



Response Form – Cap on Safe and Legal Routes Consultation

About you

Full name	Janet Sharpe
Job title or capacity in which you are responding to this consultation exercise	Director of Housing
Local authority (or equivalent) represented	Sheffield City Council
Date	9 th January 2024
Postcode	S1 2HH



Responses

Ahead of responding, please familiarise yourself with the consultation paper, with particular regard to the “Instructions for completing the questionnaire” section.

Question	Response
----------	----------



Q1: What organisations (including VCS organisations, and community sponsorship groups) in your area have you engaged with while compiling your response and have you included the responses received from these organisations in your local authority consolidated response?

Page 105

We have consulted with Migration Yorkshire who arranged region wide consultation meetings with Local Authorities, Heath colleagues and VCS which Sheffield attended. Within Sheffield we have consulted with the following partners who support those seeking sanctuary in Sheffield, including refugees and asylum seekers:

Sheffield City Council:

- Housing and Neighbourhood Services
- Education (e.g. admissions)
- Community Development
- Community Safety Team
- Adult Social Care
- Childrens Social Care
- Early Years

Voluntary, Community & Faith Sector:

- City of Sanctuary Sheffield
- Shelter
- Voluntary Action Sheffield
- Refugee Council

Health:

- Mulberry Practice

Each have been asked to respond, both to specific questions, where possible as well as providing wider information and/or evidence pertinent to this consultation. Their responses have been incorporated into this submission.

Sheffield City Council wishes to highlight the wider impact of migration into the city and, these responses. The questions asked as part of this consultation involve wider city pressures that we have experienced due to the number of asylum placements, positive asylum decisions, UK and Afghan Resettlement Programmes, the Homes for Ukraine Family & Re-settlement Programme and supporting immigration



from Hong Kong alongside our normal UK Resettlement Programmes and planned refugee arrivals. Sheffield City Council is facing significant pressures across all statutory services due to the significant increases in Homeless presentations, impact of a lack of suitable affordable housing and, streamlined asylum process which is also placing more pressure on our existing community infrastructure that is in place to support new arrivals into the city. There are three areas where I think we need to consider the impact of wider migration when thinking about the numbers of asylum-seeking people that Sheffield may commit to welcoming. Sheffield remains and is a welcoming city and, City of Sanctuary but there is also a capacity issue and the numbers that the city can support at any one time.

Sheffield has a large number of people moving to it from within the UK each year. Many of these are students whose numbers are known but many are people moving to work who are often not known to statutory services until they arrive and require a service. In some cases this can mean significant demand for front line services, such as school places and healthcare. For example, we are aware of ongoing movement of Roma communities between Cardiff, Luton, Peterborough and Sheffield, often driven by the promise of work which can lead to large extended families moving into the city.

When the EU Settlement Scheme first started many years ago the Home Office estimated that Sheffield had 27,000 EU citizens resident but at the last count over 43,500 people had registered under the scheme in Sheffield, an increase of over 60%. This means that the burden on services will be 60% more than predicted too.

The 2021 census statistics for Roma people has just been published. These estimate that Sheffield has 2,700 Roma people yet we know from our work registering people for EUSS that there are over 10,000 Roma people in Sheffield. This means that if census data is used to predict demand on statutory services, then those services will not be able to cope with the demands placed on them. According to the census data over 50% of Sheffield's Roma community are under 20 years old, for example, which means that we need to provide services targeted at that age group but at a much larger scale than the census suggests.



So, when considering what cap Sheffield should consider those arriving through safe & legal routes and, we need to consider the impact of wider migration as this will affect the level of support & welcome that the city is able to provide.

We have consulted with our direct Refugee resettlement partners, Education, Health and Refugee Council. All organisations are under significant pressure in the city. The number of additional asylum arrivals and asylum positive decisions and arrivals through the Hong Kong and Ukraine programmes has placed significant pressure on Health, Housing and Education. All organisations have indicated a willingness to continue refugee resettlement in the city at current levels. The Mulberry Health Clinic who provide initial health screening and support to newly arriving refugees and asylum seekers have requested further funding from the authority in order to support the current numbers.

Along with the Housing Team, Refugee Council are reporting an increased amount of expectation and support being required by more recent refugee arrivals than previous Gateway arrivals. The amount of wraparound support being required by each case has increased significantly. Both teams are however happy to continue to support the current level of refugees being resettled into the city.

It has also been highlighted how difficult it is to commit to this figure in future based on the current position especially by services impacted by asylum numbers and increased asylum decisions. All the services providing to refugees are being fully stretched by other issues and the omission of those pressures from this consultation makes any response difficult in terms of accurate and strategic planning.

Levels of crime and anti-social behaviour in Sheffield are not significantly different to those experienced by other core cities, nor by the other local authority areas in South Yorkshire. We have a very active community safety partnership which provides strategic direction for all our crime and disorder reduction related activities, as well as monitoring levels of ASB and crime. The city has a well-developed structure for dealing with organised crime and criminal exploitation, particularly insofar as the protection of vulnerable people and communities is concerned.



Q2: What is your capacity to house and support those coming through safe and legal routes under the cap in calendar year 2025?

88 individuals

This figure was originally used in the last couple of years as it represents a **fair share** of 10,000 refugee arrivals to the UK each year when comparing the Sheffield population to the national population.

This still does not recognise the significant pressures faced by Sheffield City Council in terms of identifying suitable accommodation. There is a significant shortage of suitable affordable housing in the city with a shortfall of 902 homes per year. In addition to this the city faces unprecedented demand for social housing. The City like many other major cities is struggling to identify homes, we are currently heavily dependent on B&B and Hotel Accommodation to meet our legal Housing duties which is resulting in a £5m annual pressure on our Housing General Fund as a result of Housing Benefit Subsidy Loss rules. When considering losses through use of supported Exempt accommodation this increases to £8.4m. Homelessness is increasing across the country putting more pressure on available accommodation and this is expected to increase further over the next few years.

To go beyond our 'fair share' will be difficult to achieve given the significant accommodation pressures, it also needs to be recognised even within existing numbers we will see more refugees receiving positive asylum decisions living in hotel and B&B accommodation to support their housing needs for some time rather than finding permanent homes. We are committed to support our fair share but it needs to be recognised the significant pressure this is placing on an already broken housing system.

We will continue to work with our Registered Providers (RP's) and Private Sector landlords to help free up additional accommodation where this is possible.

An example of the pressures being faced each week: We receive around 5,800 housing bids on our CBL system each week for 40 properties. This creates significant pressure for our Housing Solutions and Rehousing Teams supporting households who cannot access accommodation. The average stay for those in TA/Emergency Accommodation for families is around 5 months and, around 6 months for single people. For any household requiring a 4 bedroomed property for anywhere in the city this can lead to a wait of over 2 years. Each month we have around 450 new applications to join the Housing Register for Social Housing. Further details can be found below.



Q3: What evidence can you provide to support this (for example, number of properties that you have available or can procure)?

It is very difficult to provide evidence to support this in the current housing situation. We have unprecedented numbers of cases in emergency temporary accommodation and hotels which have risen dramatically in the last few years. The pressure from increased asylum numbers and increased positive decisions, new refugee cohorts such as Hong Kong and Ukraine, and increased homelessness have placed the city's housing and support services under immense pressure.

There is a shortage of affordable housing in Sheffield with increased pressure from:

- More households in unsuitable housing
- More overcrowding
- Fewer households can afford private rented or to buy housing on the open market
- Increased homelessness
- Projected increasing right to buy sales
- Lower turnover of social housing
- Reduced supply of new affordable homes of the right type and mix

12% (25,891) of households said their property was not adequate for their needs as part of Strategic Housing Market Assessment 2019.

House prices in Sheffield are 6.2 times the average household income, (data from ONS 2022 House price to workplace-based earnings ratio).



Homelessness

	22/23		23/24	
			Q1	Q2
Homeless Reduction Act				
Presentations	3,964		937	1,119
<i>Threatened with homelessness within 56 days, prevent duty owed</i>	991		295	362
	25%	50%	31%	32%
<i>Already homeless, relief duty owed</i>	2,829		625	733
	71%	45%	67%	66%
<i>No duty owed</i>	144		17	24
	4%	5%	2%	2%

- We have an average of 40 people attending Howden House each day to discuss homelessness. We also receive an average of 84 calls into the service each day from households in emergency housing need
- We have an average of 13 refugees presenting at Howden House each week following a positive decision due to increase due to SAP
- We have a backlog of 672 cases currently
- The average caseload for officers in Housing Solutions is 66 per officer so we cannot allocate all of the backlog to them if we did this would result in caseloads per officer to over 100. The recommendation from DLUHC is 40 per officer

Temporary Accommodation - Stats

- Currently there are 695 households in emergency accommodation
- There are 369 households in SCC Temporary Accommodation, 128 singles and 255 families
- There are 312 households in hotel provision, 254 singles and 58 families



- In October 2019 there were 114 households in emergency provision.
- The emergency housing provision provided in the city has grown by 600% in 4 years
- The average length of stay in emergency TA accommodation is 162 days

Rehousing - Stats

- Currently there are 23115 households registered. Out of these 13,738 have placed at least one bid in the last 12 months.
- The register is now growing again with a net increase of 100 households per month.
- We validate 450 new applications every month.
- There are 985 households with a priority awarded to them. Many of these are owed a duty by the council to help them secure accommodation.
- We advertise an average of 40 properties a week.
- The average number of bids per property is 130.
- The average waiting time for those in Bands A-C is now in excess of 6 months. For a 4bed it is over 2 years.
- The average number of bids per week is now 5800 We have provided for an arrival figure of over 88 individuals for many years and since the Afghan schemes and Homes for Ukraine scheme have settled on a target number of refugees of 88 which was met in 22/23 and should be met in 23/24. It is likely this target could be difficult to achieve in 2025 as the demand on our homeless services is increasing.

The Local Authority Housing Fund (LAHF) funding we have secured has helped to bring in £5.5m in approved funding for the acquisition of new homes. The Strategy and Resources Committee approved the receipt of this grant funding and the use of £5.5m from our Stock Improvement Programme Capital Fund allowing £11m in resources for the acquisitions of new homes to support refugees. Year 1 of the LAHF fund is nearly completed with year 2 is currently with a target completing of 30th June 2024. It is likely this funding will result in the purchase of 75 homes for authority use. More funding and initiatives like this are essential as it is impossible to keep up with the demand for emergency housing in the city by



	<p>using current social housing stock. Accessing the private rented sector is also becoming increasingly difficult as private rents increase way beyond the Local Housing Allowance rates in most areas.</p> <p>We do recognise there are other ways to address the shortage of accommodation issue and we are actively exploring new ways of securing accommodation including some of the best practice from Ukraine re-settlement, leasing and hosting arrangements alongside improving advice to applicants to help them find their own accommodation.</p>
<p>Q4: Of the above number, in 2025, how many of the following groups do you anticipate being able to accommodate, and ensure appropriate support is in place for:</p>	<ul style="list-style-type: none">a. Complex Cases:b. Single peoplec. Large families <p>We have always tried to help with larger families and complex cases. This has historically been completed by the Refugee Housing Team alerting the Home Office when we have secured housing for these groups and then arranging to receive a case in need or a small flat or large or adapted house. It is impossible to put a figure on this as it is a case of what accommodation we can find at the time. Relationships with the Home Office team are good and we have worked well together in meeting these needs. LA's like Sheffield need more time to plan for supporting families and individuals with complex needs as this often requires multi-agency support and this takes time to put in place.</p> <p>Sheffield will continue to liaise with Education, Health, Social Care and other agencies to support arrivals with complex needs, single people and larger families. We do feel it is essential accommodation is secured for cases with additional and specific needs before we can expand multi agency worker and commit to arrival numbers.</p>



<p>Q5: Of the above number, how many of these do you expect to come through the community sponsorship scheme in your area?</p>	<p>Over the past three years two families have arrived at two separate sponsor groups. Sponsor groups have tended to provide for one family. We have provided a figure we feel we can achieve accommodation and services for. Should that figure include a sponsor arrival we would utilise their accommodation offer but remain at the 88 target as other services have pledged to provide for 88 individuals.</p> <p>We do not anticipate that Community Sponsorship will provide additional capacity, it may relieve short term pressure on finding suitable accommodation but will not address the significant shortage of accommodation overall.</p>
<p>Q6: The Resettlement Tariff and Community Sponsorship Funding provide the local authority with access to central funding for the purpose of supporting refugee integration. What impact has this funding had on your ability to resettle refugees in your area?</p>	<p>The funding has been crucial in being able to coordinate support to help refugees resettle. The flexibility of the funding has helped the authority provide additional funding in areas and for services who have been struggling with all arrivals to the city. It is welcomed that the funding instruction is in place allowing a wider impact to refugee communities that the stringent rules previously applied to the Gateway. A continued flexible approach to allowing authorities to spend the funding as needed to benefit all resettlement is essential.</p>



Q7: There is no additional funding being introduced with the cap. How could the funding instructions be changed to maximise the existing funding, enabling innovation and increased delivery of services in your area?

Page 114

It would be helpful for the funding instructions to confirm the funding is awarded per arrival and that no clawback or time limitations are applied to the funding so the authority can have flexibility to plan support for all ongoing refugee resettlement and areas of significant pressure in the city. It would be helpful if this could be supported for previous refugee resettlement funding instructions.

It would also be helpful alongside the revenue funding that this is supplemented with longer-term capital support for the provision of new homes, acquiring homes and, entering into long-term leasing arrangements with the private sector to increase the numbers of suitable accommodation available and, especially where special needs or supported housing accommodation is required.

Further capital and grant support is needed from the government to mitigate the financial pressures the local authority is facing from housing benefit subsidy loss and wider impacts from a shortfall in available and affordable housing. The additional pressures from the number of additional asylum arrivals and asylum positive decision cases needing accommodation as well as arrivals through the Hong Kong and Ukraine programmes on top of a substantial post covid increase in homeless presentations means the authority is under significant financial pressure. The increased costs to support emergency and short term housing as a result of these factors are being met by the local authority which is in need of more financial help. Due to shortages in longer term secure accommodation there has been a six fold increase to well over 600 households in emergency and short term accommodation.



Q8: What impact do you assess the local provision of public services such as education, social care (adult and children) and healthcare has on your ability to resettle refugees in your area? Why do you assess this to be the case?

Page 115

Impact of inward migration

The ability of the city to respond to demand created through refugee pathways has to be considered in the context of all those arriving in Sheffield, whether through inward migration or otherwise. Regardless of route of entry, the impact on service demand is likely to be similar.

In this, predicting ability to manage demand is therefore challenging.

Sheffield has a large number of people moving to it from within the UK each year.

This comprises of students along with those moving for work or personal reasons. This type of migration is uncontrolled since it is self-selecting and for those with citizenship right to remain, work or study, the city has no oversight of arrivals, often until a statutory service is required.

This impacts service demand for example in school places and healthcare.

Accuracy of 'known population' data

There is inherent challenge in the use of census data to predict demand on statutory services.

The examples highlighted emphasise the inherent difficulty in predicting, with confidence the ability of the city to respond to any migrant cohort, regardless of route of entry.

Services accessed by those arriving through refugee pathways are universal. Furthermore, many services are accessible to those without settled status, such as those seeking asylum.

For example, education, health and social care are universally accessible. It is therefore difficult to disaggregate the impact of those arriving via a refugee pathway and therefore attribute a number to those arriving via this route, when people arrive to Sheffield by a variety of routes, inward and otherwise, all placing demand on the same, or many of the same services.

Without discussion about wider funding e.g. Early Years, Housing etc, the number in respect of this consultation will by necessity, be limited.



Many of those arriving via refugee pathways, are, by definition dealing with significant trauma. Written and spoken language is often a barrier. Inclusive support matters. Consequently, the impact of interpretation and translation is a significant consideration, along with provision of a trauma informed approach e.g. housing assessment and trauma informed spaces and places as well as staff to ensure appropriate provision for new arrivals is in place.

The mandatory national transfer scheme will result in a growth in numbers of around 70+ young people a year.

When planning for Caps on safe and legal routes this needs to be factored in.

Information and Analysis

Since 15/2/2022, local authorities have been mandated to accept UASC under the National Transfer Scheme, resulting in a significant growth in the number of Young Refugees looked after by Sheffield. The size of the current this population is now presenting an unprecedented and growing challenge to existing resources and organisational arrangements.

As of 12/07/2023 The Children Looked After Service and Leaving Care Service support a total of 178 unaccompanied young refugees, compared to 84 young refugees in 2020.

Approximately 150 are 16 - 25 who are eligible for Leaving Care support.

In addition, we have around **14 children** who are under 16 or have not yet been in care for 13 weeks so don't meet the leaving care criteria. (11 children).

Currently young people who become "eligible" are allocated a worker from the Leaving Care Service as a Personal Advisor. Currently over 50 young people under 18 are allocated both a social worker and a leaving care worker for support.

Current and Future Challenges



Children who are supported by Sheffield City Council as unaccompanied refugees have a range of specific and often complex needs.

The significant increase in unaccompanied asylum seekers is putting a strain on the current social work services and related children's services - there is an immediate need to respond to this strain.

Expertise and capacity needs building to respond competently and consistently to the growing demand for managing complex legal situation; age assessments, human rights assessments and decision-making regarding support for young people whose claim for asylum has failed.

The recent change to patterns of young people seeking asylum is resulting in an increasing number of young people being refused refugee status. For example, over 50% of young Albanians seeking asylum are refused. In Sheffield, we are starting to see growing evidence of young people presenting to us who have been trafficked/criminally exploited.

Pending legislation changes and national policy development add to the complexity of the work in this area and are demanding increasing specialist knowledge.

The no recourse to public funds team supports families from all over world including Europe where they are living here with children but are not able to support themselves. We therefore have to provide and pay for private rented accommodation. This is expensive and can be hard to find good quality accommodation. Some of these families are from European countries where there are no concerns about their safety etc but because of Brexit they cannot claim benefits. However for some they want to remain in the UK and we fund them because there are children. This has never been funded from central government and places a huge strain on local housing, interpreters. We do appear to be able to get school places and they are able to register with GPs.

For other families they are in an appeal process and the same pressures around housing etc exist for them as well.

Childrens Services highlighted that since 15/2/2022, local authorities have been mandated to accept UASC under the National Transfer Scheme, resulting in a significant growth in the number of Young Refugees



looked after by Sheffield. The size of the current this population is now presenting an unprecedented and growing challenge to existing resources and organisational arrangements.

The Education service are facing constant demand for school places:

Variable Factors impacting demand for school places

Place planning is a complex process, influenced by demographics, mobility, and housing yield, as well as parental preference, geography, travel, and transport. Twice yearly reviews of population data and the tracking of live school applications, as well as dialogue with neighbouring authorities, help to manage the risks associated with these variables.

The Council's Strategic Vision for the City Centre published in January 2022 sets out that, although births are falling, the Sheffield population is set to increase from 584,853 people (2019) to 648,410 people by 2043, as it attracts new residents. To help meet this growing population, there is an aspiration and Government target to deliver new homes in the city. The Council agreed its preferred spatial option for the Local Plan in February 2022 and we are expecting to deliver 2,100 homes a year. The Council is monitoring the additional pupil yield that these new housing developments are likely to produce and is planning to factor this into its forecasts for school places.

How do we forecast future pupil numbers?

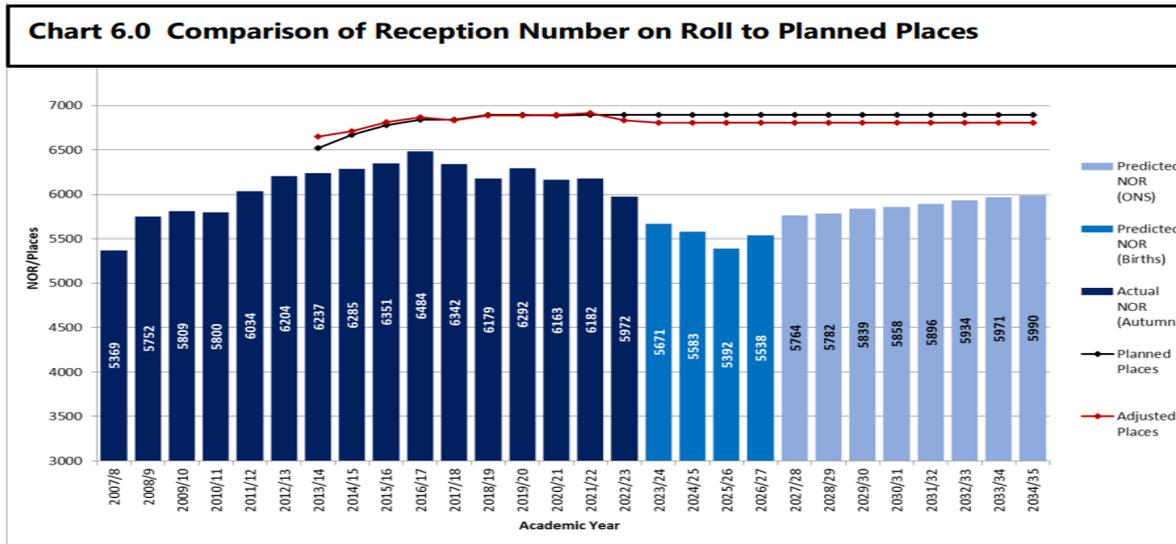
The Council plans to use the actual allocations data from 2023/24 alongside the suite of other forecasting tools to project future demand across the city and within the planning areas. More detailed forecasts are then produced for each school, adding in factors such as preferencing data and inward and outward migration data. Office for National Statistics population forecasts are used to extend the range of years forecasted, but these longer-term projections are viewed with caution and serve only as an indicator.

What is our data telling us?

Reception Places There are currently around 6,900 reception places available across Sheffield. As births in Sheffield rose by 25% between 2002 and 2012 there was a period of expansion and school places were added in the areas of pressure to meet demand as 1,000 more children per year came into



reception. Subsequently as births have fallen there has been a growing number of surplus places across the city. Chart 6.0 below shows Number On Roll forecasts for reception compared to the number of reception places available.

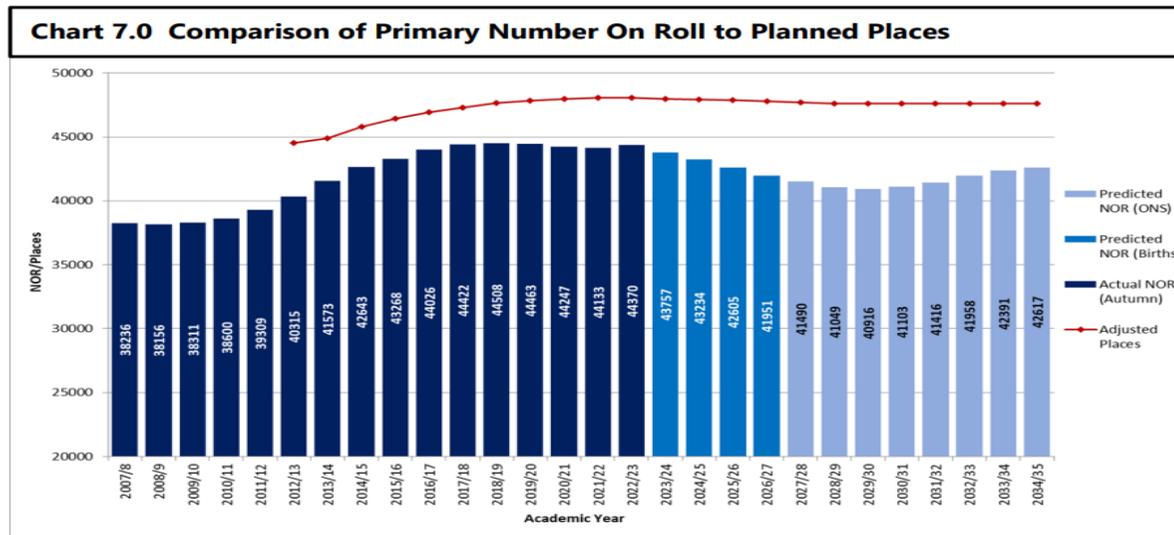


Figures from 2023/24-2026/27 are predictions based on known births. 2025/26 is expected to be the lowest reception cohort with 5392 pupils forecast to be on roll within school citywide (demand) against significantly higher number of places (supply). From 2027/28 predicted Numbers On Roll are based on birth forecasts provided by the Office of National Statistics and should be treated with caution. They suggest that births will remain low to the end of the decade. Please note, although citywide surplus places within primary schools are forecast, deficits are still forecast within specific planning areas as demand is not evenly distributed across the city.

Chart 7.0 below shows the citywide forecast for primary school pupils across all year groups reception to Year 6, compared to number of places shown by the red line. If, as Office for National Statistics forecasts



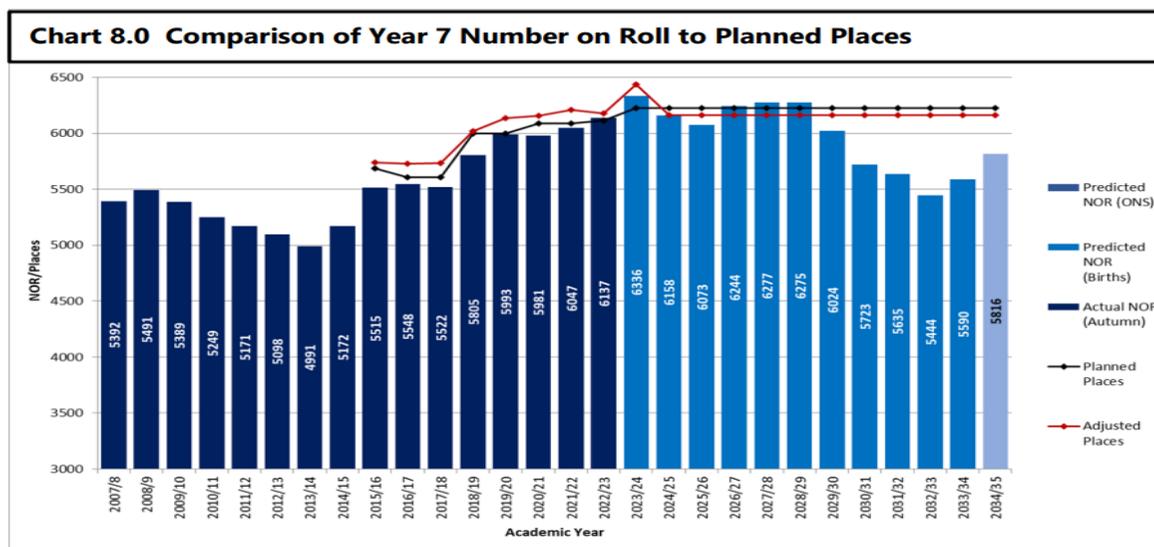
suggest, 2025/26 is the low point for reception intake and numbers grow only slightly to the end of the decade, 2029/30 will see the highest level of surplus places across the primary population



Secondary Sufficiency Chart 8.0. Below compares the demand (number of actual Year 7 pupils needing a place) against the supply (the number of planned Year 7 places available). Previous high numbers of pupils in primary schools are now being reflected in rising Year 7 secondary school intakes. The current citywide picture for secondary school places forecasts a citywide deficit of places between 2023-2028, reaching an initial peak in 2023/24 and two further peaks in 2027/28 and 2028/29. In 2025/26, demand for Y7 places is forecast to be 6073 pupils with very limited surplus supply within the system citywide. Secondary schools in Sheffield are at capacity. Demand for places is forecast to be highest in Planning Area 1 (southwest), Planning Area 5 (northeast) and Planning Area 7 (south). There is a pressure on secondary school places from local children who live within these catchment areas, and this is forecast to continue until the end of the decade. The schools in the southwest of the city are already operating at, or above, their capacities and forecast suggest that some schools in the southwest are



unable to meet the demand from their school’s catchment. Demand is not distributed evenly across the city and some areas will experience falling rolls and surplus places will begin to develop.



Demand is rising for Special Educational Needs and Disabilities places and is forecast to continue to rise, driven primarily by pupils with Autism Spectrum Disorder and those with Social, Emotional and Mental Health needs. From a mainstream perspective, in order to meet this rising demand, the Council’s intention is to provide better mainstream inclusion. Delivering this requires innovation, recognising the challenges, and working in partnership with our localities, schools, academy trusts and other key stakeholders.

FACES are involved in the support of adult learners who arrive in the city, both on our main courses or as a discreet group of resettlement learners.

The main challenge that exists for adult learning is capacity to offer ESOL to those who require it given the high levels of demand at present. At our termly ESOL Forum meeting next Monday we will be



discussing this challenge with key partners to try and further develop our working arrangements between providers.

Funding for ESOL learners who arrive in Sheffield through the resettlement scheme comes from the DWP rather than ESFA. As we claim funding based on the number of learners we teach we could in theory increase our supply of teaching time (through recruitment of tutors) in response to growing or changing numbers, using the increased funding they would draw down.

In summary, notwithstanding the challenges with current levels of demand, the resettlement programme and the way that ESOL provision is funded allows us some flexibility, assuming we can recruit tutors and work with partner organisations to increase teaching capacity for adult learners.

Migration Yorkshire hosted a meeting of all health leads across the Yorkshire and Humberside District. It was agreed the main health perspectives to feedback were:

- o There are challenges from a system perspective are around the workforce - people with specialist knowledge and having the relevant skill sets.
- o Being registered with a GP doesn't mean that all the health needs can be addressed.
- o Impact on people who are potentially coming through other routes. If there's no financial support for these individuals how will this be managed.
- o Concerns about the requirements of mental health provision. Needs are specific and don't fit in to mainstream mental health services.
- o Issues about health literacy and people not knowing how to navigate the health care system.
- o Being asked to consult in such a short period of time things can change rapidly. It is hard to predict how 2025 will look like and the position the NHS will be in given the situation for winter 23/24 is currently uncertain.



[Redacted]

[Redacted]

We have also included below concerns from two of our VCS partners in appendix A.

Thank you for participating in this consultation.

Please send your response by midnight on 15 December 2023 to: capconsultation@homeoffice.gov.uk – this has now been extended to 9th

January, 2024

Page 123

Appendix A

We have also included below concerns from two of our VCS partners:

A: Concerns about the structure of the safe routes cap consultation

It is the right thing for the Government to engage with local authorities on planning for future safe routes and resettlement for people coming to the UK. Local authorities are vital in supporting those who arrive in the UK under resettlement schemes. However, it is clear that there is nothing in the design of the safe routes consultation that will achieve an ambitious target for future resettlement and safe routes.

The decision to turn the consultation private between the government and local authorities has not only restricted the dialogue and opportunity for expertise in VCS to be able to feed in constructive and practical information from a policy perspective, it also has put a very high burden on local authorities who are required to individually commit to numbers of refugees to support within only eight weeks.



The time frame of eight weeks is far too short for any meaningful response by local authorities, it restricts an opportunity to consult across sectors in a meaningful way and to think innovatively about future solutions to resettling a higher number of refugees. The safe routes cap only requires a pledge on numbers for one year, this approach limits local authorities' abilities to plan long term in building expertise and capacity.

In the arrangement of this consultation, the Government has failed to include any certainty around funding for local authorities as well as any material on short- or long-term solutions to the urgent housing pressures that are faced by councils. The questions in the consultation document are restrictive and designed solely at eliciting numbers from local authorities, there is no room to hear from councils on their views of what positive resettlement should look like in terms of future durable solutions. It is worsened by the FAQ document strongly suggesting that the Home Office will expect local authorities to be able to fulfil any pledges. Given the current issues around move-on, many councils fear being ambitious with pledges. The lack of central government ambition risks many councils not engaging with the consultation or responding with very small pledges due to reputational risk on local authorities if numbers are not met.

What the safe routes consultation should look like

The consultation would be far more beneficial if it had a wider overarching ambition. It should be held over a longer period of time and be open to a larger range of stakeholders for broader engagement. This would have resulted in more joined up thinking that moves away from a restrictive place-based approach, it would have allowed for a vital policy perspective to be incorporated which would have given the opportunity to develop strategies on how to assist local authorities with opening up housing stock for refugees.

The consultation fails to recognise cumulative pressures on local services, the Government should have included proper certainty on funding to ensure councils are adequately supported.

The cap should be for five years, this would have allowed local authorities, communities and support organisations to plan ahead, to build expertise and capacity to determine how people can be distributed across country in fair and equitable way.

What resettlement should look like

National resettlement target

- The UK government needs to increase the number of refugees being resettled in the UK by creating a national comprehensive refugee resettlement programme that sets an ambitious target over 5 years.



- The new national target should work with an initial assessment made locally by UNHCR maximising the existing global UK Resettlement Scheme which should be open to all nationalities, the initial assessment should be based on a criteria of vulnerability in order to ensure the most vulnerable are resettled swiftly.
- Once a national target for resettlement has been set, this figure should be broken down to what it would mean at constituency level. There would also need to be full consultation with the Devolved Administrations, SMPs and Local Authorities.

National refugee strategy:

- A new resettlement strategy would sit under a national refugee strategy, where instead of running multiple schemes – such as asylum dispersal, the UK Resettlement Scheme, the Afghan and Ukraine schemes and Hong Kong (BNO) scheme – each with different funding structures and housing requirements, there should be one overarching strategy.
- The national refugee strategy should be supported by a national refugee support and integration strategy, with a dedicated minister in the Cabinet Office.

Housing solutions

- Housing strategies must be thought of holistically in the wider picture of integration.
- A national refugee strategy would galvanise thinking between departments to coordinate housing issues across all local authorities to understand what the needs are for all refugees of concern. This should include the Government supporting and facilitating a multi sector approach to housing solutions which would involve funding opportunities for a broad range of players including local authorities, the private sector, community sponsorship groups in order to open up more housing stock.
- The various ways that housing stock could be opened to refugees and people seeking asylum include:
 - Looking at housing issues in the round to balance refugee housing issues with wider homelessness and housing demand pressures being faced by LA's
 - Providing people with a longer time in home office accommodation after decisions to enable homelessness prevention work to be undertaken
 - Utilising local authority funding (LAF) in creative ways to take housing intended for private sale back into council housing stock dedicated for refugees. This stock becomes additional therefore is not creating pressure on wider housing.
 - Learning lessons from the LAF which should have longer timescales that will allow for more acquisition and new supply
 - Renovation of derelict buildings
 - Promote access to affordable housing: seek out partnerships with faith groups, churches, groups/individuals who hold housing stock and address the subsidy loss impact
 - Regulate the Supported Exempt Accommodation use and change the housing benefit caps that cause loss significant loss to the Council
 - Facilitating access to the private housing market by developing partnerships with the private sector providers to address the issues they see as barriers



- Review the impact on RTB on LA's that is resulting in an overall net loss of homes available for lettings for a period until homeless and housing demand numbers stabilise maybe taking into account areas in the country with significant housing demand pressures.

B:

We should not be focussing on a numerical target. Targets such as these are repeatedly shown to inadequate and inaccurate. Rather, we should focus on how society is structured to enable people arriving in the UK to rebuild their lives and become part of our society.

We seem capable of doing this for the huge number of people coming on work visas to fill roles in our NHS and other key sectors. In the year ending March 2023 work visas were up around 61% to 300,000, and that is before dependants are counted. This is a far higher number than the number of people arriving through the resettlement route or claiming asylum.

Once people gain refugee status or arrive with refugee status, they are, to all intents and purposes, in the same category as those arriving on a work visa. Perhaps they are even more rooted to the UK as they now have a right to stay that is not tied to maintaining a job. As such we must support them to access jobs, find housing and begin to become part of the fabric of society.

So, rather than focus on an arbitrary number, central government should focus on providing the conditions for someone to get on with their life in the UK. The most impactful thing that central government can do in this regard would be:

- to provide certainty on the funding local authorities will receive and to ensure it is of sufficient size to meet the need arising
- to provide well thought through and sustainable short and long term solutions to the housing crisis

I also would like to add that the arrangement and set up of the consultation is woefully inadequate and, as stated by the Refugee Council, seems to be 'designed solely at eliciting numbers from local authorities' with 'no room to hear from councils on their views of what positive resettlement should look like in terms of future sustainable solutions.' Tom Martin, Director - City of Sanctuary Sheffield.