



14/09/2023

Dear Secretary of State,

We are writing to you as local authorities concerned about accommodation provision for people seeking sanctuary. As members of the City of Sanctuary Local Authority Network, we are committed to playing our part in welcoming and safeguarding the welfare of all people in our communities, including people seeking sanctuary and people granted leave to remain. In doing so we are firmly determined to meet our obligations as per the Children's Act, Care Act, Equalities Act, Housing Act 2004, among other relevant legislation.

Members of the local authority network participate in various government schemes such as ARAP, ACRS, VPRS, Asylum Dispersal, Community Sponsorship, Homes for Ukraine, Hong Kong BNO scheme, National Transfer Scheme, and have hosted bridging and contingency accommodation sites.

We welcome funding packages that enable us to build capacity within our councils and wider local stakeholders to ensure that we are able to meet the needs of new arrivals. We also welcome the recent Local Authority Housing Fund (LAHF) and SAF (in England) aimed at making housing options available to people from Ukraine and Afghanistan.

However, we also share concerns with how schemes are being implemented and would like to suggest the following for your consideration.

In terms of Refugee Accommodation:

- As a result of the government's streamlined asylum process and its efforts to reduce the backlog of asylum decisions, we are seeing increased demand for homelessness prevention services. Coupled with the recent reduction in move-on period from 28 to 7 days, this is resulting in an escalation of homelessness and rough sleeping. These changes are not reflected in funding made available to councils and could make costs for temporary accommodation spiral.
- Communication between Local Authorities and relevant government departments is inadequate to enable us to do long term planning, for example hiring staff for move-on and integration services.
- Funding settlements/tariffs and relevant guidance for the various schemes differ substantially and change frequently, despite housing, wrap-around and other support needs being similar between the different schemes, thereby creating an unnecessary bureaucratic burden.
- The timelines for participation in schemes such as LAHF and SFA (in England) are unrealistic and insufficient to meet the demand for housing as a result of HfU, ARAP and ACRS. People with recent positive asylum decisions are excluded from benefiting from the schemes which can leave many newly recognised refugees homeless or in temporary accommodation at the cost of the council.

We kindly ask that you consider the following:

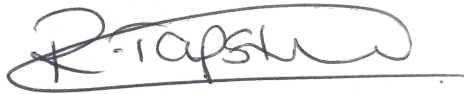
- Roll back the changes to the move-on period to enable Local Authorities to meet the demand for homelessness prevention services.
- Provide local authorities with the guidance, data and funding necessary to enable us to fully support people so that they can successfully navigate the move-on period.
- Improve communication with Local Authorities prior to the design and implementation of resettlement or other humanitarian protection schemes to enable long-term planning within Councils.
- Align and simplify funding tariffs provided to councils to enable flexibility/discretion and to remove the unnecessary bureaucratic burden.
- Ensure that all schemes and policy changes that place duty on councils to prevent homelessness, are adequately funded.

In terms of Asylum Accommodation, we are concerned that:

- Communication and data sharing between Local Authorities and relevant government departments (and their contractors) is unsatisfactory and prevents councils from being able to meet the needs of vulnerable people placed in our communities, as well as our statutory duties according to relevant legislation. For instance:
  - Many councils find out about new dispersal bed spaces late, if at all, which means we are unable to put appropriate services in place in a way which is in the best interest of individuals, families and host communities.
  - Poor communication in terms of new, or maximised contingency accommodation prevents us from being able to make proper assessments as to appropriateness of sites. Though multi-agency forums exist to support contingency accommodation they lack structure, senior Home Office staff are often absent, staff turnover is high and follow-up on actions is limited.
  - We also have concerns with movement of people around the dispersal estate (including contingency sites) and how that impacts vulnerable individuals and families. For example, when children are moved between local authority areas, with little or no prior notice, and are taken away from their schools and communities in which they have settled.
- Though we are fully committed to providing services to people placed in both dispersal and contingency accommodation, funding to do so is insufficient and places additional pressures on council resources at a time that councils are experiencing higher demand for services, inflationary pressures and staff shortages. We note that 'New Burdens' assessment for dispersal bedspaces is yet to be completed.
- Current safeguarding practice is not fit for purpose, especially in contingency hotels.
- We have serious concerns about the so-called 'Maximisation Policy' and the impact of this on people's welfare, safety and wellbeing.
- We do not believe that removing vital safety regulation from dispersal sites is an appropriate way of rising to the challenge of procuring new bedspaces. HMO (House in Multiple Occupation) licensing is there to guarantee minimum standards in terms of quality of accommodation and removing these poses risks to the welfare of residents.
- We are experiencing competition with Home Office contractors in procuring homelessness accommodation.
- We believe that barges, disused barracks, tents and other unusual types of accommodation pose a serious risk to the welfare of vulnerable individuals and the wider community.
- Overall, we are concerned about an already pressured system and overstretched local government services and other statutory services including education, care and healthcare.

We kindly request that you consider the following:

- Funding for both dispersal and contingency accommodation needs to be aligned and considered in line with New Burdens Assessments to allow local authorities and their partners to do long term planning and to have flexibility to channel funding to services that are most needed/pressured in the specific local context.
- Withdraw the statutory instrument on changes to HMO licensing given the concerns about the impact they would have on safety.
- Improve engagement between Local Authorities and the Home Office (and its contractors).
- Improve data sharing procedures between the Home Office, its housing providers, LAs and other local stakeholders to enable appropriate support to be put in place in a timely fashion.
- Councils would welcome the opportunity to work with Home Office and its contractors to develop effective procedures around safeguarding and to ensure all relevant parties including hotel staff are equipped to make appropriate referrals.
- We would welcome further conversations with government as to alternatives to Maximisation/Optimisation policies including stepping up additional hotel sites so as to limit room sharing and overcrowding.
- We would welcome further conversations with Home Office contractors around limiting competition in the housing market.

A handwritten signature in dark ink, appearing to read 'Rosie Tapsfield', with a horizontal line underneath.

Rosie Tapsfield,  
Chair of the City of Sanctuary Local Authority Network