

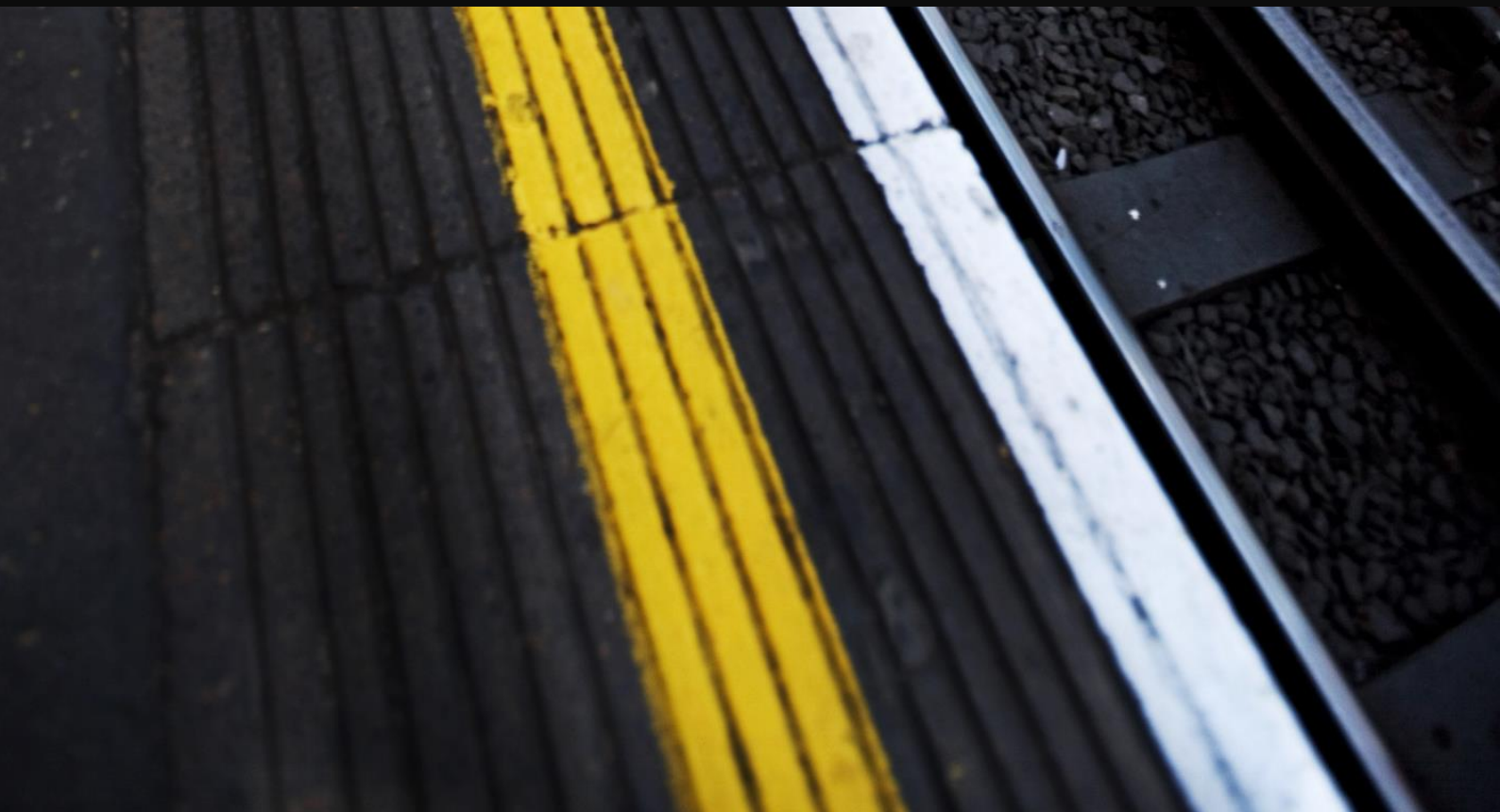


# On the frontline

London councils' responses to the humanitarian crisis in  
Ukraine

10 January 2023

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# 1 EXECUTIVE SUMMARY

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Local authorities have been at the forefront of the UK's response to the humanitarian crisis in Ukraine. Tasked with managing arrivals, but also with supporting refugees through the long-term challenge of establishing independent livelihoods in the UK, councils across the country have been given a momentous task. And yet, despite their central role in refugee integration, local authorities have received little focused attention. Ten months after the Ukraine visa schemes were introduced, we are yet to have an in-depth account of what worked, what didn't, and how the UK can better respond to future humanitarian crises.

In this report, we examine London councils' response to Ukrainian refugees. Drawing on in-depth interviews with response teams from 12 different areas in London, which between them oversaw 36% of Homes for Ukraine Scheme arrivals in the capital, we find that while thousands of Ukrainians and their family members have taken the first step to safety in the UK, the UK's response suffered from significant limitations.

**FINDINGS.** In the short term, councils revealed several issues which merit urgent attention.

- The absence of a data validation mechanism had left the sponsor registration system open to abuse, and local authorities pressured to spend precious time conducting checks for properties that never existed in the first place.
- Poor communication between central and local government meant that, on many occasions, the Home Office approved visas long before councils got to conduct any sponsor checks, leaving Ukrainian families vulnerable to exploitation.
- The government's inexplicable insistence to financially support Ukrainians under one visa scheme, but not others, had left councils frustrated, and Ukrainian refugees under the Family Scheme more vulnerable to homelessness.

In addition to the hurdles that hindered everyday delivery, councils made it clear that, for refugee integration to work in the long-term, central government needs to tackle long-standing structural challenges, which are particularly deep in London.

- A deficit of affordable housing risks leaving Ukrainian, Afghan, but also a generation of low-income Londoners at risk of homelessness and social immobility.
- The absence of direction from central government meant that key decisions about how to support refugees into the private rented sector were left to individual local authorities, leading to a patchwork of responses.

**RECOMMENDATIONS.** To address these issues, our interviewees were clear. Central government needs to commit to developing:

- A strategy for refugee integration, which moves beyond short-term, scheme-based responses, and the inconsistencies they create in the support received by different groups of refugees.
- A strategy for housing, which addresses the huge deficit of affordable housing stock, and the lasting damage caused by homelessness.

## 2 INTRODUCTION

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As Russia presses on with its full-scale invasion of Ukraine, causing civilian casualties, the destruction of infrastructure, and forcing people to flee their homes, the humanitarian crisis unleashed continues to test the resilience of Ukrainians and the robustness of refugee integration programs around the world.

According to UNHCR statistics from November 2022, more than 7.8 million Ukrainian refugees<sup>1</sup> were recorded across Europe, with 4.7 million formally registered for temporary protection or similar national protection schemes.<sup>2</sup> Most of them were registered in neighbouring countries, including 1.5 million in Poland, and almost half a million in the Czech Republic. Many others found protection across the continent, notably in Germany, which welcomed over 1 million refugees, followed at some considerable distance by Spain, Italy, and the UK, who welcomed around 150,000 refugees each.

As of 22 December 2022, a total of 152,200 Ukrainians have arrived in the UK,<sup>3</sup> and over 14,900 have arrived in London under the Homes for Ukraine Scheme since the outbreak of the war in February 2022.<sup>4</sup> Adopted gradually in response to public support, the Ukraine Family Scheme, the Homes for Ukraine Scheme, and the Ukraine Extension Scheme were in many ways reported as a success. A large volume of visa applications were processed under the schemes at a time when, by comparison, the asylum system is crippled by a growing backlog and year-long delays. Successful applicants, which can include Ukrainian nationals and specific family members of any nationality, are given the right to stay in the UK for a current period of three years, as well as the right to work, study and claim means-tested benefits. And yet, the Ukraine schemes also suffer from significant limitations.

In our previous report we found that, by design, the fact that the schemes are open only to Ukrainians and their close family members excludes as many as 450,000 people who ordinarily reside in Ukraine but lack Ukrainian citizenship.<sup>5</sup> Similarly, the schemes shut out Ukrainians who had been living in the UK without a valid immigration status, even though they too are affected by the Russian invasion. Serious limitations are also inherent in the schemes' implementation. Only one of the three schemes, namely Homes for Ukraine, offers direct financial support for refugees, hosts, and local authorities, even though in practice the needs of Ukrainians with status under the Family or Extension Schemes are similar, if not more acute.

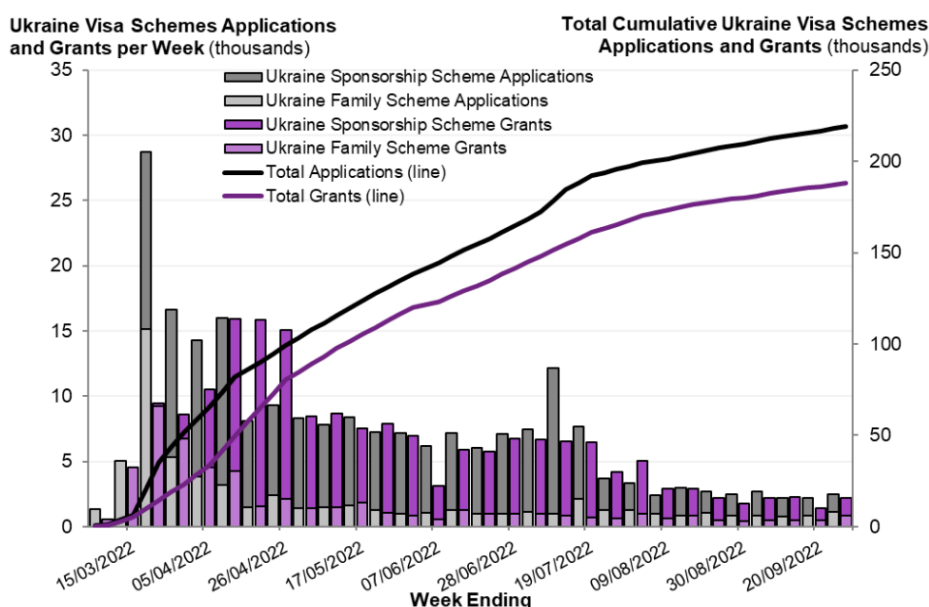
The disparity in scheme funding is indicative of a wider problem with the UK government's response to the humanitarian crisis. Piecemeal, fragmented, and developed in response to public pressure, the UK's approach to Ukraine left the momentous task of refugee integration to civil society, and to a local government sector which has already been overstretched by years of austerity.

In this report, we examine the UK's response to the humanitarian crisis in Ukraine by delving into local authorities' experiences. Councils have been key to the delivery of the three Ukraine schemes, in particular, the Homes for Ukraine Scheme. In exchange for a tariff of £10,500 per guest, initially, then £5,900 from January 2023, they have to assess the suitability of prospective sponsors, administer funding to hosts and guests,

as well as respond to refugees' complex needs, which range from housing and employment, to mental health support and community integration. And yet, despite their central role in upholding the UK's response to the humanitarian crisis in UK, local authorities have received little focused attention.

Drawing on interview data with staff from 10 Ukraine response teams which, between them, were responsible for over 5,300 Ukrainians under the Homes for Ukraine scheme living across 12 areas in London, we find that the pressure to respond to yet another crisis has been immense. After years of austerity and in the context of the cost-of-living crisis, many councils are now struggling to support a sizeable Ukrainian population.<sup>6</sup> While for months the government was seen to be lacking in leadership, notably by offering no commitment to provide future funding, some local authorities have been taking matters into their own hands, including by stretching the limits of existing funding and hiring more staff to deal with increasing needs.<sup>7</sup>

To mitigate this crisis, the message from local authorities is clear: level up funding across the Ukraine schemes, provide more leadership, and rethink the approach to housing - as a refugee issue, but also as a long-neglected national issue. This, we argue, is not only sorely needed to tackle the risk of homelessness among Ukrainians, but also to better inform the UK's ability to handle humanitarian crises in the future.



**Figure 1 – Visa applications and grants on Ukrainian Visa Schemes, by week, for weeks ending 8 March 2022 to 27 September 2022. Published 24 November 2022. Source: Home Office**

### 3 METHOD

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Between October - November 2022, we conducted 10 semi-structured interviews with staff from Ukraine response teams covering 12 local areas across London. According to statistics published in December 2022, these areas had received over 5,300 Ukrainians with status under the Homes of Ukraine Scheme.<sup>8</sup> Considering that the data excludes Ukrainians with status under the other two Ukraine schemes, the overall numbers of Ukrainians our interviewees were supporting were likely considerably higher.

Participants ranged from senior members of staff with strategic oversight of the local authority's Ukraine response and funding, to caseworkers who were involved in everyday outreach and sponsor checks. On some occasions, both were present at the same time.

Building on our first report, the interviews started with a few open-ended questions about the needs of the Ukrainian population and the nature of the council's response, before prompting participants to reflect on their experience of conducting sponsor checks, their approach to managing arrivals, and their council's response to the risk of homelessness. Notably, we wanted to give participants a platform to reflect on how they could be better supported by central government. This is why interviews probed into councils' relationships with DLUHC and the Home Office, and encouraged respondents to reflect on how *they* would shape the UK's response to humanitarian crises, if they had the government's attention.

As with our initial report, our research has some methodological limitations. Firstly, our sample is small. While it captures more than a third of London councils, it cannot be generalised to the whole of the UK. We chose London as a centre for our interviews because, with over 14,900 arrivals under the Homes for Ukraine Scheme, the capital received a significant proportion of Ukrainians who found refuge in the UK after the beginning of the full-scale invasion. Similarly, even prior to the Russian invasion, over half of the Ukraine-born population in England and Wales was located in London.<sup>9</sup> A second limitation of this study is that qualitative research is by definition subjective. Interviews offer a valuable, in-depth account of respondents' experiences and world views, but they are not representative of all council staff involved in supporting Ukrainian refugees. Further research could investigate the responses of councils across the devolved regions of the UK, probe into urban-rural differences, as well as examine how councils' approaches vary with their leadership.

Despite these limitations, this research presents a vital opportunity to learn from the difficulties that authorities have been facing in administering the Ukraine schemes. To the best of our knowledge, beyond the media attention garnered by individual councils, this is the first substantive examination of what worked in the implementation of the schemes, what did not, and how the UK can better respond to future humanitarian crises. Findings are reported anonymously to protect the identity of interviewees, and to allow them to offer a candid account of work on the frontline.

## The Ukraine Visa Schemes

From March to May 2022, the UK introduced three visa-based schemes to allow Ukrainian citizens and certain family members of any nationality to arrive or remain in the UK.

**The Ukraine Family Scheme (UFS)** is open to individuals who wish to come to, or remain in the UK, by joining family members who are British citizens or have specific types of immigration permission (namely, indefinite leave to remain, refugee status, humanitarian protection – or, after an initial period of confusion, status under the EUSS).

**The Homes For Ukraine (HFU) scheme** allows people living in the UK to 'sponsor' Ukrainian nationals and family members of Ukrainian nationals, provided the sponsor can provide accommodation for at least 6 months and meet a number of suitability requirements, including passing background checks and accommodation inspections by local authorities. It has proved to be far and away the most popular scheme to date.

Initially, for each Ukrainian arrival under the HFU, the relevant local authority received a £10,500 tariff per arrival that they could use to deliver services under the scheme. Each host received a monthly £350 thank you payment for up to 12 months to assist in hosting their Ukrainian guest, while guests received a one-off interim payment of £200 to assist with their subsistence costs. In December 2022, there was an update to the funding arrangements under the HFU (see section 4.2 below).

**The Ukraine Extension Scheme (UES)** was designed to ensure that Ukrainians who had immigration permission in the UK (valid up to 16 May 2023), whether issued before or after the full-scale invasion, could continue their stay in the UK, even if they might not have been able to switch in-country to another immigration route under the usual immigration rules.

**Numbers.** According to the Home Office data updated on 15 December 2022, 255,200 applications have been received, and 208,900 visas were granted overall under the Ukraine schemes. Of these, 175,900 were made and 146,900 were issued under the HFU, representing a success rate of 84%. The UES follows behind this, with 18,300 applications received and 15,000 of applications approved, at a success rate of 82%. At the time of writing however, as many as 13% of UES applications were still awaiting an outcome from the Home Office. The UFS lags behind both, with 79,300 applications received and 62,000 visas issued, at a success rate of 78%.

## 4 COUNCILS' ROLE IN SUPPORTING UKRAINIANS AND OTHER VULNERABLE GROUPS

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Local authorities have a considerable task in managing the arrival of Ukrainians in the UK, and particularly in supporting those with status under the Homes for Ukraine scheme. DLUHC's guidance to local councils reflects this: '*the local council is responsible for initial checks, including at least one in person visit, payments to sponsors, ongoing support, school places, and information about the local area*'.<sup>10</sup>

In this chapter, we summarise some of councils' key obligations to Ukrainians. Though by no means exhaustive, we aim to offer insight into the depth of support expected, and the scale of administration involved.<sup>11</sup> It is important to note that councils' work with Ukrainians did not emerge in isolation. On the contrary, it is shaped by a recent pressure to support Afghan evacuees (many of whom continue to live in temporary accommodation more than a year since arriving in the UK), as well as by deeper structural pressures – including the pressure to prevent and relieve homelessness, despite a dwindling housing stock; and the pressure to maintain a standard of service after years of austerity.

Understanding the long-term tension between councils' increasing duties and their diminishing resources is, in our view, key: in understanding their difficulty to deliver for Ukrainians, but also to giving councils the support they require to assist them, and other vulnerable groups.

### 4.1 DUTIES UNDER THE HOMES FOR UKRAINE SCHEME

The Homes for Ukraine Scheme places local authorities on the frontline of integration. From welcoming arrivals to mediating relationships between guests and hosts, councils undertake several key functions.

**Managing arrivals.** Local authorities are engaged in the response immediately upon Ukrainians' arrivals on UK soil. Councils which have been designated by DLUHC as having '*primary ports of entry*' to the UK are required to set up welcome arrangements. According to the guidance, this should include the ability to provide immediate humanitarian assistance, but councils are also encouraged to consider offering basic facilities, links with local travel operators, triage points and potential overnight accommodation, as well as signposting and the provision of a welcome guide.<sup>12</sup>

**Sponsor checks.** Councils are also responsible for carrying out relevant checks of sponsors who have signed up for hosting arrangements. This includes accommodation checks, which require '*at least one in-person visit prior to the arrival of guests where possible*' (our emphasis).<sup>13</sup> The guidance states that local authorities have full discretion on the approach they take to these checks, as long as the



accommodation is 'suitable for the number and profile of people intending to live in it'.<sup>14</sup> Council checks also include the facilitation of DBS checks with the sponsors and other eligible individuals that will be living in the same household as the Ukrainian guests. Additionally, councils are expected to ensure that they undertake at least one in-person visit once the guest has arrived and started living in the accommodation, to raise and address any welfare concerns.<sup>15</sup>

In the context of unaccompanied minors, the process is slightly more prescriptive and in depth. Local authorities are meant to carry out a sponsor suitability assessment to ensure that sponsors know the child's parents, consent is in place, and that the accommodation in question will be safe and suitable for the child. If, in the case of Ukrainian adults, pre-arrival visits by the council are recommended "where possible", in the case of unaccompanied children it is only after sponsorship checks are successful that an applicant will be provided with a Sponsor Certification code that will then allow them to apply for a visa online.<sup>16</sup>

**Payments to sponsors and guests.** Another duty which falls within the remit of local councils is the administration of payments to sponsors and guests. To begin with, councils were themselves provided with a £10,500 tariff from central government for each Ukrainian who arrived within their catchment area under the HFU. From this, they were tasked with administering £200 interim payments to guests – the £350 monthly thank you payments to sponsors were and are funded separately. On 14 December 2022, DLUHC announced long-awaited updates to the funding of the HFU scheme.<sup>17</sup> Thank you payments were increased to £500 for sponsors hosting Ukrainians who were already in the UK for 12 months, while the payments generally were extended to 2 years instead of 12 months. For arrivals entering the UK after 1 January 2023, council tariffs have been reduced to £5,900 per person. £150 million in additional funding was provided to local authorities across the UK to help support Ukrainian guests to move into their own homes and reduce the risk of homelessness. Councils were also directed to a new £500 million fund to acquire housing stock for those fleeing conflict more generally.

Beyond these general provisions however, councils are encouraged to agree local plans for how these payments are actually delivered, and have discretion to further support both guests and sponsors from the tariff allocation.<sup>18</sup>

**Data collection** is another important aspect of the HFU delivery – indeed, it is a condition of the payment local authorities receive from DLUHC. DLUHC and the Home Office inform councils of the sponsors and would-be Ukrainian guests within their catchment area via a case management system called 'Foundry'. The information sharing process via Foundry throughout the life cycle of a HFU arrangement is as follows:

1. Sponsor and guest data is submitted to the Home Office via visa applications;
2. This data is shared with DLUHC and local authorities via Foundry, including the sponsor's contact details, address, and the guest's visa status (this specific

functionality was only developed later, as the lack of visa information was problematic at the start of the scheme). This is the point at which councils can begin to conduct sponsor checks.

3. The Home Office processes the HFU visa. Ideally, this should happen *after* the council has checked the sponsor's address – but as our findings section reveals, this was often not the case.

Data is updated every day and councils are required to log into Foundry at least once a week. This may be to check prompts from DLUHC requiring them to initiate a check, to note when a DBS check had been initiated, to record that the guest has arrived and that safeguarding checks have been undertaken post arrival. Any suitability or safeguarding issues are meant to be reported immediately.<sup>19</sup> If local authorities have issues or queries in relation to hosting arrangements or the Foundry system, these are raised as 'tickets' on a platform known as the 'Jira' helpdesk, which DLUHC is meant to review and address.

**Rematching.** When hosting arrangements between sponsors and guests break down, the DLUHC guidance makes it clear that councils play an additional role in 'rematching' them with other eligible sponsors. Local authorities are able to assess new sponsors from the 'Expressions of Interest' recorded on Foundry, or ratify sponsors identified directly by Ukrainians. Rematching beyond local authority boundaries is also possible, but only with the consent of the receiving authority, who then takes over the relevant checks and the administration of payments, as well as the remainder of the tariff.<sup>20</sup> This functionality on Foundry was developed later on in the scheme, after much feedback from local authorities.

## 4.2 STATUTORY DUTIES

Beyond their immediate role in supporting Ukrainians and their eligible family members, councils also have key statutory duties, including the prevention and relief of homelessness, and the protection of children and other vulnerable groups.

**Prevent and relieve homelessness.** According to the Housing Act 1996, councils owe a 'prevention' duty to individuals threatened with homelessness – that is, individuals who are likely to become homeless within 56 days. In essence, the prevention duty involves assisting individuals to stay in their current accommodation, supporting them by drawing up a personalised housing plan (PHP), and securing other accommodation when existing housing arrangements cannot continue.<sup>21</sup> In addition to their duty to prevent homelessness, councils also owe a 'relief' duty to individuals who eventually become homeless. This requires them to take 'reasonable steps' to help the applicant secure accommodation for at least six months, which may involve supporting them to find accommodation in the private rental sector, or through other means, as identified in the personalised housing plan. The relief duty ends 56 days after it was accepted by the local authority. At this stage, there should be a consideration as to whether the main housing duty applies, which would involve the local authority actually providing temporary accommodation through its own stock, a private

landlord, or social housing provider. The duty will continue until the person is no longer eligible for assistance, or until they accept or refuse offers of accommodation.<sup>22</sup> If a local authority is unable to fulfil its statutory duties, this will likely amount to unlawful conduct by a public authority. Such conduct opens the council up to individual legal challenges, or inquiries by the Local Government & Social Care Ombudsman.

**Protect children.** A myriad of different laws also shape councils' duties towards children and unaccompanied minors. The main piece of legislation in this area is the Children Act 1989, the source of several statutory duties. Under section 22(3), councils have a general duty to safeguard and promote the welfare of any child they are looking after – this includes any child who is in the care of a local authority or who is provided with accommodation by the authority in the exercise of social services functions. Section 27 allows them to request the cooperation of other local authorities, if it would assist in the exercise of their functions. Section 17 requires councils to 'safeguard and promote the welfare of children within their area who are in need', and it is likely unaccompanied Ukrainian minors will fall within this cohort, while section 20 requires local authorities to provide accommodation for children within their area, if the need results from 'there being no person who has parental responsibility' for them.<sup>23</sup> All of this legislation is then supplemented by practical guidance, such as the Working Together to Safeguard Children framework, or by guidance which specifies how councils should deal with cases of exploitation, such as those derived from trafficking, modern slavery or domestic abuse.<sup>24</sup>

### 4.3 LOCAL AUTHORITY BUDGET CUTS

Despite the breadth of their responsibilities, councils have been facing budget cuts for at least the last 12 years. The coalition government of 2010 instituted a decade-long programme of austerity. Designed to reduce the UK's national deficit by limiting public and private sector borrowing,<sup>25</sup> austerity policies have effectively decimated council budgets and instituted a pressure to cut back spending, including by reducing crucial services.

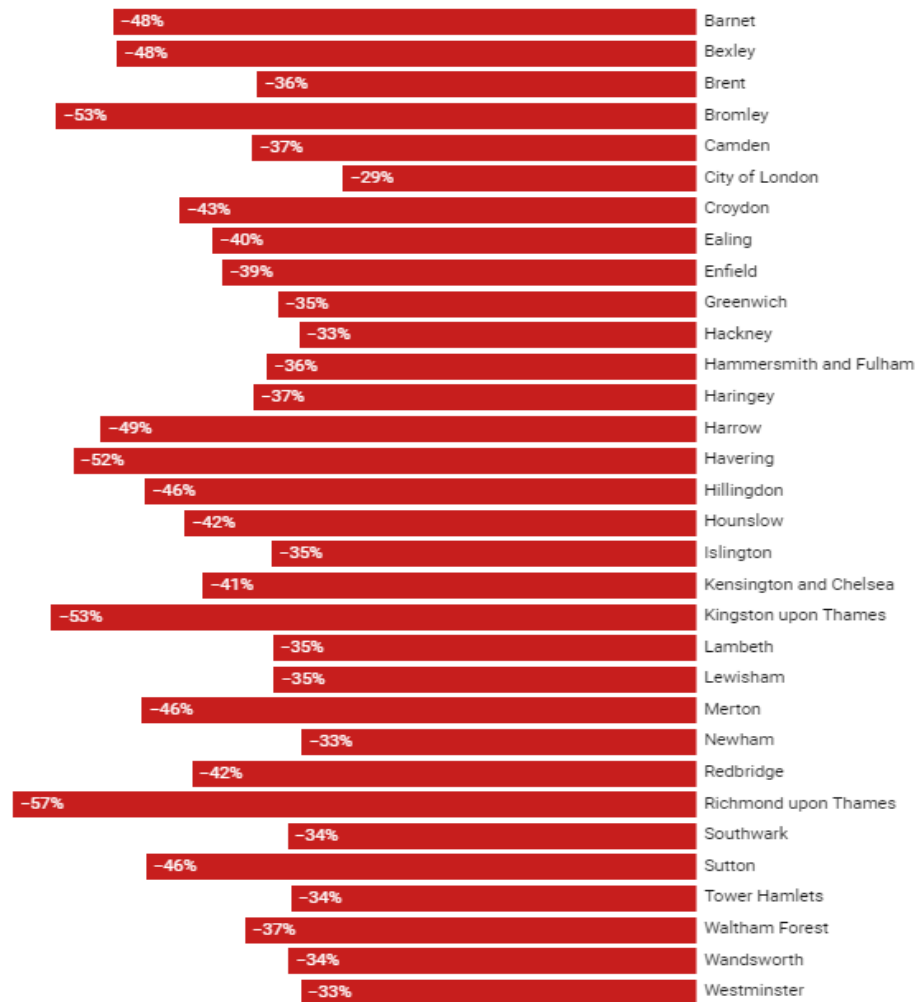
During the last decade, spending on council services fell by 17% in England, and grant funding was reduced by £16 billion. This radically reshaped the availability of public services. To give just a few examples, under the policy of austerity across England, Scotland and Wales, council subsidised bus routes have decreased by 32%. A whole 21% of public toilets have closed, and 22% of libraries are now run by volunteers, in private hands, or have simply been closed.<sup>26</sup>

The picture for London has been particularly bleak. According to London Councils, between 2010 to 2020, London local government has seen a funding reduction of 63%, and London boroughs have had their spending power per person reduced by 37% in real terms. By contrast, spending power per person in local authorities across the rest of England fell by 29% - a significant reduction, but considerably less abrupt than in the capital. Delivering services within these financial constraints, most local authorities have had to scale back on staff too. Across the London boroughs, there has been a 25% reduction in overall workforce since 2010. According to one metric, between 2010 and 2017, there were nearly 50,000 fewer people working for London

boroughs.<sup>27</sup> Figure two (below) captures the cuts that local authorities in London have faced since 2015/16 via reductions in funding through the Local Government Finance Settlement, the annual determination of funding to local government.

### Decrease in Local Government Finance Settlement funding to local authorities in London

Between 2015/16 to 2022/23, in real terms



**Figure 2 – percentage change in Local Government Finance Settlement funding for local authorities in London between 2015/16 and 2022/23, in real terms. Published 16 February 2022. Source: Department for Housing, Levelling Up and Communities**

More than a decade since the coalition government announced its austerity regime, the financial outlook for local councils remains poor. According to research conducted by Unison, councils across England, Scotland and Wales will face a financial shortfall of £3.19 billion in 2023/2024, likely to rise to £5.28 billion in 2024/2025. Almost all (86%) local councils across the UK are predicted to have a budget gap, and it is likely that many will be forced to rely on 'dwindling reserves, and cut services and jobs'.<sup>28</sup> Most recently, in his 2022 Autumn Statement chancellor Jeremy Hunt

announced a serious of public spending cuts that will stack up to nearly £30 billion in departmental savings. All of this combined means that, in the coming years, public services will be stretched like never before.<sup>29</sup>

### **Managing Afghan arrivals**

Twenty years after their ouster by US troops, in August 2021 the Taliban, a predominantly Pashtun, Islamic fundamentalist group, returned to power in Afghanistan. In response, the UK government instituted a programme of resettlement, which allowed a number of Afghans worried for their safety to relocate in the UK. Similar to the approach adopted after Russia's full-scale invasion of Ukraine, the UK's response to the Taliban's ascent in Afghanistan was not to rely on existing immigration rules, but to institute new schemes.

The '**Afghan Relocations and Assistance Policy**' (ARAP) adopted on 1 April 2021, offered '*relocation by default*' to Afghans who were directly employed by the UK government, or contracted to provide linguistic services to UK Armed Forces after 1 October 2001. The ARAP restricted eligibility to Afghans who, in those roles, had been exposed to public recognition, and who were consequently at risk of retribution under the Taliban regime. Those who believe they are eligible under ARAP can still apply online.

The '**Afghan Citizens Resettlement Scheme**' (ACRS) launched separately on 6 January 2022. Overall, the ACRS was open to three pathways, including: Afghans called forward in the UK's evacuation programme (known as 'Operation Pitting'); those referred by the United Nations High Commissioner for Refugees (UNHCR); and to other at-risk individuals, such as women and members of minority groups, or those who supported the UK and international community in Afghanistan.

If deemed eligible by the UK Ministry of Defence, and suitable by the Home Office, applicants and family members under the ARAP or ACRS schemes will effectively be granted indefinite leave to enter or remain in the UK, meaning that they have the right to work, and the ability to access healthcare, public funds and education.

The Home Office have effectively led the accommodation response for Afghan nationals. Many have been placed into bridging accommodation, with local authorities finding alternative settled accommodation where possible. However, if the intention was to transition them into more sustainable long-term housing, many Afghans continue to live in costly temporary hotels, more than 18 months since many of them were evacuated to the UK. Indeed, as of 24 November 2022, a total of 9,242 Afghans, around half of them children, were still living in 63 hotels across the UK, according to Home Office statistics. In February 2022, the Home Office noted that the daily cost of housing Afghans in bridging hotels had reached an eye-watering £1.2 million.

## 5 THE VIEW FROM LOCAL AUTHORITIES: URGENT ISSUES

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Interviews with local authorities revealed that, despite a striking diversity of experience and resources, London councils shared an unfaltering commitment to supporting Ukrainian refugees. From micro teams of no more than a few members of staff, to teams comprising a dozen professionals, councils organised to check sponsors, welcome arrivals, and respond to the long-term challenges of refugee integration with local initiatives, even when guidance from central government was paralyzingly short-term.

In this chapter, we review their responses, and the challenges encountered. We find that underneath the public narrative of success, with rapid visa processing and high acceptance rates, the implementation of the Ukraine schemes suffered from serious limitations. First, the absence of a data validation mechanism on DLUHC's sponsor registration form had left the system open to abuse, and local authorities pressured to spend precious time conducting address checks for properties that never existed in the first place. Second, a mismatch of timelines and poor communication on the Foundry system meant that, on many occasions, the Home Office approved visas *before* councils got to conduct the necessary sponsor checks, leaving Ukrainian families vulnerable to exploitation. Third, the fact that for nearly ten months (until 14 December 2022) central government offered no long-term planning beyond an initial one year of funding, had left council staff feeling under pressure, and worried for their own employment continuity. In this chapter we will look at each one of those urgent issues in depth, before turning to the long-term challenges of refugee housing and integration.

### 5.1 A DIVERSITY OF RESPONSES

Less than a year after the first Afghans arrived in London fleeing the Taliban's return to power, the humanitarian crisis in Ukraine opened a new frontline for local authorities. Councils once again found themselves facing the challenge of responding promptly, to families who needed urgent support with housing, schooling, and mental health assistance, while contemplating the long-term challenge of integration in a city notorious for its cost of living and dwindling public resources.

The interviews we conducted indicated that, even with this familiar dynamic, there were about as many types of response as there were local authorities. Some councils shared Ukraine response teams, while others built their own in-house capacity. Among the latter, one council operated with a team of just a few members of staff, who oversaw a small caseload of Ukrainian families. Over the course of several months, they had come to know every Ukrainian guest, playing a close role not only in their arrival, but also in their ability to find work. Other teams, by contrast, comprised a dozen members of staff, who looked after caseloads of hundreds of Ukrainian families. This caseload, they noted, included the guests they knew and recognised from Foundry systems, but also many Ukrainians who arrived in the borough unexpectedly, from other parts of the UK, needing just as much support.

'We've had a lot of people come from other parts of the UK, and we can barely source accommodation from people who have come to [our council] via HFU.'

Despite this diversity of resources, what all local authorities shared was a determination to support Ukrainians. This included the sponsor checks required by DLUHC, but also far exceeded it. Interviewees described their experience of organising drop-in sessions for new arrivals, where the council could impart key information on entitlements under the visa schemes, local infrastructure, and everyday life in the UK. In many cases this was in conjunction with Voluntary and Community Sector (VCS) organisations, which played a key role in welcoming Ukrainian families with small acts of hospitality such as community walks, picnics, and introductions to the local community. Several interviewees also took pride in their councils' abilities to organise job fairs for Ukrainians, taking the lead in supporting families to build independent livelihoods in the UK.

'Once they arrived in larger numbers, it was helpful that we had that existing work for hotels for asylum seekers, because we built a bit of partnership with resident response and VCS in that area. We established a welcome hub, volunteers and residents - they had things like Sunday lunches together, bread making, walks around the local area. That was the next phase - getting a model in place for people to come here and get guidance. One of the elements was just a welcoming space, rather than relying on phones and online services. Building on that, we introduced a hub at the library, run largely by VCS. We opened a hub in east of the borough led by VCS organisations led by refugees and migrants.'

Perhaps the biggest point of pride in our interviewees' responses was that, despite the strictures of central government funding, their support was extended to all Ukrainians, regardless of DLUHC's narrow focus on HFU arrivals.

## **5.2 SUPPORTING UKRAINIANS WITHOUT FUNDING**

A central feature of the Ukraine Schemes is that they come with very different levels of funding. As detailed previously, sponsors under the HFU have the option of claiming a monthly payment of £350 (for new sponsors) or £500 (for sponsors already hosting Ukrainians who have been in the UK for 12 months) for 2 years to assist with sustenance costs (this does not increase depending on the size of the family sponsored). Guests themselves receive a one-off £200 payment under the scheme. Local authorities have been receiving a £10,500 tariff for each Ukrainian sponsored in their area under the HFU, but for arrivals from 1 January 2023, this will be reduced to £5,900.

This financial support is not replicated across the UFS and UES, even though we know that Ukrainians face the same practical hurdles when they arrive and try to settle in the UK regardless of immigration status.<sup>30</sup> This sentiment was shared by interviewees, who noted that many of those under the UFS were turning to them for assistance.

'We also get lots of people on UFS, who need financial support, or broken-down relationships, so many other issues. We placed them in temporary accommodation or provided jobs and other financial support. We never say no, but it's down to us to do it. And we also can't get them the £200 upfront payment that HFU get, we can't pay the family the £350/month. The only thing we can do is other general support.'

While everyone we interviewed recognised the fact that Ukrainians experienced similar needs for support, whichever visa scheme they were on, some respondents were frank about their limited ability to support Ukrainians on the UFS. Without dedicated funding, and without oversight of accommodation arrangements, their plight was an unknown quantity and a much harder issue to resolve:

'The UFS took us by surprise, and we had to figure it out ourselves. In my case, I support everyone, but I don't get any overview, I just use my initiative. So for housing, I come across a lot of families, but am not necessarily able to offer support.'

'[w]hat does happen, is I get calls from people on the other schemes. I had a lot of people calling me on the UFS to ask around eligibility for the £350 payment to their family members, whether they could flip onto the HFU [...]. Family scheme hosts are doing exactly the same as HFU hosts, but are not getting the same support.'

Despite local authorities' efforts to be as inclusive in the support offered to Ukrainians as possible, the differences in funding had significant limitations. For example, the very fact that the HFU scheme required sponsors to pass certain property requirements, and the UFS did not, led to a selection bias. Many Ukrainians who came on the UFS did so because their families' dwellings would never have passed the spare room requirements to qualify for sponsorship under the HFU in the first place. Consequently, arrivals with status under the Family Scheme (often entire families) ended up joining one or two relatives in small accommodation. This was leading to overcrowding and increased homelessness rates amongst UFS arrivals:

'...there are inequalities that sit within the schemes. We have HFU which we can control, where we look into sponsors, their homes, we do DBS checks and make sure they're not overcrowded.

Sponsors get money, so do guests. With UFS they're more problematic and have the highest homeless rates. And they are large families, not just one lady and her kids. It's families of six, sponsored by family members, who sometimes live as 12 in a two-bed flat, or 7 in 1 bed flat. So we've had to address that and it's huge pressure, because we don't get any funding... we decided



nonetheless that we would offer the same support for these people, and do visits on a weekly and monthly basis...'

Interviewees discussed examples of where council staff had come across Ukrainian families with UFS status, who were struggling with the most overcrowding, but received the least amount of support.

'There was a pensioner who came with his 11-year-old granddaughter, to join his daughter, who had a social worker already. So you had a woman, two children with behavioural needs, a grandfather and an 11-year-old girl living in one bedroom. It took a really long time for the council to realise that this [exclusion of UFS from funding] isn't fair. There were so many arguments in the house, it was a bad environment for the child; and the referral process was very problematic.'

The glaring inconsistency in funding arrangements within the Ukraine schemes was most jarring for local authority staff who had been involved in the recent resettlement of Afghan refugees. The provision of funding for Afghan arrivals had been drastically different. As part of its resettlement plans for Afghans, the Home Office put forward different layers of financial support for councils, including: a £20,520 payment for each refugee, tapered over a three year period; up to £4,500 per child for education, £850 to cover English language support for adults and £2,600 for healthcare costs; £20m in additional funding of flexible funding to support local authorities with higher base costs; and an increase in the funding provided to the Afghan Housing Costs Fund. This separate fund allowed local authorities to top up rental payments for Afghan families in cases where benefits would not cover the cost of renting, particularly for larger properties. The fund was also extended for two years to assist local authorities in the provision of housing support.<sup>31</sup>

Before DLUHC's funding announcement on 14 December 2022, there was no multi-year commitment or a nod towards resettlement funding. This meant that authorities did not have the ability to plan out financial commitments to families that they might have been supporting, and by definition have had to stretch out payments which were received up front.

The contrast between the financing, and logic, underlying the Afghan and the Ukraine schemes, respectively, had not remained unnoticed. On the one hand, some interviewees reflected on the everyday operational challenges of supporting Ukrainians without any plan for settlement after the first 12 months:

'...compared to the Afghan schemes, where we got separate pots based on temporary and permanent settlement... now, we can use the money [the HFU tariff] to help with temporary accommodation, but we can't do both. Not knowing whether this funding will continue beyond 12 months, makes it very difficult.'

On the other hand, the lack of more long-term funding also cast doubt over council teams' own continuity. One respondent explained how, in the absence of security of funding, most of the staff on his team were working on rolling contracts. Worried about their own future amidst a financial crisis, some were already beginning to look for other work, which risked the council losing precious expertise, and the opportunity to learn from past experience.

'People are getting fixed term contracts and will have to start looking for other jobs without that security. We saw the same thing during Covid. We lost good staff, who had great knowledge and expertise. Most people are on fixed term or rolling contracts. I would definitely change that. You have amazing people on these projects. The last thing you want to do is lose them. You don't want to have to recruit again, lose that knowledge. And most people don't do it for financial gain, they do it because they care, because it adds moral value.'

Overall, the message coming from local authorities was that decisions around funding had been made by government, with little consultation of councils or Ukrainians and their intentions around potentially settling in the UK. Without this information, the funding allocated to the schemes reflected the overall pace of their implementation: piecemeal, reactive, with little thought given to the long-term.

### 5.3 MANAGING SPONSOR CHECKS AND THE RISK OF EXPLOITATION

Another worrying and consistent finding relating to the HFU was that, despite the original intention to check sponsors first and issue visas only after there were no concerns, many visas had in fact been issued long before council teams had a chance to review sponsors.

**Data validation.** One of the main reasons behind local authorities' difficulties with sponsor checks was the absence of data validation in certain circumstances. According to our interviewees, authorities were working from two main lists - an Expression of Interest list, containing a list of all those expressing an interest to sponsor Ukrainians, and a separate visa list, containing the details of sponsors who had actually gone through or were going through the visa application process.

The web form through which DLUHC encouraged members of the public to express interest in hosting families under the HFU was open to abuse. Without robust controls, any user with malicious intent could submit a fake expression of interest, flooding DLUHC, and by extension Foundry, the case management system used by local authorities, with addresses and "sponsors" that never existed in the first place.

'At some point, there were so many applications, I thought it was Russian bots. The so-called sponsor entries were noisy, email addresses were not real and the addresses used were often businesses... It got to a point where we were asked to go out and visit these addresses which included a smoke shop, or a kebab

shop [...] In the end, over half of the entries turned out to be completely false.'

In addition to the fake or dummy information, which at least some councils had eventually learnt to weed out by cross-referencing sponsor addresses with their own list of council tax records, there were also cases where real sponsors who volunteered to host one family, had their information included on multiple other visa applications without their knowledge.

'We had a situation where one sponsor told us that they didn't know how to stop other people from using their information. It was a husband and wife who agreed to help one guest initially, but it is likely that the guest shared their contact details with others, to the point where several other Ukrainians were using them as "sponsors" too. So the system was broken on both sides. I understand that at the time getting people out [of Ukraine] was the main priority, but you have to be more careful when it comes to, say, unaccompanied minors or third country nationals.'

The absence of data validation mechanisms meant that, in practice, precious time was spent by councils investigating bogus addresses. More worryingly, it also meant that visas were issued with a false sense of security, before local authorities actually had a chance to conduct the requisite sponsor checks. It also meant that the needs of Ukrainian arrivals were under-represented, and the availability of sponsors to host them was over-represented. Simply put, the percentage of viable hosts was much lower than the initial pool of expressions of interest, with one council estimating that:

'fewer than 10 percent of sponsors who express interest actually respond, once we contact them about matching; and even fewer commit to doing the DBS checks and going through the process. Months have gone by since they signed up, many didn't understand the requirements involved, and there's a lot of bad data, with sponsors like "Mickey Mouse" and "Vladimir Putin" registered. '

**Issues with information on Foundry.** The issues with sponsor data were underscored by a bigger issue of communication between local authorities and central government via the Foundry case management system and the Jira helpdesk. Our interviewees recounted instances where the Home Office processed visas before they had the time to upload any information on checks conducted, but also where checks they had actively marked as "failed" turned to sponsorship being "confirmed" and, in some cases, guest status marked as "arrived".<sup>32</sup>

'Foundry is not working. The sponsors come up, but we do not even have the time to view the house or do a DBS. We have raised this,

and all local authorities have raised it too. Because safeguarding is our problem.'

'Visas have been issued without us uploading any checks throughout the process.... I think we have had a few housing checks that have failed and visas were still issued.'

'JIRA allows us to raise issues, which seems great, and when the requests show up as resolved, you would think it is fine. But then we noticed that even "resolved" tickets were still on our caseload. [...] there were times when the checks we failed turned to "confirmed", and in some cases even "arrived". So we were very worried that guests arrived, and we didn't know where, or whether they were safe.'

'I think the government have assumed that we can turn everything around in a couple of days, but sometimes we have people appear in the country before they appear in Foundry. At the start, we had people arriving at properties just as our housing teams were going out the door, saying that the housing wasn't suitable...'

**A real risk of exploitation.** The data and communication issues made exploitation a very real prospect for Ukrainians who arrived under the HFU scheme. Several interviewees noted that, while councils had been charged with the serious responsibility of safeguarding Ukrainian families, they simply were not given the resources to carry out this duty consistently, and systematically. For most, this was a theoretical risk they were aware of, and frustrated by.

'...local authorities are burdened with so much risk. Other than the police and the NHS, we carry the most risk. We would like to exercise that responsibility as well. [...] Thank goodness nothing has happened in our area yet. But when and if it does, it will have felt preventable. To have DLUHC say "thank you" for your feedback when the issues we raise are really foundational – that is not enough.'

In other cases, respondents encountered situations where Ukrainians almost became victims of the system. In one instance, the council intercepted a possible case of exploitation, by a sponsor whose criminal record made them highly unsuitable to host:

'We have had to move a woman because of a sponsor's DBS record. And that is extremely difficult. In other cases, visas are issued for children before they are issued for parents, and the system looks like the children have left - then we call Ukraine to speak to the parents because we have interpreters, and find out that isn't the case...'

In other interviews, local authority officers shared disturbing examples of Ukrainian families who, eager to be matched with a sponsor as soon as possible, had fallen victim to a predatory market of for-profit advisers, who charged exorbitant sums to facilitate access to otherwise fee-free visa schemes.

'... a family paid £55,000 to someone in the UK who promised them a visa and a house. The same thing happened to their cousin. Another person paid £2,000 for a visa, and was asked for £1,000 on arrival. We had to step in and stop it.'

## 5.4 FRONTLINE STAFF UNDER PRESSURE

The weight of safeguarding vulnerable families, while operating within a system which seemed to undermine that very duty, had taken a toll on the emotional and mental health of some frontline workers. One interviewee described how:

'It is hard on our team, they can now get counselling sessions because they were hearing stories, seeing things and crying, but now they have hardened up to what happens.'

In another case (before DLUHC's latest funding announcement), the project manager of a large team was anxious at the lack of long-term security inherent in the scheme, and the way it affected Ukrainians supported by the local authority, but also council staff themselves.

'The anxiety is that DLUHC haven't given us a sense of what will happen after 12 months. And yes, they gave sponsors some payments, but the cost of living devalues that. We are anxious because we don't know how to plan forward. A lot of it is one sided. Local authorities just have to accept their policy, adopt their framework.'

The professionals we interviewed were also angry and frustrated at the fact that all the issues they were seeing seemed, as one of them put it, "preventable". Many were puzzled as to why the extra precautions taken for unaccompanied Ukrainian minors under the HFU route could not be extended to all HFU arrivals more generally, particularly as the number of HFU arrivals to the UK has stabilised since its peak in May 2022:

'We know that UKVI do a Police Network Check, but if that is just based on names, that's likely to be flawed. So there is a risk of exploitation. If someone [i.e. a sponsor] wants to exploit it, they will advertise their room on Facebook, the guest will get a visa and move in before we have a chance to do a check. Take unaccompanied minors, for example. It was promised that they could not arrive yet until the checks were completed, so why not

do the same for adults? [...] There is a disconnect between the speed of checks, and the speed of visa issuing, which can allow exploitation to happen.'

Similarly, interviewees were dismayed by the fact that, despite their reporting of individual cases and system-level issues to DLUHC and the Home Office, these conversations had yet to turn into concrete actions:

'The Home Office have recognised this and set up a fraud department to deal with this, so they have a mechanism now in place to sort that out. DLUHC are also trying to fix the visa and safeguarding mismatch, in terms of timelines. The problem is the conversation between the Home Office and DLUHC. They are meeting three times a week.'

Overall, there was a sense that, while some of the technical issues raised on the Jira helpdesk were considered promptly, and with the best intentions, bigger points about DLUHC and Home Office policy and the overall working of the Ukraine visa schemes fell on deaf ears. Despite the existence of regular consultative forums, where DLUHC officials welcomed feedback and thanked council staff for their candour, the exercise felt performative, rather than substantive. This was visible in the ways in which DLUHC responded to questions about the inconsistency of funding, safeguarding, and the pace at which visas were issued. Notably, it was visible in the department's silence when it came to the long-term challenge of supporting Ukrainian families with housing and integration.

## 6. THE LONG-TERM CHALLENGE

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As the six-month sponsorship arrangements were beginning to come to an end, most local authorities were worried about the risk of another crisis of homelessness. Many placements under the HFU, our interviewees noted, are reaching a natural conclusion. Even people who had taken up the mantle of sponsorship very seriously, and had enthusiastically supported Ukrainian families with GP registration, school enrolment, and integration into life in the UK, were beginning to look at ways to exit their hosting duties. Changes in family circumstances, financial pressures, or simply the fact that sponsors had expected their arrangements to be temporary, led to the uncomfortable but unavoidable reality of a housing cliff edge.

In this chapter, we focus on the long-term challenge of providing Ukrainian families with sustainable housing. Overall, we find that housing shortages, an unaffordable private rental sector, and benefit levels which fell far behind even the cheapest London rents, presented local authorities with a formidable problem. Several councils took matters into their own hands, instituting creative solutions which included upping thank-you payments for sponsors, engaging in rent brokerage with landlords on the private sector, or making out of area placements in social housing. Beyond these temporary fixes however, our respondents acknowledged that solving the housing problem was a question of leadership – from regional bodies which can encourage the sharing of best practices, but most importantly from central government, who they saw as in desperate need of a strategy.

### 6.1 HOUSING REFUGEES IN ONE OF THE MOST EXPENSIVE CITIES IN THE WORLD

The risk of homelessness identified by our interviewees at local authority level reflect a bigger national picture. In the summer of 2022, an ONS survey looking at the intentions of hosts under the HFU revealed that 1 in 4 (25%) hosts were only willing to provide accommodation for a period of 6 months or less, and a further 15% were not sure how long they wanted existing hosting arrangements to last.<sup>33</sup> Thankfully, in the latest iteration of this survey, these figures have come down, but the most common difficulty for hosts now is the uncertainty around what will happen to their Ukrainian guests after sponsorship comes to an end (66%).<sup>34</sup> Our earlier survey of Ukrainians found that as many as 1 in 10 respondents had been threatened with eviction at some point during their stay in the UK, and that this position was even more precarious for Ukrainians on the UFS, who could neither access the funding, nor benefit from the regular safeguarding visits normally required by local authorities for guests under the HFU.<sup>35</sup>

**Declining housing stock.** One of the main reasons that local authorities were struggling to place Ukrainians into longer term accommodation was, according to our interviewees, the absence of sustainable housing options.

'We don't have any affordable properties, they [Ukrainians] need help to access affordable private accommodation.'

'We've had a lot of people come from other parts of the UK, and we can barely source accommodation from people who have come to [the local authority in question] via the Homes for Ukraine scheme.'

Between 1991 to 2020, there was an average annual net loss of 24,000 social homes. Simply put, fewer social homes were being built than the number being lost through sales or demolitions every year.<sup>36</sup>

The erosion of social housing is part of a long-term trend of declining housing stock. If in the 1960s as many as 3 million homes were built, housebuilding in the UK has more than halved since, with only 1.3 million homes built in the 2010s. Similarly, the Right to Buy scheme, which allows council tenants to purchase their council homes at discounted rates, has put another dent in the social housing stock. Initially introduced by the Conservatives under the Housing Act 1980, to limit the obligations of local authorities whilst also increasing the numbers of homeowners, the scheme has since contributed to a steady, and permanent, decline in affordable housing. If originally the intention was to replace every home sold under Right to Buy, this one-to-one replacement has not materialised in practice.<sup>37</sup>

In December 2022, DLUHC announced a £500 million Local Authority Housing Fund to support councils in England to buy stock, build new homes, convert existing non-residential properties or refurbish dilapidated housing into accommodation for families.<sup>38</sup> According to the department's estimate, this could contribute to the creation of 4,000 homes by 2024. Though a welcome measure, it is important to remember that the housing stock deficit is crushingly larger. According to research commissioned by the National Housing Federation and Crisis, to truly fix the housing stock deficit, the UK would need to build 145,000 new affordable homes every year, until 2031.<sup>39</sup> Even among the refugee population alone, as many as 9,000 Afghans are in need of long-term housing, after staying in temporary hotels for over a year, and thousands more Ukrainians are likely to follow suit, if relationships between Ukrainian arrivals and host continue to break down at pace.

**Impossible rents.** While the reasons behind the erosion of Britain's housing stock are complex, the effects of this decline on house prices and rents are hard to miss. A home cost four times the average salary in the year 2000, and eight times the average salary in 2021.<sup>40</sup> This price-wage disparity is even more acute in London, where the average house now costs nearly 10 times the average salary.<sup>41</sup> In terms of rent, London holds the record for one of the least affordable capitals in the world. In our first Ukraine report published at the end of September 2022, we referenced an ONS study, which recorded a 2.1% annual increase in London rent, and the SpareRoom Quarterly Rental Index, which recorded a 15% increase. In the three short months since the publication of our report, the figures were updated to show a 3.5% increase in rent, according to the ONS,<sup>42</sup> and an 18% increase according to SpareRoom (£857pcm).<sup>43</sup>

'We're all fighting over the same pool of private rental sector accommodation that has been significantly reduced since the pandemic, and landlords can play us up...'



According to our interviewees, the rapidly rising cost of rents in London meant that the financial commitments required to meet them were unrealistic, for individuals and councils alike:

'When we have a housing case we refer that to the housing team, but I do know that rents are very high, stock is very low...'

'The market is stretched across London and is really difficult. A lot of people are claiming benefits, do not have savings set aside to pay 6 months' rent upfront and do not have guarantors to rely on. It feels like an awful cocktail of things - a bad market but also difficult individual circumstances.'

Another measure announced in December 2022 by DLUHC included a £150 million fund for local authorities across the UK to support Ukrainians to move into their own homes and reduce the risk of homelessness. Once again, while broadly welcome, it is important to put the figures into context. Given the overall number of Ukrainian arrivals under the HFU and UFS alone, the fund would amount to an average of around £1,000 per refugee, if distributed equally. For a family of two, renting a one bedroom in the West Midlands, this could cover almost four months' rent – arguably a good first start. For a similar family looking for a one bed flat in London, the fund would cover less than two months' rent. The key, therefore, is in the implementation and distribution of the fund.<sup>44</sup>

**Insufficient benefits support.** Another factor which contributed to the risk of homelessness among Ukrainians was the discrepancy between rents, and the level of benefits which they could obtain. Local Housing Allowance rates determine the maximum financial support a benefit claimant can receive to cover the costs of renting in the private sector. They are set depending on the area in which individuals are located, and adjusted to the type of property that is deemed to be appropriate based on personal circumstances such as household size.

Since 2011, LHA rates have been set to cover the cheapest 30% of suitable properties in any given area – down from the cheapest 50% before. However, consecutive freezes from 2016 to 2020 have meant that, over the past few years, LHA rates have fallen far behind the actual value of rents in the private sector. Research by the homelessness charity Shelter found that in 2020, families in London experienced the greatest shortfall between Local Housing Allowance and the rent they were charged, of any part of the UK. For a small family renting a two-bedroom flat, this ranged from a shortfall of £383 in the borough of Hackney, to as much as £1,252 in Kensington and Chelsea.<sup>45</sup>

A similar point can be observed in relation to the benefits cap, which limits the total amount of benefits that a single household can get. For example, a single adult with a child is entitled to a maximum of £20,000 outside of Greater London, and £23,000 if they live within Greater London.<sup>46</sup> The benefit cap leaves households with a similar financial shortfall when it comes to rental payments. Overall, as of February 2022, 54% of households claiming housing benefit have a shortfall in comparison to their rent.<sup>47</sup>

'The question of affordability in London is one we have with our own residents: housing benefit doesn't cover the cost of suitable accommodation.'

'... the problem is getting people into the private rental sector, because they cannot afford it with the rents that we have and the Local Housing Allowance cap that is in place too. The benefits cap hasn't increased either.'

## 6.2. LOCAL FIXES FOR A SYSTEMIC PROBLEM

In the absence of direction from central government on how to incentivise current and new hosts to continue HFU arrangements, and how to tackle barriers to the private rental sector, local authorities were finding their own solutions proactively.

**Incentivisation.** Several councils were beginning to rethink the amount of funding that they provide to hosts under the HFU, in our sample and across the UK. For example, North Northamptonshire County Council and Essex County Council announced increases to the thank you payments allocated to HFU hosts, from £350 to £550 a month. The latter also announced one off payments of £500 for hosts that would continue to have Ukrainian guests stay with them for all or at least part of December 2022.<sup>48</sup> The rationale for these increases has been simple – councils are grateful for the support of their communities and have recognised that the cost of living has made the job of hosting harder.

This practice of incentivisation was also reflected by some of our interviewees, who instituted top up payments to ensure hosting arrangements continued, at least in the short term:

'To be honest, at the beginning local authorities said that in six months' time they would have a homelessness problem. We have around 80 sponsors, and around 60 are asking what is going to happen in November and December. So we have put top up payments in place to ensure people stay to the end of March...'

'We discussed increasing payments to hosts, also increasing payments to hosts who offered self-contained accommodation as they would be hosting a larger group, so we think that they should be paid more than £350 as the council will struggle if that breaks down. In terms of move on plans, we had two information sessions where we discussed PRS, converting their current hosting arrangements into lodging agreements if the relationship is working...'

**Tenancy brokerage.** Local authorities have also become more acutely aware of the need to deliver more creative solutions to enable access to the private rental sector. Across the UK, at least one authority, Bristol City Council, has made the ambitious move to guarantee monthly rental payments for landlords letting to Ukrainian arrivals,

as well as giving them a £1,000 thank you payment, providing 6 months' rent in advance, and putting up money to assist with repairs and maintenance.<sup>49</sup> Interviewees noted that they too have had to broker relationships with individual landlords by helping with initial financial hurdles when renting privately:

'...we help set expectations as well. Sometimes people want a 5-bed house, but that is not realistic. We do the final assessment [of private rental properties] and negotiate with the landlord. Because if a Ukrainian tries to rent, they are asked for 6 or 12 months' worth of rent upfront. So we as the council negotiate. We cannot guarantee deposits as a council, but we can give them [landlords] the insurance that protects the landlord from non-payment of rent...'

Similarly, interviewees mentioned they were collaborating with social enterprises that were focused on helping Ukrainian arrivals into accommodation. A specific benefit of these organisations was their crowdfunding capabilities, meaning that larger sums of money could be raised in a relatively short period of time, alleviating the hefty financial burdens of rent deposits and payments up front. The rationale here was clear – thinking long term, and not attempting to fund and rely on innately precarious hosting relationships which could break down for non-financial reasons:

'We have commissioned a service called Beam who also help with guests leaving their sponsors and the PRS [private rental sector] transition.'

'We are going to pilot a project with an organisation that finds affordable tenancies with landlords, and we are using the HFU funding to do that. Under this scheme, the first month's rent would be paid and deposits would be paid too.'

'...We felt that it was better to try to provide the support to get into sustainable and independent living situations than trying to keep sponsorships going that might end for other reasons i.e. relationship breakdown or other family members needing to move home.'

**Relocation.** Another solution adopted by some local authorities was to encourage Ukrainians to accept out of area placements. Though uncomfortable for council staff, and on occasion rejected by Ukrainian families, such placements were seen as the only realistic option when sponsorship arrangements were breaking down, new sponsors were slow to register, and the local private rental market was unaffordable.

'London is expensive all round. For us, we have said that we are looking at a 60-mile radius, because there are no empty properties around here. So, the only option is private rental outside of London, which is cheaper. We have two families looking at Hastings or Norwich, and we are happy to support that...'

Despite councils' attempts to use their resources as best as they could, our interviewees were acutely aware of the limitations inherent in these fixes. Take relocation, for instance. While for some respondents, this was the only viable option at a time when their local authority had no social housing available, others were deeply uncomfortable about the idea of asking Ukrainian families who had already gone through a difficult journey to uproot themselves once again.

'Let's put ourselves in these people's shoes. You're placed in a borough, then sent to another, having to relocate your child's school just because rent is too high. I think it adds trauma to someone who's already experienced trauma. It's a solution, yes, but is it the right one? Will it actually help any refugees settle into the UK? We've seen it, and it depends on each case. If they have family outside of London and want to settle there, that transformation will be easy, because they have links. But having to settle in another area in the UK can add to the trauma.'

In some cases, our interviewees even recounted instances where Ukrainian families themselves were reluctant to consider relocating, given that they had already started to integrate locally, find jobs, and enrol their children in schools. This hesitancy, council officers argued, was amplified by the fact that no one had taken the time to introduce Ukrainian refugees to the harsh reality of London's housing context. The absence of candid conversations on arrival, they explained, had left refugees with overly hopeful expectations about what could be feasible after six months:

'...We have local authorities in our working group that are saying Ukrainians whose arrangements broke down either do not want to be rematched or won't go to temporary accommodation out of borough, but there isn't housing available. People need a sense of what is reasonably possible.'

Issues were also raised with regards to rent brokerage. While a few councils had actively taken the step to support Ukrainian families with rent payments, or commission third party services to do it, for others the solution was not suitable, either because of Ukrainian families' own preferences, or because landlords' reluctance to take on the risk of tenants they perceived as low-income:

'We also thought about rent and deposit guarantees, and we're on the fence at the moment. It's a fantastic idea for certain Ukrainians. But we have these Task and Finish groups with a small number of Ukrainians, we have direct conversations with them. For some, the idea of rent and deposit guarantees was good. For others, it wasn't, because they don't know what the circumstances in Ukraine are, and they don't want to enter a 12-month agreement when they see themselves going back to Ukraine.'

Another major concern raised by our interviewees was that, despite the value and ingenuity of solutions adopted at each local authority level, the lack of a unified approach could create confusion, and different standards among neighbouring areas. This was particularly evident in the case of sponsor payments. In addition, a lack of central direction could lead to the setting of unrealistic expectations or implementing solutions that are not actually scalable:

'[local authority] are paying extra to their sponsors. That in and of itself creates challenges. Will sponsors [in their own local authority] turn around to us and ask why they aren't being paid more?'

'... some local authorities are doing proportionate thank you payments, but because others are not doing it, some hosts are effectively getting more money. It does depend on what your neighbours do, two sponsors on the same road could effectively be funded differently, so we have to have those conversations between different boroughs.'

## Local authorities call for a refugee integration strategy

*'Strategy is another really important point. That's been obvious after looking at asylum seekers, who arrived from all around the world, are placed in two hotels, but haven't even got past the first Home Office goal post. There is a Home Office agency in there looking after the families, but it's obvious they're overwhelmed and not locally connected.'*

*'Having spent the last couple of weeks dealing with asylum seekers in hotels, I can only say that there's a lot going on, a lot of plates to spin, and what we're hearing is very challenging. And we realise that we're doing a lot for Ukrainians that we're not doing for asylum seekers; that's always in the back of my mind; we can't have a very specific set of support for just one group, we want to be fair we have a lot of refugees and arrivals. And even under the Ukrainian population, those who arrived under HFU versus those on UFS.'*

*'I am not sure what the resettlement strategy is in Scotland, but it is inexcusable for central government to treat the Afghan and Ukraine situations as discrete events, and not learn from the former...'*

*'Definitely, that would be very welcome, one rule for all. Think of services, and the fact that people have different entitlements; Afghans had access to public funds, but asylum seekers don't. So I couldn't agree more that the patchwork of schemes and entitlements makes it difficult for local authorities and I think also for, when a system is opaque and complicated, it takes you a while to understand what's the resettlement scheme versus asylum seekers, it makes things more challenging than what they need to be for service delivery, and ultimately for the outcomes of residents we are trying to support.'*

## 7. CONCLUSION

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Faced with the pressure of responding to another humanitarian crisis, councils had organised incredibly quickly, using available resources to deliver on the duties required by DLUHC and the statute book, and in many cases to mitigate the lack of direction from central government. And yet, there was no doubt in our interviewees' minds about the fact that the overall response to the Ukraine crisis could have been better organised.

In this concluding chapter, we summarise respondents' feedback to DLUHC, and reflect on what steps central government should take to better manage refugee integration in the future.

### 7.1. COUNCILS PINPOINT THE LIMITATIONS IN THE GOVERNMENT'S RESPONSE

Overall, the main limitations identified by our ten respondents referred to the following.

**Contradictory guidance regarding sponsor checks.** The guidance received from central government was inconsistent when it came to their role in vetting sponsors and properties. This was visible in the wording of the guidance document, which suggested that checks should be conducted before arrivals, but immediately caveated that by adding "where possible", and it was most evident in the fact that, in practice, visas were awarded to sponsors regardless of whether councils had conducted any checks.

**Inconsistent funding across the scheme.** The discrepancy between the funding allocated to the HFU and UFS was another point of contention, described by interviewees as "unfair", "inexplicable", and "confusing". Without exception, local authorities were well aware of the fact that Ukrainians on the Family Scheme were even more vulnerable than those staying with sponsors, and were puzzled by the fact that DLUHC had chosen to exclude them from support, and continue this exclusion even after the funding announcement made by DLUHC in December 2022.

**Over reliance on sponsors for housing.** Another major point of contention was the over-reliance on individual sponsors. Following the initial flurry of interest at the beginning of the full-scale Russian invasion, many sponsors were looking to exit their arrangements due to costs or other personal circumstances. For ten months, DLUHC's only guidance to Ukrainians and their hosts was to try to continue hosting arrangements, find another host, and if neither of these options was available via these routes, contact the local authority for support. This left hosts and local authorities in fear of a housing cliff edge, and having to devise local solutions to what was clearly a structural problem.

**A fragmented response to refugee integration and housing.** Overall, the contradictions and absence of direction identified by our interviewees at local level pointed to the fact that central government was in real need of a strategy. Interviewees spoke at length about the strange disconnect between the Ukraine Schemes and the Afghan Schemes, implemented just a year earlier; about the peculiar scenario that visa schemes designed to address the same humanitarian crisis

were created and administered by DLUHC and the Home Office, two different government departments with radically different budgets and priorities; but also about the fact that the issues encountered by Ukrainians were part of two bigger systems of managing the integration of refugees, and the affordability of housing. Both of these are hugely complex issues, which could take up years of research to fine-tune implementation. And yet, in our view and that of our respondents, the first step to fixing these issues is to recognise their existence, and commit to making them a government priority.

## **7.2. A BETTER RESPONSE TO HUMANITARIAN CRISES IS POSSIBLE**

Two recommendations can address the challenges identified in this report: implementing a real strategy for refugee integration, and for affordable housing. They are not necessarily new, and we have advocated for this previously. The difference, however, is the level of support they attracted amongst interviewees.

It is important to observe that both recommendations are structural in nature, and are likely to take sustained work by central government. However, it is precisely this bigger picture thinking that local authorities are calling for. Having reflected at length about inconsistencies within the Ukraine schemes and across other responses to humanitarian crises, interviewees are calling for vision. The good news for central government is that following these recommendations would not just be about putting out fires, but about making the UK a safe space for refugees for years to come. There is plenty of scope for innovation moving forward. The question is whether policymakers can seize that opportunity for positive change.

### **7.2.1. A new strategy for refugee integration**

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The government needs a new strategy for integration and resettlement. Though certain aspects of the Ukraine schemes can be praised (including the relatively novel focus on wide-spread community hosting arrangements), the government's current reactive approach to humanitarian crises is insufficient. It is no surprise that those authorities who were seen as leading the way on the Ukraine response had set their teams up early and had learned from their experiences in dealing with the Afghan crisis and indeed, in some cases, to Covid-19. Adopting this strategy could utilise the following principles.

**Coordinate the response to different groups of arrivals.** Over the past couple of years, families arriving from Afghanistan, Hong Kong, and Ukraine, have each been supported through different scheme-specific responses. Operating in this piecemeal, short-term fashion reduces local authorities' abilities to support refugees, it prevents the scaling of good practice, and the more efficient allocation of resources. Notably, it inhibits learning. A new strategy should place refugees' needs at the start and look at resourcing the practices that have been proven to work in the past.

As we saw in this report, previous responses have differed radically within the context of the same humanitarian crisis, a good example being the funding discrepancy between the UFS and the HFU schemes. That's why a national strategy for refugee



integration is required – indeed, the APPG on Refugees has been calling for one since April 2017.<sup>50</sup> This strategy could look at co-ordinating funding responses nationally, moving us away from a per capita funding model to one that supports infrastructure and is more 'place based'.<sup>51</sup> A welcome short term move would also involve appointing a replacement to Lord Harrington as Minister for Refugees, to oversee the implementation of this new strategy.

**Clarify local authorities' roles and expectations.** Too many times, respondents found themselves having to make key decisions, such as supporting Ukrainians under the UFS, or extending sponsor payments, without any direction. A new strategy should better delineate what local authorities are responsible for: in the short-term, when meeting the needs of new arrivals, but also in the long-term, to support refugees' access to sustainable accommodation. Central government should have a more consultative relationship with local authorities, and a more fruitful connection between policy making and policy delivery. This will reduce the number of local authorities that orientate their responses in a temporary manner, in a fashion that is similar to working under a 'fixed-term contract'.

**Coordinate the involvement of different government departments.** Local authorities were dismayed by the seeming disconnect between DLUHC and the Home Office. This, they argued, contributed to the mismatch between safeguarding and visa processing, but also to the glaring discrepancy between funding allocated across different schemes. Furthermore, while DLUHC officials ran regular channels of engagement, communication from and with the Home Office was slower and significantly less frequent. A new strategy is needed to better co-ordinate the response between government departments, including by harmonising the financial resources offered to different groups of refugees and arrivals.

**Refine digital systems that are crucial to scheme delivery.** A simple but relatively impactful change is the refinement of Foundry and Jira, and the ways in which the information contained on visa applications interacts with these platforms. We know that the Home Office and DLUHC have been alerted to some of the issues around these digital systems, but they require expedited resolution. One solution recommended by local authorities is to ensure that only verifiable information is permissible for entry on visa applications, so sponsors' details cannot be used more than once and fake details cannot be used as a means to submit applications and clog up the system. This will help to reduce the backlog of problematic applications, but will also assist in preventing issues such as the approval of visas before sponsors have been subjected to the appropriate checks.

**Reflect.** Too often, interviewees noted, there was a sense that local authorities, government, and regional bodies were reacting in the short-term, and to the best of their abilities, but without the opportunity to have a frank assessment of what worked, what did not, and what could be reasonably scaled. This carries an opportunity cost, as councils which were less confident in their abilities to take the lead in things like PRS support were "sitting on the fence", effectively depriving their residents of forms of support which other local authorities were already offering. It also creates a feeling of uncertainty - even among councils which were more proactive. Overall, respondents welcomed greater leadership from London Councils. While the body was

generally valued for maintaining a feedback channel to DLUHC, interviewees also saw more scope in London Councils reflecting on best practices implemented by their members, with a view to develop a London-wide response.

## Local authorities call for a plan for affordable housing

*'Level up the UFS funding in line with the HFU. Raise the local housing allowance rates and benefits caps on housing. Help support more on the homelessness front with additional funding... The key thing is also the PRS. You can throw all the money in the world at it, but it will not solve the issue of stock. This is why we encourage Ukrainians to move outside of London. But their kids might be at school, they may have found work, and they may not want to move. If all the money in the world was available, I would suggest building another 100,000 homes to deal with this issue.'*

*'The massive word that is flashing in my head is housing. Some kind of coordinated response around housing is needed. [...] The issue with the housing market affects all of us, the fact that landlords can demand lots of money for essentially low standards of accommodation is problematic. If that was looked at through resettlement and integration, that could have a knock-on effect on the broader population. We also know that so many people face horrible housing situations because they arrived here through non-regular routes. We need financial recognition, but also proper thought around policy approaches and regulation in the housing market.'*

*'As we go on in time, the absence of a coherent plan from central government on future housing options for people is already a big issue for us, but it will become bigger. Collectively, the more we can do to pressure for a more coherent response for housing, the better. I have sympathy with DLUHC and Home Office colleagues, we are reaping the long term implications of housing policy.'*

*'... people need a sense of what is reasonably possible, and you can't blame guests if we have never taken the time to explain their options to them, how we can help, and the limits to that help. It should not matter why you are here, people are displaced and we need compassion, but that needs to be framed within realities, because our homelessness teams are not growing to match the need, it is what it is...'*

### 7.2.2. Prioritise housing

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**The government should prioritise the tackling of housing as a national issue.** The UK needs to build more houses, including social housing. This has been so commonly proposed by other stakeholders that it is difficult to bear repeating. But without a radical investment in an affordable housing stock, Ukrainians, other refugees, and a generation of low-income Britons risk being stuck in a vicious cycle of overcrowding and poverty. Recent announcements from DLUHC about the creation of a new 500million housing fund are welcome, but will barely make a dent in the country's actual need for housing. To address the real scale of the housing problem, the government needs to think beyond the narrow perimeter of one humanitarian crisis, and recognise that most refugees' needs are now in fact the needs of millions of Britons.

In London, this strategy could be informed by setting up a separate cross sector multi-stakeholder group that includes government, local government, commercial and community housing providers and community groups, including migrant support organisations.

**Reset LHA rates.** Housing remains particularly inaccessible for benefit recipients. While there is something to be said about the role of inflation and the cost of living more generally, a simple and immediate solution is to review how LHA rates are set. Most benefit claimants today know that the notion that benefits will cover even the cheapest 30% of housing costs is a matter of fiction.

**In the short term, give arrivals a sense of what is possible.** Solving the UK's housing picture will take time. In the short term, however, arrivals need to get a realistic sense of the state of the UK's housing situation, and the options that exist within the social and the private rental sector. This will require more transparency from DLUHC. It will also require difficult conversations with local authorities and regional associations about measures like rent and deposit guarantees, which happen in some councils, but not others; and an in-depth assessment of the practice of offering social housing out of area. While legally possible, out of area relocation remains a contentious option among refugees, council staff, and homelessness charities alike.

Pretending that the current housing situation in the UK doesn't amount to a crisis serves no one, not least Ukrainian arrivals. Acknowledgement, on the other hand, is the first step to solving the issue. This is perhaps why interviewees also supported more accurate information sharing on the topic. The benefit of this is not simply to alleviate the pressure currently placed on local authorities. It is also a mechanism by which Ukrainians can better plan the months and years ahead as they begin to settle in the UK.

## ABOUT WORK RIGHTS CENTRE

Work Rights Centre is a registered charity dedicated to supporting migrants to access employment justice, and improve their social mobility. We do this by providing free and confidential advice in the areas of employment, immigration, and social security, and by mobilising frontline intelligence to address the systemic causes of migrants' inequality. The charity was founded in 2016. Ever since, we have advised over 4,500 people, helped recover nearly £200,000 in unpaid wages and fees, and supported hundreds more to make job applications and secure their immigration status.

Our frontline service consists of two multilingual teams of advisers who operate in London (5 days a week) and Manchester (on Saturdays). Together, the advice team assist an average of 20 beneficiaries a week, with issues which range from non-payment, insecure immigration status, and career advice. You can support their work at <https://www.workrightscentre.org/support-us>

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<sup>1</sup> In this report, the term *refugee* is used to denote the population who are leaving, or unable to return to Ukraine, as a result of the Russian invasion. It is important to note that most Ukrainian arrivals to the UK have not been granted formal refugee status under the Geneva Convention. To learn more, visit <https://www.refugeecouncil.org.uk/information/refugee-asylum-facts/>

<sup>2</sup> UNHCR, 'Ukraine Refugee Situation'. <https://data.unhcr.org/en/situations/ukraine>

<sup>3</sup> Home Office, 'Ukraine Family Scheme, Ukraine Sponsorship Scheme (Homes for Ukraine) and Ukraine Extension Scheme visa data', updated 22 December 2022, <https://www.gov.uk/government/publications/ukraine-family-scheme-application-data/ukraine-family-scheme-and-ukraine-sponsorship-scheme-homes-for-ukraine-visa-data--2>

<sup>4</sup> Department for Levelling Up, Housing and Communities, 'Ukraine Sponsorship Scheme: Visa data by country, upper and lower tier local authority'., published 1 June 2022 [last updated 20 December 2022], <https://www.gov.uk/guidance/ukraine-sponsorship-scheme-visa-data-by-country-upper-and-lower-tier-local-authority#full-publication-update-history>

<sup>5</sup> Vicol and Sehic, 'Six Months on. The UK's Response to the Humanitarian Crisis in Ukraine, and How the Government Can Better Protect Refugees'. <https://www.workrightscentre.org/media/1246/ukraine-report-six-months-on-27-september-2022-final.pdf>

<sup>6</sup> Tapper, 'Ukrainian Refugees in UK Face Homelessness Crisis as Councils Struggle to Find Hosts'. The Guardian, 30 October 2022, <https://www.theguardian.com/world/2022/oct/30/ukrainian-refugees-uk-homelessness-councils-hosts>

<sup>7</sup> Johnston, 'Plan To Double Ukraine Refugee Support Payments To £700 Has Been Shelved'., PoliticsHome, 12 October 2022, <https://www.politicshome.com/news/article/homes-for-ukraine-refugee-support-payment-doubled-shelved> ;

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<sup>10</sup> Department for Levelling Up, Housing and Communities, 'Homes for Ukraine: guidance for councils'., published 18 March 2022 [last updated 5 August 2022], <https://www.gov.uk/guidance/homes-for-ukraine-guidance-for-councils#four-to-6-months-after-guests-have-moved-to-your-area>

<sup>11</sup> Ibid.

<sup>12</sup> Ibid.

<sup>13</sup> Ibid.

<sup>14</sup> Ibid.

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<sup>15</sup> Ibid.

<sup>16</sup> Department for Levelling Up, Housing and Communities, 'Homes for Ukraine: Guidance for sponsors (children and minors applying without parents or legal guardians)', published 15 July 2022 [last updated 5 August 2022], <https://www.gov.uk/guidance/homes-for-ukraine-guidance-for-sponsors-children-and-minors-applying-without-parents-or-legal-guardians#sponsor-approval-process>

<sup>17</sup> Department for Levelling Up, Housing and Communities, 'New over £650 Million Support Package for Ukrainians Sees Increased "Thank You" Payments for Longer-Term Hosts', published 14 December 2022, <https://www.gov.uk/government/news/new-over-650m-support-package-for-ukrainians-sees-increased-thank-you-payments-for-longer-term-hosts>

<sup>18</sup> Department for Levelling Up, Housing and Communities, 'Homes for Ukraine: guidance for councils', published 18 March 2022 [last updated 5 August 2022], <https://www.gov.uk/guidance/homes-for-ukraine-guidance-for-councils#four-to-6-months-after-guests-have-moved-to-your-area>

<sup>19</sup> Ibid.

<sup>20</sup> Ibid.

<sup>21</sup> Housing Act 1996, s 175, 189A, 195(1),

<sup>22</sup> Ibid, s 189B, 193

<sup>23</sup> Children Act 1989, s 17,19,22(3) & 27

<sup>24</sup> Department for Levelling Up, Housing and Communities, 'Homes for Ukraine: guidance for councils', published 18 March 2022 [last updated 5 August 2022], <https://www.gov.uk/guidance/homes-for-ukraine-guidance-for-councils#four-to-6-months-after-guests-have-moved-to-your-area>

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<sup>31</sup> Local Government Association, 'Council support for Afghan resettlement', <https://www.local.gov.uk/topics/communities/refugees-and-asylum-seekers/council-support-afghan-resettlement>

<sup>32</sup> The guidance given to councils on this issue is contradictory. Initially, DLUHC mentions that 'sponsors will also undergo eligibility and suitability checks **prior to any visa being issued...**' (emphasis). Yet, later on in the same guidance, DLUHC recognises the possibility of Ukrainian arrivals slipping through the cracks: 'in cases where the guest(s) has already been issued with a visa but has not yet arrived in the UK, Border Force will attempt to intercept the beneficiary at the border and will contact the council to liaise on providing alternative accommodation... **In cases where the guest(s) has already arrived at the sponsor's household, the council will be responsible for contacting the guest(s) and the sponsor. It is crucial they do this as soon as possible, particularly where there are safeguarding concerns.**' See: <https://www.gov.uk/guidance/homes-for-ukraine-guidance-for-councils#four-to-6-months-after-guests-have-moved-to-your-area>

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<https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/indexofprivatehousingrentalprices/november2022>

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