial support from [ARHAG Housing Association](#), [Innisfree and Tamil Housing Association](#). It is written by experts in the field of migrant homelessness and welfare entitlements. Material on Wales is prepared jointly with Shelter Cymru.

The website has separate pages for migrants and for housing and homelessness advisors. The website has separate pages focusing on:

- Refugees and asylum seekers
- EU workers and other EU nationals
- people with indefinite leave and people with limited leave
- European family members
- People fleeing domestic violence
- People with social care needs and
- People who are destitute

Housing Rights Info also provides [detailed information](#) on the EU Settlement Scheme and how it affects housing and benefits eligibility.

Homeless Link have developed a [useful guide](#) to homelessness and immigration advice which explains the importance of legal advice and signposts to key sources of advice for practitioners and migrants. This booklet is also relevant to other groups, such as destitute asylum seekers and refugees. Local immigration advice can also be sought through UK Government website.

Find out more [here](#)

In July 2019, the Welsh Government announced a package of free support to help EU citizens prepare for Brexit and continue to live and work in Wales. This package means people can get the help they need, including:

- Digital support with their Settled Status applications or help with basic queries about eligibility from Citizens Advice
- Advice on social welfare issues and workplace rights
- Free specialist immigration advice for people with complex needs, delivered by immigration law firm Newfield's Law

There are many organizations in Wales who are providing advice and support to EU citizens.

To co-ordinate the delivery of advice services in Wales, the Welsh Government has developed the EUSS Wales Co-ordination Group. This group brings together Newfield's Law and Citizens Advice with other organizations that are delivering their services in Wales.

Specialist, Welsh Government backed website has been developed to provide information on support and how it can be accessed. The website provides details of all providers of advice and support to EU citizens, including immigration advice.

Find out more [here](#)

- Due to the differences between EU migrants' routes into homelessness and those of general population, it is worth considering the extent to which homelessness assessments and housing plans reflect those differences. For example, to what extent homelessness assessments consider benefit entitlements based on immigration status, the extent to which they consider employment history to determine immigration status, does the applicant know where to access advice and support etc. Access to language support should also be promoted and utilized
- Some homeless EU migrants may be victims of violence or domestic abuse. Women from migrant, refugee and asylum seeker populations are particularly vulnerable due to vulnerabilities caused by systemic barriers, experiences in countries of origin and en-route to the UK and other factors. It is important to be aware of these experiences and vulnerabilities. The Wales Strategic Migration Partnership and Cardiff University carried out research into violence against migrant, asylum seeking and refugee women and it can be accessed [here](#). Research was also carried out by Data Cymru into how 'No Recourse to Public Funds' status affects those

experiencing gender based violence, domestic abuse and sexual violence in Wales, which can be accessed [here](#)

- Accessing healthcare may become an issue for some EU migrants following Brexit. Those lawfully living in Wales before 31 January 2020, can use the NHS in Wales, as they can now, until 31 June 2021. After that date EU citizens living in the UK must have registered and obtained settled or Pre-settled Status to be able to continue to live in the UK and access NHS services free of charge. More information on access to healthcare can be obtained from Welsh Government website [here](#)
- For some EU nationals, reconnection to their home country may be a plausible option. It is important that, before considering this option, other avenues of accessing support and housing in Wales are considered. Comprehensive and person-centered assessments focusing on the homeless person's assets and multiple routes out of homelessness are recommended before reconnection to the home country is considered

The Routes Home Service is a service supporting non-UK nationals sleeping rough in London which started in April 2016. The service is run by charity and housing association St Mungo's and commissioned by the Greater London Authority.

The service employs, dedicated Assessment and Reconnections workers who aim to support EU nationals sleeping rough in London who have need of specialist support, to explore their options away from the street including access to services in the UK and their country of origin. Routes Home also offer expert advice and signposting to referring agencies so they can better support the person to explore their options in the UK and abroad.

Recently, the service has expanded to include access to immigration advice for EU nationals sleeping rough or at risk of rough sleeping who require immigration advice to explore their options under the EU Settlement Scheme.

In addition, Routes Home offers support to non-EU nationals who require legal advice to resolve their immigration status, through a Resolution List service. Referrals for this service can be made by outreach teams. The immigration advice is provided by qualified immigration advisers through a subcontracting arrangement with an OISC registered provider.

The service has also developed good practice guidelines focusing both on homelessness support and reconnection considerations.

The guidelines provide advice on issues such as:

- Brexit and the EU Settlement Scheme
- Contact and assessment
- Making enquiries and checking information
- Working with families
- Overcoming barriers to returns to a home country
- Preparing for an EU reconnection
- Arranging and supporting journeys to EU countries
- After-care and follow up
- Supporting non-EU nationals with irregular migration status
- Planning EU reconnections during COVID-19 Pandemic

Find out more [here](#)

- Loss of employment or inability to find employment is one of the key reasons contributing to migrant homelessness. Support with employment is therefore one of the main routes out of poverty and homelessness for some EU migrants. Local authorities should consider their capacity to provide such support or refer people to services which can support EU migrants. Important aspects to consider here are:
 - Entitlement to work. EU nationals are entitled to work in the UK on the same basis as previously until June 2021. You can check employment rights on the UK government [website](#). [This website](#) also allows to check whether a document entitles an EU migrant to work. Since 2014, those EU nationals claiming in work benefits or signing on as unemployed after losing their job need to show that they were in work that was/is “genuine and effective”¹⁵
 - Significant number of EU migrants may be working through agencies and not be fully aware of their rights which can make them vulnerable and increase the risk of homelessness. TUC [produced a guide](#) on this topic for agency workers

¹⁵ https://www.homeless.org.uk/sites/default/files/site-attachments/Entitlements%20of%20EEA%20Nationals%20March%202018_0.pdf

Crisis delivered a pre-employment program for homeless migrants in London in 2012. [The Crisis Pre-employment Program](#) for EU nationals in London was set up in response to a dramatic increase in the proportion of CEE migrants within the street homeless population in London and the failure of existing services to provide them with adequate advice regarding their rights and entitlements in the UK. The program is based on the premise that paid employment offers an important route out of homelessness and potential destitution. It thus aims to support CEE migrants by improving the skills and employability of those who are homeless or at risk of homelessness in the capital.

The program offered tailored one-to-one support, delivered by job coaches, who typically meet with service users once or twice per week. It also facilitated access to a range of on-site training courses, and/or supported users to access training elsewhere as appropriate. Additional forms of support included a job club, mock interviews and financial assistance for travel, clothing or equipment necessary to enhance users' employability. Job coaches also regularly support users in areas that are not directly related to employment, such as facilitating access to housing or health services and/or assisting with welfare benefit applications (where applicable).

The program ran from October 2009 until September 2012, during which time it supported 398 service users. More than half of all service users were sleeping rough, and almost all others living in temporary or insecure housing (most commonly squats), at the point of recruitment. The vast majority were economically inactive, in that they were unemployed and not involved in training or education at that point. Self-reports of multiple vulnerabilities were relatively uncommon, but staff reported that a minority of CEE migrants were highly vulnerable, often because of alcohol misuse issues.

In total, 40% of service users acquired one or more jobs after becoming involved with the program.

- Homelessness and immigration restrictions will sometimes lead to vulnerable EU migrants being the target for traffickers. You can learn more about trafficking and forced labour from [here](#). There is also guidance on modern slavery, which is available from [here](#)
- Homeless link have produced a [useful guide](#) to EU employment rights with a focus on homeless migrants

Practice in Wales

Wrexham Council told us that they have developed good relationships and partnership working with BAWSO and local Citizens Advice. The local authority can refer EU migrants to these third sector organizations for additional advice and support relating to a variety of issues, including housing and support with registration for the EU Settlement Scheme.

Wrexham council also works closely with the Private Rented Landlords Forum. This includes raising awareness of migration issues to counteract negative stereotyping and the risk of evictions.

Cardiff Council's homelessness support for migrants

Additional funding from Welsh Government aimed at reducing homelessness amongst migrants was utilised by Cardiff Council to deliver additional training, advice and support for migrants. These activities included:

- Training 40 homelessness and housing staff on awareness of options, rights, eligibility and responsibilities amongst migrants to improve advice and referrals to appropriate support
- Additional 29 clients have been provided with advice and assistance to prevent homelessness and further 30 clients have received homelessness help and support including finding accommodation in the Private rented sector, help with bonds and rent in advance
- Council website has been updated and leaflets created with advice on housing options for migrants
- 109 individuals were helped with access to employment. Of these 23 were found employment and 86 had help to be more work-ready. Referrals were made for employment and training (where appropriate). Help was provided with how to look for work, training options and preparing for interviews as well as creating a CV
- Monitoring system has been put in place to help determine and monitor the level of need amongst migrants who are homeless or at risk of homelessness. Strategies have also been reviewed to include objectives relevant to preventing homelessness amongst migrants

Cardiff Council works closely with Salvation Army which provides multiple support services and accommodation for rough sleepers in the city. Amongst others, Salvation Army runs The Cardiff EEA Community Pathway Project. This project is designed for economically excluded individuals from the European Economic Area. It provides accommodation, support and guidance; help with life skills, community integration, advice on education, training and employability and chaplaincy services. Taking referrals from local outreach services, it also provides people with the opportunity to reconnect back to their home country or become self-sufficient and economically active within the UK. As far as we are aware, this is the only migrant and homelessness specific support service in Wales which provides holistic support to homeless EU nationals. Find out more [here](#)

Cardiff Council Ty Cyfle (Opportunity House) is a project, funded by the Welsh Government homelessness prevention grant, aimed at EEA Nationals who are homeless as a result of limited access to public funds. EEA Nationals must meet an income threshold to be eligible for Housing Benefit/Housing Element and often lose their accommodation as a result of losing employment. It is very difficult to find employment whilst sleeping rough and very difficult to find accommodation whilst unemployed, which leaves many trapped in a cycle of homelessness.

It has been highlighted that with support and stable accommodation many EEA Nationals could return to or gain employment and manage a private rented tenancy, thus giving the opportunity for a lasting exit from homelessness.

Ty Cyfle aims to provide secure, safe and good quality accommodation to EEA Nationals rough sleeping or accessing emergency homeless accommodation who are unable to access public funds, as well as intensive support to remove any barriers to employment and long-term housing. The project has secured two leased HMO properties with a total of eleven vacancies and provides up to six months tailored support for each resident.

Staffing / Resources

The project has recruited a specific EEA National Project key-worker to provide up to 37 hours per week of support. The project is coordinated by an existing staff member from Cardiff Council's homelessness service and is able to share resources such as leased vehicles. This has proved useful for transporting residents to job interviews and assisting new referrals to move into accommodation.

The project makes use of an established Cardiff Council hostel that operates on a 24-hour basis to provide out of hours emergency support to residents at Ty Cyfle.

Starting and growing the project

Ty Cyfle have produced a Mission Statement, aims and objectives and robust policies and procedures which detail all operations within this project. This includes a process map, referral criteria and information leaflets to be provided to relevant services.

Below are the criteria for TY Cyfle referrals:

- EEA National
- Unable to access Housing Benefit or Universal Credit Housing Element
- Willing and able to work
- Agree to work towards managing a tenancy independently following 6 months support

Covid: as a result of the Covid-19 lockdown, hotel rooms are (at time of writing) being provided to rough sleepers, many of whom had only previously accessed Cold Weather Provision and had not completed an application for Housing Benefit. A Housing Benefit application was submitted for all rough sleepers who accessed emergency hotel spaces and as a result, the project was able to collate information relating to rough sleepers who had been assessed as ineligible for Housing Benefit. This information was used this a foundation for targeting EEA Nationals who meet the criteria and building up a picture of the current numbers and support needs of EEA Nationals experiencing homelessness in Cardiff.

The project aims to provide secure accommodation to individuals and six months of intensive support. Each Ty Cyfle resident has a tailored support plan based on their individual circumstances. There is a designated meeting room in one property to allow for confidential key-work sessions and support can also be flexible to attend appointments and engage in activities in the community.

Individual budgets have been used to remove barriers to employment and private renting such as providing residents with new clothes, toiletries and mobile phones. Good working links have been developed with other services to support residents to address substance misuse and mental health issues such as Cardiff Council's Multi-Disciplinary Team, who are providing therapeutic counselling to several residents.

Private landlord Engagement

An important outcome for the project is engaging with local private sector landlords to provide properties for temporary accommodation and as move on options following this period. Ty Cyfle identified platforms to engage with landlords and set up meetings via Microsoft Teams in line with Social Distancing.

Following these meetings, they were able to develop an effective landlord package as based on feedback on what was on offer which set us up to be competitive in the rental market place. Due to this work Ty Cyfle have been able to seek commitment from a number of landlords and agents, who have agreed to provide properties to act as temporary accommodation for the project and also as move on options for Ty Cyfle residents.

Next Steps

The project will continue to circulate advice and guidance on supporting EEA Nationals and share good working practices with other local authorities who wish to implement a similar way of working. The project will continue to be housing-led and focus on providing safe and secure accommodation at the earliest opportunity followed by intensive, person-centred support. The HMO properties will be available for residents until December 2020.

Help with employment

Ty Cyfle staff have built a positive relationship with the recruitment agency responsible for the "Track and Trace" app and have supported a number of Ty Cyfle residents to secure job opportunities, with the opportunity for new referrals who move to a Ty Cyfle property to also apply.

Outcomes as of 25/06/2020	% of clients
% of individuals who displayed an improvement in their physical health	93%
% of individuals who displayed increased stability in their mental health and well-being	100%
% of individuals who displayed increased stability regarding substance use	85%
% of individuals who displayed an improvement in their financial well being	93%
% of individuals who gained employment	64%

RL's story

Cardiff Council's Ty Cyfle supporting homeless EU migrants with No Recourse to Public Funds

RL was referred to the Reconnection Team after an initial housing assessment where it was ascertained that he had no local connection to Cardiff. RL is of EU origin and lived in an EU country up until 2006, when he left and made his way to another EU country to stay with a friend. RL then left that country and hitchhiked to a city in England.

RL first became homeless when a period of poor mental health led to RL misusing alcohol and losing his employment and accommodation. Between 2016-2018 RL slept rough, sometimes having access to a tent but more often sleeping on park benches or in shop doorways.

In January 2019 RL arrived in Cardiff. RL accessed the emergency Cold Weather Provision at the church night shelters until March 2019 when this ended. RL continued to sleep rough until the Cold Weather Provision reopened in Nov 2019-March 2020. RL has no recourse to public funding and struggled to find employment due to his rough sleeping and mental health.

RL engaged well with Cardiff Council's Outreach team and expressed an interest in finding employment. In March 2020, RL was referred to Ty Cyfle and became a resident in March 2020.

RL was very keen to begin employment as soon as possible as he felt having a structure helps with his mental health. RL was supported to complete an up to date CV and begin looking for a job.

RL used his individual budget from Ty Cyfle to purchase a mobile phone that allowed him to maintain contact with his family over Facebook and clean clothes and underwear. RL felt he had stopped taking pride in his appearance whilst sleeping rough but is now taking better care of himself and feels having access to a shower and toiletries has greatly improved his well-being.

With support from his key-worker, RL gained employment with Cardiff Council's caretaking team and began training on in May 2020. Following a weeks' training he started full time with the team the same month. RL has made a very positive impression on the team supervisor who has described him as an asset to the team.

RL received his first month's pay at the end of June 2020 and has set out a budgeting plan with his key-worker to begin working towards a move to independent living. RL has formed friendships with three other residents at Ty Cyfle who have also been supported to find employment. They have expressed an interest in privately renting a property together to reduce feelings of isolation.

CS's story

Cardiff Council's Ty Cyfle supporting homeless EU migrants with No Recourse to Public Funds

CS was working in a café in Cardiff however when this shut down, he lost his employment and became homeless. Whilst sleeping rough, CS had his bag stolen containing his ID which made applying for benefits or employment very difficult.

CS engaged sporadically with services but due to having no ID and no benefits he had only occasionally accessed emergency provision over the winter period and daily food via the breakfast run. CS was very despondent about services and had little belief in the support he could be offered. CS had been threatened on numerous occasions by other clients which further contributed to him wanting to avoid services and emergency provision.

Earlier in 2020, Ty Cyfle began working with CS. Using an assertive outreach approach, staff were able to build a positive relationship with CS and he started to engage on a more consistent basis. CS began to meet at times agreed and started opening up about his life. CS was provided with a mobile phone which helped to keep support consistent. Following initial street based support, CS became the first resident at Ty Cyfle in March 2020.

After examining CS's case, Ty Cyfle staff established that CS may be entitled to Universal Credit. CS was supported to apply and awarded Universal Credit, including the Housing Element. CS has also been supported to make contact with an embassy of his country of origin in relation to his ID.

CS takes great pride in the shared property. He regularly cleans the communal areas and is always the first to report any repairs and offer to wait in to allow access or accept deliveries.

Since moving to the UK 20 years ago, CS has only lived in over-crowded accommodation which has often been of a very low standard and provided by his employer or slept rough. CS's goal has always been to live in a one bedroom property and not shared accommodation as he very much enjoys his own space. CS began to work towards this goal with his Ty Cyfle key-worker, meeting regularly to discuss budgeting, managing a tenancy independently and to search for a suitable property.

An affordable property within CS's area of choice was found and a viewing arranged for in June 2020. CS was apprehensive about meeting the landlord however he chatted with his key-worker about how to make a good impression and what questions to ask when they attended the viewing together. The property is within Local Housing Allowance rates and therefore CS will not need to make a contribution to the rent, it will be covered by Universal Credit.

The landlord agreed to accept CS as a tenant and he moved to his new home on at the end of June 2020. CS is receiving support in the initial weeks of his tenancy until he is settled into his new home. Following 20 years of rough sleeping and unstable accommodation, CS has the skills and opportunity to make a lasting exit from homelessness.

Newport City Council are currently developing a Welcome to Newport App. The application will be available to all; however, it will contain bespoke content aimed at migrants, which will not only support integration in Newport, but also include information on homelessness services. Newport City Council have also developed Homelessness Information Cards in multiple languages. The cards have been distributed to homeless migrants and contain information on local services and how to access support.

Homelessness teams in local authorities and support organisations could benefit from learning from the Community Pathway Project, therefore consideration could be given to organising practice exchange meetings or visits between different local authorities and whether similar service could be funded in other areas with high migration.

3. REFUGEES

3.1. Key Issues

Wales has four designated asylum dispersal areas, Newport, Cardiff, Swansea and Wrexham, who collectively support 3219 asylum seekers (figures as at Feb 2020)¹⁶. There are no official statistics that we could access on numbers of people granted asylum in Wales.

Between October 2019 and March 2020 Welsh Refugee Council Move-On service supported 495 refugees moving out of Home Office accommodation. Their dependents totaled 360 which makes a total of 855 people. Transposing this figure into annual support, ca. 990 individuals are supported by Welsh Refugee Council annually, including dependents, the figure goes up to 1710 people on an annual basis. It is recognised that these numbers change from year to year.

All local authorities in Wales also take part in UK Government's resettlement schemes for vulnerable refugees, the Vulnerable Persons Resettlement Scheme (VPRS) and the Vulnerable Children's Resettlement Scheme (VCRS). The Wales Strategic Migration Partnership employs a Wales Refugee Resettlement Coordinator who leads on the coordination of these programmes across Wales. The new [UK Resettlement Scheme](#), announced by the UK Government on 17th June 2019, will consolidate the existing VPRS, VCRS and Gateway Protection Programme. In addition to this single global scheme, a new process for emergency resettlement is being developed, allowing for the UK to respond quickly in instances when there is a heightened need for protection, providing a faster route to resettlement where lives are at risk.

Refugees arriving on the resettlement programmes, and via Community Sponsorship schemes, have access to integration support (in contrast to asylum seekers who arrive spontaneously). However, there are real challenges for these refugees, alongside those who arrived in the UK by other means, in accessing sustainable housing in the longer term. Some of the challenges relating to refugee homelessness in Wales are summarized in the sections below.

3.2. Issues identified by Welsh local authorities

One local authority highlighted that more awareness of housing options could be raised amongst refugees facing homelessness and the need to manage expectations of access to social housing.

Local authorities beyond dispersal areas are also experiencing several housing related challenges related to the government resettlement schemes, like VPRS. Costs of

¹⁶ <https://www.wlga.wales/asylum-dispersal>

resettlement are fully funded in the first 12 months, for years 2-5 of the scheme there is funding available to assist with costs incurred by local authorities. This is allocated on a tariff basis over four years, tapering from £5,000 per person in their second year in the UK, to £1,000 per person in year five. Many local authorities which committed to resettling refugees under VPRS, source housing through private rented sector (although social housing is also used by some). Key challenges faced by local authorities can be summarised as follows:

- It is difficult to find homes in the private rented sector at LHA rates, therefore some families are housed in accommodation where the rent is above LHA level. When tariff support is tapered down, and housing element of Universal Credit is the only income available to cover the cost of housing, this can pose a significant challenge
- Benefit cap applies to families after a certain period reducing funds available
- Families are often not 'work-ready' at the point when benefit cap is applied and when tariff support is tapered, often due to the level of English or Welsh acquired and other barriers, which can lead to being dependent of benefits, which do not cover the costs of housing
- Families often experience a delay in Universal Credit claims, which can lead to rent costs not being covered for the period of delay
- Due to the initial support with costs available to families, they are sometimes not used to having to contribute to rent, which can lead to rent arrears going forward

Lack of 4 or 5 bedroom homes was an issue when it comes to housing some refugee families facing homelessness. This is certainly a barrier worth exploring further, in light of the recent recommendations of the Welsh Government First Minister's Advisory Group report on the impact of COVID-19 on BAME people and the possible link between overcrowding and higher infection rates as well as general impact of overcrowding on health.

One local authority also highlighted that there may be differences in practice in relation to the threshold for priority need in terms of homelessness support. The perception seems to be that in Swansea, single refugees with their recognised vulnerabilities are more likely to be seen as priority need than those residing in other dispersal areas, thus leading to inconsistency of approach.

3.3. Other challenges identified in research

The challenges outlined above represent a small fraction of issues identified by research and refugee organisations in terms of homelessness and refugees.

Below is a summary of key issues identified through engagement with refugee organisations and national research:

- The 28 day move-on period in which newly granted refugees have to leave asylum accommodation is much shorter than the 56 day 'threatened with homelessness' period for the purposes of homelessness prevention as per Housing (Wales) Act 2014. Refugees face additional structural barriers related to setting up bank accounts, obtaining a national insurance number, benefits and finding employment. Without targeted support and early interventions, many end up sofa surfing and some become destitute. This is a particular issue for single male refugees who rarely meet the criteria of 'priority need' and struggle to find accommodation despite the valuable support some receive through local authorities and the Welsh Refugee Council Move-On service
- Sourcing affordable accommodation remains a key barrier. Private sector is often the only route single refugees can access and this can be difficult due to barriers such as: no-benefits conditions, discrimination, lack of support for single people to understand and negotiate the private rented sector and funds for deposits or issues with obtaining references
- [Most recent Welsh Government estimates](#), place the BAME population of Wales at 6% of the overall population. However, the proportion of homelessness applicants who were BAME where the local authority positively discharged its duty under Section 75 in the same period [stand at ca. 14 per cent](#) year on year. Our consultation with some local authorities indicates that many of those Section 75 decisions are refugees, most likely to be families. This indicates the particular vulnerability of this group and the prevention of homelessness under Housing (Wales) Act 2014 might not work as well for this group as for the rest of the population due to the barriers outlined in this section
- Where temporary accommodation is provided for homeless refugees, this is usually within mainstream provision, and often there are issues with the appropriateness of this provision, given that the systemic issues faced by refugees, the cultures and the wellbeing challenges, which are often different for this group than for other homeless cohorts¹⁷. As highlighted above, migrant and refugee women experiencing domestic abuse, will often face No Recourse to Public funds conditions (for example, due to spousal visas or recourse to public funds being dependent in other ways on the immigration status of the abuser). This can often lead to homelessness as places in refuges for women with no recourse are very limited and mainly funded by charity funds obtained through fundraising
- Transition from asylum seeker to refugee is often a critical period in terms of homeless prevention and time is limited. It is essential that there is good

¹⁷ <https://www.taipawb.org/wp-content/uploads/2019/06/FINAL-Tai-Pawb-Refugee-Housing-Feasibility.pdf>

communication between Home Office, the local authorities, the asylum accommodation provider and move on support provider. Challenges experienced can relate to granular data in relation to newly granted refugees not being passed on to the local authority and/or partners so that appropriate planning can take place in terms of timely interventions and prevention of homelessness and other support. The latest asylum advice and accommodation contracts (AASC) have introduced some improvements and Migrant Help (advice provider) receives notification from Home Office and contact is made with people who have been granted status. [A guide to these contracts](#) has been developed by Asylum Matters

- Asylum seekers and refugees will often experience specific barriers to accessing health services, including mental health support. Stigma associated with mental health problems can also prevent individuals from accessing the right support. Homelessness advice and assistance can be dependent on access to those services. It is important to be mindful of the barriers which refugees may be experiencing. Public Health Wales report *The Health Experiences of Asylum Seekers and Refugees in Wales* offers insights into these experiences and recommendations for improving access¹⁸

3.4. Good practice examples and useful information

Key advice to local authorities and homelessness providers in relation to preventing and reducing homelessness amongst refugees is summarised below:

- Local authorities facing challenges related to resettlement programmes have developed a number of practices which can help deal with issues outlined above. Some of these practices include:
 - Sourcing accommodation at LHA rates only. Some local authorities are working with Registered Social Landlord's social lettings agencies where properties are secured at LHA rate and affordable (although Benefit Cap can still remain an issue)
 - If delays in UC claims are experienced LAs are advised to claim £100 per person from exceptional costs
 - Budgeting advice is provided on arrival, with clear policy and information on top-ups
 - Early messages to families around responsibilities for making rental shortfalls, some advantages to direct rent payments to ensure arrears are not experienced
 - Wrexham Council have established a Promoting Independence Fund for refugees. Akin to a discretionary grant system, refugees can apply for support

¹⁸ https://ihcc.publichealthnetwork.cymru/files/5015/5419/2886/HEAR_Report_ES_English_FINAL.pdf

for ESOL support, rental assistance top up), integration, driving, changing qualifications etc

- Wrexham Council have also worked with their welfare rights and letting manager (Supporting People) to establish a 'reducing shortfall' process. Within this application families have to evidence exit strategies and what has been done and what they will do to ensure that costs can be covered going forward
- Wales Strategic Migration Partnership have developed a [series of resources](#) to support local authorities with resettling refugees. These include a Cultural Orientation Toolkit¹⁹ a section of which was specifically designed to address a range of issues and expectations around housing. It should be considered whether similar resources could be applied to refugees and asylum seekers in different settings
- Clear partnership working arrangements, with support and accommodation pathways for newly granted refugees should be established between local authorities, asylum accommodation provider (in Wales, Clearsprings/Ready Homes), Migrant Help, refugee support organisations, mainstream housing support and accommodation providers and other relevant support organisations²⁰. For example, initial advice is provided and referrals are made to support services such as Welsh Refugee Council Move-On service, which works in conjunction with Migrant Help and the Local Authority to prevent homelessness and support access to benefits. Work is also ongoing with the Home Office in terms of provision of early notification of people granted refugee status to local authorities

The Wales Strategic Migration Partnership convenes regular multi-agency discussions to support partnership working around asylum, migration and refugee settlement programmes, to ensure a joined-up and proactive approach to addresses issues and impacts related to migration. The team can provide support to local authorities and other agencies with advice and information on migration. For further information visit:

<https://www.wlga.wales/wales-strategic-migration-partnership> @WSMP

- Homelessness Prevention Strategies should take account of the vulnerability of new refugees to homelessness ²¹

¹⁹ <https://www.wlga.wales/resources-to-support-syrian-refugees-in-wales>

²⁰ https://gov.wales/sites/default/files/publications/2019-03/nation-of-sanctuary-refugee-and-asylum-seeker-plan_0.pdf

²¹ https://gov.wales/sites/default/files/publications/2019-03/nation-of-sanctuary-refugee-and-asylum-seeker-plan_0.pdf

- Those local authorities which have established working relationships, partnerships and leasing schemes with private sector landlords could explore how to maximize the use of these arrangements for refugees without priority need

Swansea Council working with private landlords and accommodating homeless refugees

During September 19 – March 20, Swansea Council utilised part of the funding awarded under Homelessness Prevention Grant by working with a number of private rented landlords who have been able to assist with those who have recently received refugee status. The council utilised the prevention fund to accommodate 3 households, specifically the money was used to obtain bonds/rent in advance.

In the same period, the Housing Options Teams accommodated and supported 11 refugees in temporary accommodation. Out of the 11 households, 9 have been housed in permanent accommodation with either Local Authority or Registered Social Landlords and 2 are currently under offer. A number of these households have on-going support in place. In addition, Swansea City Council placed a failed asylum seeker in Bed and Breakfast.

Cardiff Council engagement with private landlords

Cardiff Council Ty Cyfle project engaged with local private landlords to secure accommodation for EU migrants who were service users of the Ty Cyfle project.

Find more information on the project and work with private landlords in Section 2.4 of this guide.

Local authorities could explore closer working with refuge support organisations and asylum accommodation providers to raise awareness of housing options, homelessness support available and homelessness legislation as soon as a decision is received. The Welsh Refugee Council and Migrant Help service are both funded to provide interventions and support during the critical transition phase and should also ensure early and proactive engagement and agreed information sharing processes with local authorities, which will add significant value and help prevent homelessness. It will be very important for local authorities and these support providers to work together to ensure awareness of homelessness legislation and any changes in homelessness policy or guidance. Local Authorities often report that newly granted refugees lack awareness and may have misconceptions around what may be available to them. This can also include working with

mainstream support providers who might be accessed by refugees and funding specific housing support, as is the case with Lighthouse Project in Newport (see below).

- Local authorities could raise awareness of deposits and rent-in-advance schemes as well as discretionary housing payments and ensure that these can be accessed by new refugees. In some cases, Refugee Integration loans will be available to new refugees to fund initial costs of housing, find out more [here](#)
- Where local authorities or support organisations provide employment support, this should be promoted to new refugees or refugee specific services could be developed as part of housing support grant. Some of the employment good practice outlined in Section 1 of this guide will also be relevant to this group

Homeless link has developed a guide to homelessness and refugees with useful information and suggestions in this area. Find out more [here](#)

- Sanctuary seekers are likely to have experienced significant Adverse Childhood Experiences. Many homelessness advice and support providers in Wales have adopted trauma informed practice, but less might be known about the particular experiences of refugees and asylum seekers. Public Health Wales' report *Adverse Childhood Experiences in child refugee and asylum seeking populations*²² provides an important insight in this area. It analyses ACEs based in three stages: pre-migration, migration journey and post-migration. The report offers advice and information on how services can help prevent further ACEs on arrival in host countries and mitigate the negative impact that ACEs may have on health, well-being, education and broader outcomes in both the short and longer term
- *Homelessness amongst people from BAME populations in Wales* report from Shelter Cymru and Tai Pawb provides a detailed insight into some of the issues faced by refugees, good practice and solutions related to refugee homelessness. Find out more [here](#)
- As outlined above, lack of affordable housing options remains a key issue for new refugees. Developing temporary move-on housing options for this group is a key recommendation of the 2019 Tai Pawb and Joy Unlimited report: [Refugee Housing and Support feasibility study](#) and most recently, one of the recommendations of the *Welsh Government First Ministers BAME COVID-19 advisory group report*²³. The study explores temporary refugee housing models in England and explores how such initiatives could be developed in Wales. There is an increasing number of these initiatives in England and the report provides a good basis for development of

²² <https://www.wmsmp.org.uk/wp-content/uploads/ACEs-in-Child-Refugee-and-Asylum-Seekers-Report-English-final.pdf>

²³ <https://gov.wales/black-asian-and-minority-ethnic-bame-covid-19-socioeconomic-subgroup-report>

similar models in Wales. Partnership between a local authority, housing associations, private sector landlords and refugee organisations are key prerequisites of such models. Work is currently ongoing on developing a pilot model in Newport

ACH was founded in 2008, became a registered social landlord in 2012 and set up a training arm in 2014. ACH describes itself as a “social enterprise working to resettle refugees through labor market and social integration”. It currently has 65 staff and works with around 2500 people a year.

ACH's primary aim is to house single vulnerable adults with support needs, and it specialises in supporting newly arrived refugees. It provides a network of safe, high-quality and well-managed supported accommodation across Bristol, Birmingham and Wolverhampton, which focus on helping tenants to overcome their difficulties, learn new skills and prepare for independent living. They stress the importance of their model being based on lived experience and cultural understanding of the clients which enables them to support their resettlement and integration needs by helping to develop key skills and build the social bridges that are necessary for them to sustain tenancies and move on with their lives. The support they provide focuses on:

Finance and benefits	Health issues
Education, training and employment	Cultural integration and social inclusion
Legal and immigration assistance	Moving on - Council and social housing applications
Family reunions	

In terms of the accommodation element to their work, ACH has been gifted some properties, has others on a long-term lease with a peppercorn rent from the local authority and has leasing arrangements with private landlords. It provides temporary accommodation in single gender shared housing for 4 to 6 people (with one larger scheme) to single refugees. As the refugees accessing this accommodation are considered vulnerable, the accommodation meets the criteria for exempt accommodation under Housing Benefit rules. This enables the organisation to meet the tenants’ needs by providing appropriate support and advice.

In addition to accommodation, the organisation provides training through its subsidiary – Himilo – which enables tenants to access career advice and short, vocational training courses, particularly around English, Maths and digital skills. It also delivers Property Maintenance Apprenticeships and works directly with several employers to source staff from the refugee and BAME communities.

Action Foundation

Action Foundation is a charity which aims to empower vulnerable asylum seekers, refugees and migrants in overcoming exclusion and poverty by creating opportunities for them to lead safe, independent and fulfilled lives. Based in Newcastle upon Tyne the organisation provides support to disadvantaged refugees, asylum seekers and other migrants across Tyne and Wear. It operates a range of services including three supported housing projects and an English language school.

The Foundation started in 2006 as a response to the needs of the local community identified by City Church in Newcastle. Following research into the greatest needs in Newcastle and an assessment of how the church might be able to help meet those needs, it started by helping asylum seekers with no recourse to public funds. The housing element of their work began initially through securing a property from a philanthropic landlord to provide supported accommodation to 4 destitute asylum seekers. The English language work began in 2007 with a summer school and they launched Action Letting in 2012.

Action Letting provides accommodation and support to new refugees and helps prevent homelessness as they transition from the support of the asylum process to living independently. To date they have supported 147 beneficiaries through this project.

In 2015/2016 Action Letting, Action Housing and Action Language projects were expanded into Sunderland in response to a recognised need and demand for these services. They also launched their second social enterprise, Action Language PRO, which provides fee-paying professional English courses. This contributes financially towards the delivery of their free classes.

Practice in Wales

Wrexham council reported close working with the Welsh Refugee Council move-on service which assists refugees leaving Home Office accommodation. Welsh Refugee Council Asylum Rights programme also works with asylum seekers to increase their understanding and access to rights (see also Section 4.4).

Wrexham County Borough Council starter packs for migrants and other support

Between September 2019 and March 2020, Homelessness Prevention Funding has been utilised by Wrexham Council to develop and deliver starter packs. The packs help migrants settle into accommodation by providing essential goods, so that additional monies can be utilised for other things. Wrexham Council housing support officers also assisted those at risk of homelessness with advice and practical solutions including transport, school provision and local amenities. Moreover, additional temporary accommodation placements have been provided by the council for migrants experiencing homelessness. In total 23 migrants have been supported in this period by Wrexham council.

Cardiff Council homelessness prevention officer told us that they work closely with the Welsh Refugee Council and have recently started organizing surgeries in Welsh Refugee Council to raise awareness of homelessness advice and support available from Cardiff Council, and enable early prevention of homelessness amongst those refugees who might be leaving Home Office accommodation. The sessions are proving useful, allowing Cardiff Council to see up to 12 people over a two-hour period. Within this activity, Cardiff Council is particularly interested in targeting single males, a group least likely to have a priority need status under Housing (Wales) Act 2014. For this group, the council can offer a tenant matching scheme run in partnership with private sector landlords, which can enable easier access to landlords.

Newport reported on good working partnership with Welsh Refugee Council Move-on service and the Lighthouse Project.

The Lighthouse Project

The Lighthouse Project, run by Taff Housing Association and funded through Housing Support Grant in Newport is a housing support service which is an additional resource available in Newport to refugees seeking housing or in need of other housing support.

The Lighthouse Project (amongst other services) has a designated refugee support worker, working closely with the Welsh Refugee Council. The aim of the service is to support refugees and people from minority ethnic communities by enabling them to live more independently within their local community, to maintain their own homes and improve their quality of life, in partnership with statutory and voluntary agencies. The project is funded through Newport Housing Support Grant. Find out more [here](#)

The Welsh Refugee Council Move-on service

The Welsh Refugee Council Move-on service is funded through Welsh Government to support refugees as they enter the 28-day period in which they need to move-on from the Home Office provided accommodation and support. WRC caseworkers in Cardiff, Newport, Swansea and Wrexham help people to navigate the transition to their new life and to understand the rights and responsibilities it brings. The team meet new refugees as soon as possible.

With no “priority” need for housing, many refugees are expected to find their own accommodation with private landlords. WRC aim to prevent homelessness through working closely with local advice and support agencies, hostels and local authorities to find the best possible place for that person. The service enables people to open bank accounts, to access employment support, and to access other specialist entitlements based on their individual needs, including homelessness support and housing. The service supports hundreds of refugees every year.

Housing support provided by the Welsh Refugee Council is soon to be boosted by additional housing support worker funded by the Oak Foundation to make closer links with landlords and source accommodation - a key challenge for service users. The service refers people for further advice and support to local authority homelessness teams, although it is acknowledged that local authorities are at times constrained by lack of affordable accommodation in their respective areas. Find out more [here](#)

4. PEOPLE WITH NO RECOURSE TO PUBLIC FUNDS

4.1. Key Issues

No Recourse to Public Funds (NRPF) is a term used to refer to people who cannot access mainstream housing or benefit because of their immigration status. Those funds include means-tested and disability related benefits, child benefit, access to social housing and homelessness assistance. Most other money derived from public funds Social Services and Well Being (Wales) Act, which is used by Local Authorities to prevent destitution of children and their parents as well as vulnerable adults and young people formerly looked after by a local authority – is not treated as public funding for immigration purposes.

In most cases, people with no recourse to public funds may become known to local authorities at a point of crisis, often when they are facing or experiencing destitution, exploitation or other abuse. However, local authorities should be aware that significant numbers of people with NRPF may be resident in the area without necessarily presenting to services for a variety of reasons. Structures and mechanisms should be in place to reach out to vulnerable and destitute migrants and provide support and interventions.

There is no comprehensive data on the scale of destitution in Wales or the numbers of people with NRPF restrictions. As indicated above, many homeless people with NRPF are likely to be hidden – sofa surfing, relying on support from family or friends or resorting to survival strategies. Research has shown that some people would rather live in poverty and in constant fear of deportation, becoming reliant on friends, transactional relationships, commercial sex work or low-paid illegal work to survive, rather than return to their countries of origin²⁴. Estimates range from several hundred people annually (Welsh Refugee Council) to over 5000 accessing voluntary services every year in Wales (JRF study²⁵).

People with no recourse to public funds can come from a variety of immigration backgrounds. Usually the groups encompass:

- No current immigration permit/visa
- EU nationals or family members without right to reside
- People with leave to enter or remain with the NRPF condition
- Refused asylum seekers
- People pre-asylum claim
- During asylum claim

²⁴ <https://policy-practice.oxfam.org.uk/publications/coping-with-destitution-survival-and-livelihood-strategies-of-refused-asylum-se-121667>

²⁵ <https://www.jrf.org.uk/report/destitution-uk-2018>

4.2. Issues identified by Welsh local authorities

More often than not, local authorities are unable to provide accommodation for people with no recourse to public funds through the homelessness route because of the legal restrictions. In some cases, accommodation and support will be provided through social services, although anecdotal evidence suggests that many people supported through this route are living on extremely low weekly budgets.

Newport Council reported that around 30 enquiries are received each year in relation to individuals with NRPF. Requests for support originate from a range of sources, including third sector partners and internal service areas (for example, social services). Some NRPF cases can be complex and may require lengthy time investment and engagement with Home Office and other partners to address and resolve.

NRPF cases in the 12 months preceding the writing of this report have included:

- EU migrants who are not /no longer able to exercise their treaty rights due to poor health
- EU migrants who have left their spouse due to Domestic Violence
- (Single) EU migrants who are unable to support themselves through employment because they cannot afford childcare
- People who have overstayed their visa
- Migrant victims of Modern Day Slavery

There is a need to increase the understanding of eligibility rules affecting people with NRPF amongst public services and third sector, including duties owed to people with NRPF under homelessness and/or social services legislation. Enabling migrants to access their rights and entitlements means that local authorities and partners need to understand NRPF policy and its interaction with Wales legislation and social service's duties. A consequence of lack of knowledge and resources of LAs and partners agencies in supporting people with NRPF, including survivors of gender based violence and domestic abuse, often means that people are passed between different services with support being provided late or not at all.

As of June 2020, forty four people with No Recourse to Public Funds have been temporarily housed by Welsh local authorities under the emergency Covid-19 provisions with ca.70 supported up to September 2020 (according to data collected by Homelessness Networks). It is important to acknowledge however that this is probably the tip of the iceberg, with many destitute people who may not have presented for support. In addition to figures reported above, there will be many other people with NRPF across Wales, who may be in danger of redundancy or losing employment due to COVID-19. Inadvertently,

some of these people, as is the case in other communities, may be accruing debt and rent arrears. Due to their NRPF status, they lack the safety net of welfare support.

Developing re-housing solutions for this group remains a challenge and there is real risk that this group may become street homeless when the emergency COVID provisions are no longer in place. Whilst tackling this risk is rightly a priority at the time of writing this report, it will also be important to build on any new ways of partnership working aimed at reducing risks of destitution which emerge from the crisis. Welsh Government is currently in the process of commissioning No Recourse to Public Funds guidance, to assist local authorities and other partners navigate some of the complexity surrounding the policy.

4.3. Other challenges identified in research

- The Wales Strategic Migration Partnership Uncharted Territory report²⁶ highlighted specific issues faced by women with NRPF who are victims of violence or abuse. As a follow up to this research the WSMP commissioned further research into how 'No Recourse to Public Funds' status affects those experiencing gender based violence, domestic abuse and sexual violence in Wales²⁷. A key finding of this research was that local authorities were in the main unable to provide information on numbers and circumstances of people they were supporting with NRPF. The lack of adequate recording mechanisms identified is an issue which has still not been addressed

²⁶ <https://www.wlga.wales/SharedFiles/Download.aspx?pageid=62&mid=665&fileid=1828>

²⁷ <https://www.wlga.wales/wales-strategic-migration-partnership>

Swansea Council Case Study:

Support provided to family with NRPF experiencing Domestic Abuse

The case example below highlights how funding to tackle homelessness amongst migrants under Homelessness Prevention Fund has benefitted a family with No Recourse to Public Funds experiencing domestic abuse, as supported by Swansea Council.

K has been in the UK for over 5 years since she got married, her husband has a European non-EU passport whereas K and I (daughter) hold EU Passports. K has had to flee that marriage due to domestic abuse and the protection of her child after the perpetrator assaulted her in front of her daughter.

K came to Swansea Women's Supported Housing from a refuge in a smaller town as she felt unsafe due to the placement being within close proximity of a shop the perpetrator often visits. Whilst there, a claim was made for Universal Credit and it was assumed she had been accepted as on her UC it stated she would be issued with a payment in December 2019. K was subsequently informed by Universal Credit that she is not entitled to benefits due to not being available for work as I is not in school until she is 3 years old which is not until June 2021. Without committing funding K and I (and unborn) would have been destitute and vulnerable to further trauma and assault and that may have raised other Child Protection that would have needed to be addressed in a more intrusive way.

As a result, C+F services, Swansea have been funding a specialised refuge placement for a mother, her daughter and her unborn child since November 2019 at a cost of £201.60 per week along with living expenses averaging around £70 per week. Between 28/11/19 and the 11/03/20 Total of 16 weeks –£4,559.17 was committed. This placement continued past the 31.03.20 and remains active today.

Between the 19.09.19 and the 31.03.20, Social Services (C+F) in Swansea Council have supported 5 separate NRPF families in relation to accommodation and living expenses. Between the 5 families there were 7 children.

- No Recourse to Public Funds can make finding support such as refuges very difficult, because income support or housing benefit is the usual method of funding these services. This can lead to women being given the unacceptable choice of tolerating abuse or becoming homeless. The Home Office Destitution Domestic Violence Concession was developed to address the problems of women and girls experiencing violence but unable to seek help due to NRPF²⁸ although the concession requires very high standard of proof and excludes some categories of people. There is a shortage of legal advice and lengthy waiting periods for advice for migrant women facing domestic abuse, necessary enable them to apply for leave to remain so they are not compelled to stay in an abusive relationship
- Other key challenges facing people with NRPF are:
 - Access to immigration advice
 - Money for immigration applications
 - Access to accommodation when not entitled to local authority social care support (or in interim periods when eligibility is being assessed)
 - Right to Rent legislation (limited to England but with a potential expansion to Wales)
 - Access to cash and support such as food and basic necessities
 - Vulnerability to violence and exploitation
 - Health risks, including potential heightened risk of COVID-19 as has been highlighted during the pandemic

4.4. Good practice examples and useful information

- Services for destitute people with NRPF are often fragmented. It is important for all stakeholders to work together and develop multi-agency agreements and appropriate pathways out of destitution for different groups within this cohort. This work could be led by local authorities, who at the same time should consider engaging with the Wales No Recourse to Public Funds Network (co-chaired by WSMP, British Red Cross and the Welsh Refugee Council, with support from the UK NRPF Network-see below)
- At a local level, local authorities should engage with groups supporting people with NRPF, health, housing support services and other relevant stakeholders. Where support is in place, usually to safeguard children and vulnerable adults, it needs to be recognised that, on its own, it is not a sustainable solution. A multi-agency

²⁸ <http://guidance.nrpfnetwork.org.uk/reader/practice-guidance-families/immigration-information/#114-destitution-domestic-violence-concession>

pathway would ideally include access to immigration advice, support from charities, referral to social services and information about reconnection to home countries. Early intervention is key in avoiding homelessness. Good practice guidance for homelessness services on developing pathways out of destitution is available from Homeless Link, view [here](#)

- Destitution will of course have profound impacts on people experiencing it and impact on local authority and other resources will also be considerable. It would be important to quantify this financial and human impact and for this to be part of discussions with government departments responsible, with a view to reducing financial pressures on local authorities and mitigating against the human costs. A study from NRPF Network²⁹, quantified the impact on 59 local authorities in England where 2658 households were supported via social services at an annual cost of £47.5 million, this includes the cost of housing. There is a need for LAs across Wales to develop common recording frameworks which capture people being supported with NRPF, numbers and costs
- It is extremely important that people with NRPF are able to access immigration advice. NRPF network³⁰ found that 80% of households supported by local authorities in England exited services due to a grant of leave to remain with recourse to public funds, enabling them to access mainstream benefits. Local authorities and homelessness support services need to bear in mind that it is a criminal offence to be providing immigration advice unless the service is regulated by the Office of the Immigration Services Commissioner. In general, legal aid is not available for most immigration matters and close working with voluntary agencies providing such help is crucial to resolving cases. Welsh Government reports that in 2020/2021 it will commission a scoping study to better understand the gaps in immigration legal advice and identify where it can support better access and provision. Currently many legal firms feel that provision of immigration advice impacts on their sustainability
- In some local authorities in England, an in-house immigration adviser is available to those with irregular status. Others required immigration advice to be provided/commissioned as part of their housing support contracts. It is worth considering whether resources could be pooled by Welsh local authorities to fund access to such advice, considering the shortage of free advice. This investment could represent a significant saving on social services and housing provision going forward
- Homeless link practice guide on immigration advice and homelessness is available to view [here](#)

²⁹ <http://www.nrpfnetwork.org.uk/News/Pages/NRPF-data-2019.aspx>

³⁰ [ibid](#)

Asylum Justice is the only charitable organisation in Wales, and one of only two operating in the United Kingdom, offering free legal advice and representation to asylum seekers, recognised refugees and other vulnerable migrants. No other organisation provides this service in Wales and consequently Asylum Justice is the last and only place that people can turn to for help when they fear for their lives or the safety of their family in their country of origin. In addition, Asylum Justice provides free legal representation to other migrants pushed to the margins of society, such as women previously trafficked to the UK or who are victims of domestic violence. Asylum Justice represent this group in applications to obtain legal status in the UK, an area of law no longer covered by legal aid. Find out more [here](#)

Street Legal is a cross-sector partnership bringing together St Mungo's (homelessness charity), Refugee Action and Praxis Community Projects in London.

The philosophy of the Street Legal programme is to take the service to the hardest to reach groups – those that are not accessing building-based homelessness and immigration services or are not well served by them due to a lack of flexibility and understanding of the complex needs of the client group by mainstream providers. Street Legal advocate for immigration issues to be seen as a support need, rather than as a barrier to accessing support.

Street Legal provides immigration advice to rough sleepers in London.

The aim of Street Legal is to ensure all clients have a route out of rough sleeping either by:

- Resolving their immigration situation, securing necessary documentation and securing housing and support both during the process and following its resolution; *or*
- Facilitating a dignified return to a home country through assisted voluntary return

Find out more [here](#)

- For most people with No Recourse to Public Funds who manage to access local authority support, this support will be provided through social services. Many people supported through this route will manage to regularise their status and may become eligible for homelessness prevention, relief or full duty support. For homelessness services and housing support organisations who may come across people with NRPF, it is important to be aware of rules regarding eligibility for social services support. While full guidance for local authorities is yet to be developed, in the interim, the Welsh Government and Welsh Refugee Coalition recently [published a note](#) which addresses some of the common misconceptions regarding eligibility
- Right to Rent legislation is currently in operation in England however this includes a provision which allows UK government to bring it into force in Wales (and other nations). COVID has meant some modifications to the scheme and the UK Government have announced that right to rent checks have been temporarily adjusted due to coronavirus (COVID-19), to make it easier for landlords to carry them out. Find out more [here](#)
- Right to Rent makes it a criminal offence to be renting privately to a person with no immigration status. In recent years judicial review of the legislation was granted and it was initially ruled illegal on the basis of racial discrimination and human rights breaches. However, on government appeal this was overruled. There are plans to challenge this decision in Supreme Court. As it currently stands, the UK Government has the ability to extend the legislation into Wales. Anecdotal evidence from Tai Pawb's Open Doors project (which worked with private landlords to promote equality) suggests that in some places in Wales, private landlords erroneously refuse to rent to people with no immigration status (or those with immigration status but perceived as high risk) on the basis of Right to Rent. It is important for homelessness departments to be aware of this. If the legislation is extended to Wales, this might lead to an increase in the numbers of homeless migrants with no immigration status, who might have previously had a source of income
- There are a number of hosting projects in Wales which link private hosts with destitute asylum seekers or migrants. Websites often provide information on other support available, including access to necessities:
 - Sharedydd in Cardiff
<https://cardiffdestitutionnetwork.wordpress.com/sharedydd/>
 - ShareTawe in Swansea
<https://swansea.cityofsanctuary.org/share-tawe>
 - Refugees at home also provides hosting support in Wales
<https://www.refugeesathome.org/>

- The Gap Newport has access to a limited number of hosts in Newport
<https://www.thegap.wales/>
- Home4U Cardiff - is currently the only housing project providing limited shared housing for destitute asylum seekers <http://home4ucardiff.org/>
- Night shelters and hostels are also accessed by some refused asylum seekers and destitute migrants although access is not uniform across Wales

Wales Strategic Migration Partnership, Red Cross and Welsh Refugee Council co-chair the Wales No Recourse to Public Funds Network. The network focuses on the statutory duties to migrants who have no recourse to public funds. It aims to bring together public services, home office, and third sector to develop common solutions to issues experienced by people with NRPF. Local authorities' staff are encouraged to attend the network to share good practice and develop joint solutions. For further information contact anne.hubbard@wlga.gov.uk

The NRPF Network in England is a network of local authorities and partner organisations focusing on the statutory response to migrants with care needs who have no recourse to public funds (NRPF). The NRPF Network operates under the auspices of the Association of Directors of Adult Social Services (ADASS) and the Association of Directors of Children's Services (ADCS) Asylum Taskforce.

The NRPF Network works at practice, policy and strategic levels and aims to:

- Share information and good practice amongst local authorities and other agencies working in this area
- Support local authorities in meeting their statutory duties to people with NRPF
- Work with the UKBA and other government departments to improve the efficiency of resolving local authority supported NRPF cases
- Represent the concerns of local authorities in regard to the NRPF client group

The NRPF Network website has a wealth of resources and guidance available to local authorities and other organisations, including information on eligibility to access support. Whilst it is worth noting that some of the information is England specific, plenty of NRPF network guidance is also relevant to Wales.

The NRPF Network has produced a web tool - Support for migrant families. This provides information about a person's support options, what social services will consider when a family requests support, information to help the person obtain immigration advice and information about other services as appropriate, for example, voluntary return. The web tool has been accessed by over 8000 individuals in its first year of operation. (please note some of the advice may not be relevant to Wales).

- Find out more [here](#) (Migrant Families – NRPF Network)
- Find out more [here](#) (NRPF Network – About Us)

Salvation Army in Cardiff has a number of 'pods' within their accommodation for homeless single people with no recourse to public funds. Salvation Army have also developed links with immigration solicitor who can help homeless people with NRPF to regularise their status. Access to legal advice and knowledge of immigration systems is extremely important as without it, homeless people with NRPF have very limited choices.

BAWSO also provides some spaces in their refuges for survivors of domestic abuse with NRPF, as well as providing assistance and support for the survivors to be able to find pathways into accommodation and support. In both cases these spaces are limited as they are usually funded by internal charity budgets/fundraising.

Welsh Refugee Council have been funded by the Welsh Government to deliver the Asylum Rights Programme (ARC). The programme has a key role in preventing asylum seekers from becoming homeless and tackle housing challenges. The programme recognises that for asylum seekers, there are many barriers to receiving the limited support they are rightly entitled to. ARC ensure that, wherever possible, people access this support so that they have somewhere safe to sleep and enough to eat. Amongst others, the programme:

- Challenges incorrect decisions made by housing providers and the Home Office including supporting appeals at Tribunal
 - Supports people to complain about unsafe, insecure or damp asylum accommodation. ARC notes that they see people expected to live in homes with leaking ceilings, carpets flooded from faulty plumbing, pest infestations, lack of heating and hot water and broken locks and doors
 - Provides vital support to homeless asylum seekers giving urgent financial assistance in the short term and identifying pathways back into accommodation and financial support
-
- Much of the advice on reconnection relevant to EU migrants will also be relevant for other migrants and groups with NRPF although reconnection might be less of an option for people facing persecution in home countries. The Home Office provides voluntary reconnection service for non-EU nationals. Additional financial support to settle in home countries is currently available due to Covid-19. It should be stressed that reconnection should only be offered within the context of an assessment which explores whether the individual has exhausted the appeals process, is entitled to further legal representation and other factors. Find out more [here](#)
 - Homeless link produced a good practice guide on reconnections which is available to view [here](#)
 - Access to accommodation plays a crucial role in supporting people with NRPF out of homelessness and destitution. It provides a safe and secure place to stay where a destitute migrant with NRPF can focus on the next steps and a potential route out of destitution. Many destitute migrants and asylum seekers will not be able to access social services support. Developing accommodation options specific to those groups, can provide the much-needed base and temporary home

In 2019 the Welsh Government commissioned a **feasibility study** to explore ways of increasing accommodation options available to refused asylum seekers who may be able to appeal the negative decision on their asylum claim or have grounds for a fresh claim but need stability to facilitate access to and engagement with immigration advice to identify a pathway out of destitution. The report considers how accommodation models operating in Wales and in other places can be further developed and/or replicated.

The report sets out the policy context for the feasibility study, findings and recommendations for exploring accommodation models which could be further developed and/or established in Wales.

The report also identifies significant policy and practice differences between devolved nations around housing and social care.

The report provides a wealth of information about accommodation models in place in different parts of UK. It also outlines the role and provision of some of the organisations which have pioneered accommodation models for refused asylum seekers and other migrants with NRPF. Following the publication of the report, **Welsh Government committed to implement its recommendations** and partnership work is ongoing in this area.

The report also provides useful information on:

- Immigration advice
- Projects and services supporting destitute asylum seekers in Wales
- Differences in legislation and eligibility for support between devolved nations
- Feasibility and estimated cost of further developing accommodation options for destitute asylum seekers in Wales

NACCOM is a national network preventing destitution amongst people seeking asylum, refugees and other migrants.

It has been a national charity (CIO No: 1162434) since 2015 and an informal network of voluntary organisations since 2006.

NACCOM, the UK-wide No Accommodation Network, was initiated in 2006 by Boaz Trust to bring together projects supporting destitute asylum seekers. At the time, Boaz Trust was one of a growing number of volunteer-led initiatives organising practical responses to the needs of destitute asylum seekers from the early 2000's following successive changes to immigration legislation coupled with systems failures which increased destitution.

Some of these grassroots initiatives developed accommodation projects for people seeking asylum and other migrants with no recourse to public funds (NRPF) who have no resources to pay accommodation costs.

NACCOM came together as a means of helping to coordinate and join up these initiatives, sharing learning and resources and providing mutual support and encouragement.

Accommodation provides a base enabling other practical assistance, in particular advice and casework support, to be more effective in supporting pathways out of destitution.

In addition, NACCOM members wanted to use their direct experience of alleviating destitution to campaign collectively, and with other organisations, for a better and more humane asylum and immigration system that did not leave people destitute.

NACCOM today has 56 full members, and there are new organisations developing accommodation initiatives in different parts of the country every year.

Naccomm produced a [video](#) about the impact of destitution in the UK. More information on NACCOM (including a links to projects / organisations delivering housing for destitute migrants) can be found [here](#)