

# Reset's response to the New Plan for Immigration

On 24<sup>th</sup> March 2021, the UK Government published its [New Plan for Immigration](#), outlining its proposals for reforming the asylum system in the UK. The consultation period for these proposals closes on the 6<sup>th</sup> May 2021.

Our primary purpose as a charity is to grow the size and impact of the [Community Sponsorship](#) programme; we want to see as many communities as possible welcoming as many refugees as possible. Our work is founded on the belief that all of us benefit from welcoming newcomers, and that these benefits are most strongly felt when communities are leading the welcome.

The Government is rightly proud of its track record in resettlement over the past six years. With 20,000 refugees welcomed through the Vulnerable Persons Resettlement Scheme, and the successful launch of the Community Sponsorship programme, the Government has shown that it can deliver successful and ambitious resettlement programmes at scale, and has built an international reputation for doing so.

We are strongly supportive of the Government's desire to strengthen safe and legal routes to the UK for those who are in need of a place of safety, and particularly to grow the role of Community Sponsorship in welcoming refugees. But we are deeply concerned by the Government's proposal to make the support that a refugee receives and the immigration status that they may obtain dependent upon how they have reached the UK. Our view is that this risks creating a two-tier system which will have a significantly negative effect upon the growth of Community Sponsorship.

Growing Community Sponsorship depends upon recruiting more volunteers to sponsor refugees. Since the *NPI* policy document was first published, we have been encouraging Community Sponsors to contact us to express their views. In response to the large number of emails we

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received, and the strength of feeling conveyed therein, we decided to host a call to listen further to the views of Community Sponsors.

On 22nd April, 43 people attended this call. The overriding message was strongly critical of the proposals contained within the *NPI* to reform the asylum system, and particularly the entrenchment of a two-tier approach to the treatment of refugees. Words including ‘disgraceful’, ‘appalling’, ‘preposterous’, ‘illegal’, ‘horrifying’ and ‘barbaric’ were repeatedly used by Community Sponsors to express their opinion of the *NPI* proposals for the asylum system. They told us that this felt like ‘hostile environment tactics’ and that it makes them feel ‘disillusioned’ and ‘angry’.

Already, some sponsors are questioning whether they can remain involved in Community Sponsorship, or whether by supporting a Government programme they are tacitly supporting the rest of the proposals contained within the *NPI*.

From this feedback, it is clear to us that strengthening safe and legal routes like Community Sponsorship is intimately connected with the nature of asylum reform. Community Sponsors are public-spirited people who want to play a part in the immigration system – but only if that system is compassionate and underpinned by respect for human rights. We urge the Government to re-think its approach to asylum reform, putting such values at the core.

On 4<sup>th</sup> May 2021, we submitted our response to the *NPI* online. You can read our responses the open text questions below. [We recommend reading our responses alongside this PDF, containing the text of the questions.](#) This is because the numbering of our responses below corresponds to the numbering in this PDF document. Note that if you are responding to the consultation as an individual, your survey will be numbered differently.

We are publishing our responses in the interest of transparency. Our responses are not intended as a guide.

Please note that we have only answered questions where we felt that we had relevant expertise. We have also abstained from answering questions where we felt that we could not accurately represent our views (we have specified where this was the case).

## Question 3

### Further detail on Question 1

Question 1 asks us to rank how far we agree overall with what is said in the foreword to the *New Plan for Immigration (NPI)* policy document. There are some views expressed within the foreword with which we strongly agree. For example, we share the Government's view that we should take pride in fulfilling our moral responsibility to support refugees fleeing peril around the world. However, we are very concerned that other ideas expressed in the foreword – particularly the idea that the way a refugee travels to the UK should have a bearing on the type of support or immigration status they receive – will negatively impact the recruitment of Community Sponsors and Lead Sponsors. As our primary objective as an organisation is to support the growth of Community Sponsorship, we felt compelled to answer 'strongly oppose' to Question 1.

Our concern is based on the reaction to the *NPI* that we have seen amongst current Community Sponsors. Since the *NPI* policy document was first published, we have been encouraging Community Sponsors to contact us to express their views. In response to the large number of emails we received, and the strength of feeling conveyed therein, we decided to hold a Zoom call to listen further to the views of Community Sponsors. On 22nd April, 43 people attended this call. The overriding message was strongly critical of the proposals contained within the *NPI* to reform the asylum system, and particularly the entrenchment of a two-tier approach to the treatment of refugees. Words including 'disgraceful', 'appalling', 'preposterous', 'illegal', 'horrifying' and 'barbaric' were repeatedly used by Community Sponsors to express their

opinion of the *NPI* proposals for the asylum system. They told us that they felt ‘disillusioned’ and ‘angry’.

Regarding the contents of the foreword specifically, Community Sponsorship group members attending this call were particularly concerned by the use of language that they worried would stoke fear of migrants – particularly those who arrive to claim asylum in the UK. They also firmly rejected any dichotomy between ‘good’ refugees who are resettled and ‘bad’ refugees who claim asylum in the UK. They strongly opposed any attempt to make the level of support or type of immigration status that a refugee receives contingent upon how they have travelled to the UK. Significantly, we were concerned to note sponsors on the Zoom call expressing real doubts about whether they can continue to support Community Sponsorship if it is part of an immigration system that includes the changes to the asylum system proposed in the *NPI*. For a more detailed explanation of the doubts raised by sponsors, please see our response to Question 21.

## Further detail on Q2

Question 2 asks us to rank how effective we feel Statements A-G will be in meeting the Government’s three objectives for reforming the asylum system. We have declined to answer Question 2 because there is no opportunity within the question to contest the Government’s three objectives.

We are supportive of the Government’s second objective: to “deter illegal entry into the UK, thereby breaking the business model of criminal trafficking networks and protecting the lives of those they endanger”. Moreover, we agree that “Strengthening safe and legal routes for those genuinely seeking protection in the UK” (Statement A) can and should be part of achieving this objective. It is clearly preferable that, wherever possible, people seeking protection can reach the UK safely through defined and legal routes.

However, in order to begin to meet the scale of need and actually deter any journeys from occurring, we need an ambitious plan for expanding

and broadening the scale and scope of safe and legal routes to the UK. We are very concerned that we have not seen any evidence in the *NPI* of any real expansion of safe and legal routes. ‘Strengthen’ is an ambiguous term, and we call on the Government to introduce time-bound numerical targets for resettlement as a matter of urgency. We welcome the Government’s decision that refugees resettled through Community Sponsorship will be counted in addition to those resettled via Local Authority-led resettlement, but we need a baseline target for Local Authority-led resettlement in order for additionality to be truly meaningful.

We also note the lack of any specific commitments to create new pathways to complement resettlement, reaching people who would currently be ineligible for resettlement to the UK, and we call on the Government to work with organisations like Reset to develop such pathways. We suggest ideas for how Community Sponsorship could support the growth of complementary pathways in our response to Question 7.

Nevertheless, we stress that even with a significant expansion in the scale and scope of safe and legal routes to the UK, such pathways cannot be a substitute for enabling people to claim asylum in the UK. We support the view conveyed strongly to us by Community Sponsors that the route by which people arrive in the UK has no correlation with their vulnerability or need for protection. We are deeply concerned that positioning safe routes like Community Sponsorship, which rely on public participation with Government programmes, as replacements for a system of asylum will create a context incompatible with the growth of such routes. We have explained our reasoning for this concern in our response to Question 21 below.

## Question 7

### Question 5 response

We have declined to answer question 5 in a multiple choice format because we feel it is ambiguously worded.

Question 5 asks about the importance of linking the number of refugees that the UK resettles to the capacity of local areas to provide help and support. We think that it is important that numbers are linked to the capacity of local areas, but we believe that central government has a vital role in helping to create capacity at a local level. We also believe that central government has an important role in signaling to local governments the scale of its ambition for resettlement. Indeed, we see the success of the VPRS scheme, which saw more than 20,000 refugees resettled, as being due in part to the clear direction and ambition to welcome refugees from central government. We therefore urge the Government to use this successful approach again and set time-bound targets for the total number of refugees that the UK will resettle. We have explained this view in more detail below in our suggestions for how to improve the Government's proposal to maintain a long-term resettlement commitment.

Question 5 also asks about the importance of four priority categories for refugees arriving via safe and legal routes. We believe that people falling into two of these priority categories (family reunion and labour mobility) could be successfully welcomed via Community Sponsorship, and that opening the Community Sponsorship programme to people within these priority categories could present a significant opportunity to grow the scale of community-led welcome. We will expand upon our thoughts below, but we want to stress first of all that any expansion in the scope of safe and legal routes to include family reunion or labour mobility must not replace existing routes to resettlement based on vulnerability criteria. Rather, these routes should function as complementary pathways in order to increase the total number of refugees able to find safety in the UK.

The first of priority category which we believe could support the growth of Community Sponsorship is that of family members of refugees already in the UK. Reset conducts regular Post Arrival Support Visits with all Community Sponsorship groups and sponsored refugee families. By a

significant margin, the issue raised most frequently with Reset by sponsored families is how they can bring their relatives in their wider family unit, who are also in need of protection, to the UK. There is also a clear appetite from Community Sponsorship groups to support the families they have welcomed to go on to sponsor their own wider family unit. Furthermore, family reunion is responsible for the majority of refugee sponsorship cases in Canada – the only national context in which sponsorship occurs at scale – suggesting that enabling people to welcome their family members could lead to a significant expansion of the programme in the UK.

The second priority category for scaling community-led welcome is refugees who have skills that enable them to access employment in the UK, leading to better integration outcomes more quickly. We are currently planning a pilot of community-led welcome for displaced people arriving to work in the UK in partnership with Talent Beyond Boundaries (TBB). This will involve a 6-month commitment from volunteers, rather than the 1 year currently required from Community Sponsors, on the basis that the level of support required will be lower. We think the relatively low commitment in comparison to Community Sponsorship in its current form could attract a greater number of sponsors, and thereby increase the total number of refugees welcomed by communities.

Finally, we would like to explore how eligibility criteria for Community Sponsorship should sit in relation to eligibility criteria for mainstream resettlement. As we have explained, we support the use of vulnerability criteria to determine eligibility for resettlement, which is by far the most significant safe and legal pathway to the UK. Currently, eligibility for Community Sponsorship is determined in exactly the same way as for mainstream resettlement, although the two programmes have significant differences. For example, refugees resettled via mainstream resettlement receive five years of integration support, whereas those resettled via Community Sponsorship receive just one year of integration support. Community Sponsors have told us that they face challenges in enabling effective integration support for the very most

vulnerable refugees within a year. This certainly has implications for scaling Community Sponsorship as, in such cases, Community Sponsorship groups typically continue to support the family beyond the one year timeframe and therefore they are not ready to welcome another family quickly. For that reason, we think it is right to explore how Community Sponsorship can be most effectively deployed within the cohort selected for resettlement in the UK, and how Community Sponsors might work in partnership with Local Authorities and resettlement agencies to welcome the most vulnerable.

## **Question 7 response**

We have given our view on the effectiveness of each of the proposals in the multiple choice section of Question 4. We are only expanding here on the proposals where we have particular thoughts on how they might be improved or the challenges they may pose.

### **A – How the proposals in Chapter 2 could be improved**

#### **Long-term commitment:**

We welcome the proposal for a long-term commitment to refugee resettlement. We also welcome the move towards a global resettlement scheme, ensuring a full range of those in need are represented. When Community Sponsorship operated under the Vulnerable Persons Resettlement Scheme (VPRS), we were regularly asked by prospective sponsors whether they could welcome refugees who fell beyond the scope of the VPRS, and we believe this move towards a global scheme is a popular change.

However, this proposal could be vastly improved by setting an ambitious, time-bound target for the number of refugees that the Government will resettle. We are very pleased that the Government has agreed that refugees welcomed through Community Sponsorship will be counted in addition to those arriving through Local Authority-led resettlement, but the impact of additionality has been muted by the lack

of targets for Local Authority-led resettlement. Since the UKRS was announced by the Government in March 2021, Community Sponsors have consistently voiced their concern that the overall number of people welcomed will decrease without a target for government-led resettlement, and that this means additionality is not meaningful in practice.

We understand that the Government is looking to be led by capacity at Local Authority level, but we believe that there is a need here for strong leadership from central government – both to create capacity locally where it is lacking, and to signal a high level of ambition for resettlement by setting stretching targets. Indeed, we see the success of the VPRS scheme, which saw more than 20,000 refugees resettled, as being due in part to the clear direction and ambition to welcome refugees set by central government. We therefore urge the Government to use this successful approach again and set time-bound targets for the total number of refugees that the UK will resettle. Over the course of the VPRS, the UK came to be seen as a global leader in resettlement, and the Government jeopardizes this reputation if it fails to put targets in place.

### **Community Sponsorship:**

We really welcome the Government's support of Community Sponsorship and we share the Government's desire to ensure that more refugees can benefit from the support of a welcoming community. To increase the scale of Community Sponsorship, we make the following recommendations:

- ***Explore allowing people to sponsor family members in need of protection:*** Reset conducts regular Post Arrival Support Visits with all Community Sponsorship groups and sponsored refugee families. By a significant margin, the issue raised most frequently with Reset by sponsored families is how they can bring their relatives in their wider family unit, who are also in need of protection, to the UK. There is also a clear appetite from Community Sponsorship groups to support the families they have welcomed to go on to sponsor

their own wider family unit. Furthermore, family reunion is responsible for the majority of refugee sponsorship cases in Canada – the only national context in which sponsorship occurs at scale – suggesting that enabling people to welcome their family members could lead to a significant expansion of the programme in the UK.

- ***Reviewing Local Authority consent:*** We are already in conversation with the Home Office’s Community Sponsorship team to explore ways to ensure that obtaining consent from Local Authorities does not unduly delay Community Sponsorship groups from welcoming refugee families. Moreover, it should be noted that multiple Community Sponsorship groups have been prevented from welcoming refugee families by Local Authorities refusing to grant consent. We are keen to explore creative solutions to this problem, in partnership with the Home Office and Local Authorities.
- ***Growing Lead Sponsor capacity:*** By underwriting Community Sponsorship applications, Lead Sponsors play a critical role in Community Sponsorship. Their capacity to take on more applications underpins the capacity of the entire programme. We are therefore considering options to grow the capacity of Lead Sponsors – both by increasing the overall number of Lead Sponsors and by developing the capacity of existing Lead Sponsors. There are a number of levers to consider here: first, methods of drawing in new Lead Sponsors; second, ensuring that the trust placed in Lead Sponsors by the Home Office is commensurate with the legal obligation and devolution of risk placed on Lead Sponsors through their Sponsor Agreements with the Home Office; and third, resourcing of Lead Sponsors.

**A new means for the Home Secretary to help people in extreme need of safety**

We find this proposal very vague. If it refers to the potential creation of a humanitarian visa or corridor, we would be supportive in principle pending further detail. We believe there is potential for Community Sponsorship groups to offer support to those who arrive in the UK through a humanitarian corridor, as modeled by the Federation of Protestant Churches in Italy, but we also recognise that sponsors may feel uncomfortable about offering their support in one part of the asylum system whilst not being able to provide such support for those arriving spontaneously.

### **B – Potential challenges in the approach the Government is taking to help those in genuine need of protection**

We support the proposals to review family reunion, grant immediate indefinite leave to remain, and enhance integration support for refugees, but we are gravely concerned by the Government's proposal that such improvements be dependent upon how a person arrives in the UK, even where they are found to have a genuine asylum claim. Our view is that this risks creating a two-tier system and wrongly suggests that there are 'deserving' and 'undeserving' refugees.

We believe that such a two-tier system will make it much harder to grow Community Sponsorship. Scaling Community Sponsorship depends upon recruiting more volunteers to sponsor refugees, and more charities to act as their Lead Sponsors. Based on the responses to the *NPI* that we've heard from Community Sponsors and Lead Sponsors thus far, we have serious concerns that a two-tier system will significantly hamper recruitment. We expand upon our reasoning for this position in our response to Question 21.

## **Question 10**

We are not experts on family reunion and so we are not answering the majority of the questions in this section. However, we want to briefly highlight a piece of research that we conducted in 2020 in partnership with Social Finance and Home for Good looking at the feasibility of applying Community Sponsorship to welcoming UASCs. The model

proposed through the research involved volunteers setting up and running a local supported lodging scheme. They would recruit local carers and engage the community to provide wraparound support to both young people and carers. In each case, the Local Authority would act as the corporate parent to unaccompanied minors, and each hub would be supported by a central organisation, like Reset, providing training and support.

As a result of Covid-19, we put this work on pause and have not been able to test the model. However, we were able to interview current and prospective Community Sponsors about their thoughts on the model, revealing that sponsors are very supportive of the idea of supporting UASCs but that they have big questions about the feasibility of the model. Volunteers noted the difficulty of recruiting people with appropriate skill sets to support unaccompanied young people, and the high level of commitment needed to run a local supported lodging scheme, for example.

Our view is that it would be possible to apply Community Sponsorship to supported-lodging placements, but that this is not the most obvious area for applying new forms of community-led welcome.

## Question 21

We are very concerned that this differentiated approach to asylum claims will create a context in which it is difficult to scale Community Sponsorship. There are 3 main reasons for our view: first, we fear that the association of Community Sponsorship with the hostile environment will make it harder to recruit sponsors; second, we believe that current and potential sponsors are likely to divert their support from resettled refugees towards those refugees who arrive in the UK to claim asylum if the latter are cut off from other forms of support; and third, we note the concerns of Community Sponsors that the differentiated approach will heighten fear and mistrust of migrants in their neighbourhoods, making it harder for volunteers to gain support for setting up Community Sponsorship groups.

We will explain each of these issues in more detail:

## **Reputational damage to Community Sponsorship**

Growing Community Sponsorship depends upon recruiting more volunteers to sponsor refugees. What we know so far about the people most likely to sponsor refugees is that they are motivated by a deep compassion to help anyone in need. Research that we carried out in 2020 shows that they do not distinguish between people on the basis of how they arrive in the UK. Anecdotally, we have found that sponsors are often disappointed when they learn that refugees who have made their way to Europe are ineligible for the programme, and we know from further research that the image of Alan Kurdi continues to be a huge source of motivation for people looking to sponsor refugee families.

We were therefore unsurprised by the feedback we have received from sponsors – both via email and verbally at our Zoom call on 22<sup>nd</sup> April – regarding the differentiated approach proposed by the Government. Overwhelmingly, sponsors are strongly opposed to making certain types of support or status for refugees contingent upon routes of arrival. They told us that this felt like ‘hostile environment tactics’. They told us that it makes them feel ‘disillusioned’ and ‘angry’. Already, some are openly questioning whether they can remain involved in Community Sponsorship, or whether by supporting a Government programme they are tacitly supporting the rest of the proposals contained within the *NPI*.

As the Home Office is aware, participation in Community Sponsorship has already been affected by the association of Community Sponsorship with certain Home Office policies. For example, some Community Sponsorship groups have been hesitant or put off proceeding with Community Sponsorship due to the requirement to sign up to the Government’s Prevent programme. It is Reset’s view that punitive measures towards those seeking asylum will only increase feelings of mistrust from prospective sponsors towards the Government, negatively impacting upon the willingness of volunteers to play an active part in the immigration system.

## **Diversion of volunteer support from resettled refugees to those excluded from state support**

Drawing on our daily interaction with Community Sponsors, we know that many sponsors already worry about the unequal levels of support received by some refugees over others. They frequently voice concerns about providing wraparound support to one resettled family while other refugees do not have access to such support. Sponsors really grapple with this, and we've seen them extend their English language support to other resettled families in their local area, run a food bank for people seeking asylum, and use their spare rooms to host people seeking asylum, or who have recently gained refugee status. We also have evidence of people interested in sponsoring refugee families deciding not to get involved in Community Sponsorship because they believe that their time could be better spent supporting those seeking asylum already in their local area.

The proposals set out in Chapter 4 of the *NPI* will see those granted refugee status after seeking asylum left with No Recourse to Public Funds and only temporary protection status. Based on our knowledge of sponsors' motivations and concerns, we believe it is likely that some sponsors will seek to devote their energy towards those with No Recourse to Public Funds rather than resettled refugees, as it is highly likely that those with No Recourse to Public Funds will be in the position of greatest need.

## **Heightened fear and mistrust in communities**

At our Zoom call on 22<sup>nd</sup> April, Community Sponsors conveyed to us their concern that the differentiated approach proposed by the Government will heighten mistrust of migrants by painting those arriving to claim asylum as opportunists and criminals. They fear that this will stoke divisions within their neighbourhoods.

Community Sponsorship is perhaps most impactful in neighbourhoods that lack social cohesion and in which fear of migrants is commonplace.

In such contexts, it can take real courage for volunteers to set up a Community Sponsorship group, put a poster in their window advertising their support for refugees, and post on local facebook groups about why they want to welcome refugees to their local area. Sponsors expressed concern that heightened tensions would make the task of setting up a Community Sponsorship group much harder, and would make them fear that a refugee family might not be safe in their neighbourhood, thereby preventing them from applying to the programme.

Community Sponsorship is a serious undertaking. It asks a great deal of volunteers and Lead Sponsor organisations, who put in months of work preparing applications before they get the opportunity to welcome a family. Making the scheme harder will negatively impact the number of people who feel able to get involved.

## Question 45

We are concerned that the time scale for the consultation has been insufficient. The consultation response period has lasted for only 6 working weeks, and has included Easter school holidays, a May bank holiday, Ramadan, and an election period in which officials are more restricted as to the views that they can publicly express. We also have concerns around the wording of some of the questions within in this consultation and have declined to answer certain questions where we felt that we could not accurately represent our views (we have specified in open text boxes where this was the case).

We heard strongly from Community Sponsorship groups in our zoom call on 22<sup>nd</sup> April that they had little to no trust in the consultation process. Words including 'dishonest' and 'sham' were repeatedly used to describe their views of the consultation. Our decision to hold the Zoom call was partly taken in response to the number of emails we received from people who were confused by the consultation process and intimidated by the style of the online portal and the length of the questionnaire.

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During our Zoom call on 22<sup>nd</sup> April, a number of sponsors also expressed anger about what they considered to be a deliberately misleading use of statistics in the *NPI*, particularly in Chapter 1.