

5th May 2018

Sent via email: IntegrationStrategy@communities.gsi.gov.uk

Dear Sir/Madam,

The Migrants Rights Network (MRN) values the opportunity to respond to the Government's Green Paper 'Integrated Communities Strategy'

MRN was established in 2006, to fill a public void in the discussion and understanding of migration matters. MRN is a national umbrella body, with a following of over 50,000 individuals and agencies (through social media and a weekly newsletter). The organisation's current business plan focuses upon three key areas, understanding and profiling a rights based approach to migration, supporting the development of a regional and local understanding of migration, and drawing together work through the development of collaborative relationships.

Broadly our response to the strategy is one that continues to be alarmed by the over emphasis on problematising 'migration and migrants' as an issue of concern. We believe that government continues to be negligent in its own duty of fostering good relations between communities (by stoking hostility) and enabling inequality (by exempting migrants from so many domestic protections such as the Equality Act and Data Protection regulations) These we believe to be justly unfair.

We would also draw to Government's attention its previous failure to take account of warnings over the 'hostile environment' as a barrier to integration. We have seen the disastrous impact of this on the Windrush generation and others it. It is to this Government's continued shame that consultation responses are not taken seriously or the concerns and risks raised in them by specialist stakeholders adequately addressed.

We feel the questions posed in the document are deliberately narrow and ill defined, to elicit a specific response, and we will therefore summarise our comments under the broad headings of the strategy.

Leadership

On the issue of leadership we welcome the connectivity with the Equality Duty. We would draw Government's attention to the success indicators in the section on Measuring Success and suggest that these must be open to independent verification and scrutiny from communities. The perception of 'integration' could be viewed as similar to how public the public view 'community safety'. Understanding is born from personal encounters or second hand anecdotes, that emphasis negativity as opposed to positivity. The framework for measuring success must take this into account, so as not to stoke or amplify public tensions.

We welcome the recognition of the critical role of local authorities in addressing integration. However again we would say that there needs to be mandatory core training on the

distinction between equality (as a legal duty), cohesion (as an aspirational goal) and integration. The three components are inter-related and not the same. This needs to be better understood by policy makers at the local level, in order that deficits in provision in one area are not allowed to develop. This is even more likely in the context of reduced budgets for local authorities, where councils may have attempted to define, reconfigure and badge activities under a broad sweep of 'cohesion' and fail to meet their obligations to address equality and integration. This needs to be addressed through training for council staff, councillors as well as supported through regulatory inspections. Double accounting in this area must not be allowed to happen.

We would also suggest that in the context of 'migration' leadership teams need to be able to divorce the structural issues around migration as distinct from those of race and ethnicity. We also see a role for the health leadership and police in such matters, but public confidence in such agencies amongst the migrant community is reliant on effective firewalling between enforcement practices and access to services. The hostile/compliance environment has sharply brought that into focus. More needs to be done, and with some urgency, to address how migrants can equally engage as citizens.

Supporting new migrants and resident communities

As the only national migrants rights organisation, we remain concerned at how to often migrants are viewed as 'problem' in discussions of integration. Little account has been taken of the need to actively engage migrants into established structures. For example local politics, civic organising (with some notable exceptions) tenants and residents association, community safety panels, rarely if ever assertively target migrant communities.

We also note the broad distinction drawn in the document between migrants and refugees, and no mention being made of undocumented migrants or the impact of Brexit on host and EU communities. This we believe to be a serious oversight, that if not addressed will leave any subsequent strategy redundant. The strategy has inadvertently assimilated all migrants into a specific class, and ignored that at a very basic level the right to access ESOL provision is controlled and defined by an individual's immigration status.

There needs to be a discussion about the point at which integration begins for new residents, and we would suggest that the continued use of the no recourse to public funds condition to barring people from public services and financial support is a serious hindrance to integration. Further work and clarity is also needed around the regulations related to volunteering and migrants. There is still considerable confusion, and is an area we anticipate will be acutely affected by Brexit. We look to the Government for some guidance on the issue of volunteering, especially when it is often viewed as a key element of 'integration'.

Education and Young People

MRN would continue to argue that many young people with irregular immigration status are disproportionately affected by a lack of opportunity to integrate. The extortionate cost of British Citizenship applications (and regularisation applications), has been a barrier to many

young people securing their status. This needs to be addressed. Local councils in our experience have far too often neglected unaccompanied minors and young people without regular immigration status in their care. This often reaches a crisis at the age of 18 when such people find their future options limited and restricted by virtue of a lack of status.

Left in such situations, they are more likely to become NEET (Not in Education, Employment or Training) or susceptible to harmful practices or serious youth violence.

We note the green paper talks at length about the formal and informal education system as a point of integration. We would suggest that schools can do more to aid integration by involving the parent/carer body within activities and also by addressing and encouraging the reporting of hate crime/incidences and bullying based on migration status. Currently, there is a clear irony between a regulatory framework that prizes the teaching of British values of 'tolerance' but fails to address adequately how such tolerance is enacted and enabled. This seems to us to be a clear deficit in the thinking around schools addressing integration in a clear and transparent manner.

Boosting English Language Skills

MRN welcome the commitment to boosting English language skills, but would draw attention to the over reliance in many places on conversational English. We would fully endorse national campaigns for more quality control around the teaching of English and a move to accredited learning.

We would also call for greater and improved of basic literacy skills for example for the Roma community.

Places and Community

As stated elsewhere we believe that there is an opportunity for migrant integration in particular to engage with place-making. Currently place making initiatives have not focused on how migrants engage with the democratic process of engagement with public services and regeneration. Whilst such concepts maybe new for some communities of migrant, we believe that the opportunity to better understand how a locality operates and how you can influence its ongoing development is essential to the discussion of integration.

It is notable that none of the Controlling Migration Funds, despite their short sighted vision and emphasis on host communities has adequately looked at the issue of the role of migrants in place-making. This is an issue that we have also been keen to take up with independent funders based on our own very successful Outside Project (that empowered migrant leaders to look at issues in five high voting Brexit areas)

Increasing Economic Opportunity

We fully endorse any commitment to increasing economic well being for migrant communities. The suggestions and examples given in the study reiterate a model of

'resilience' based on access to the labour market. We would respectfully remind the authors that is not the case for some categories of migrants, and their lack of access to employment opportunities and public funds is a serious hinderance to engagement and integration.

We would ask the Government to look in particular at the futility to applying the no recourse condition to women with the right to remain and young children. Without even access to the childcare offer, they are unable to work, and as such are left very often in continued destitution, dependent on social services and prone to exploitation. The long term cost to the public purse is disproportionate and limits the opportunity for both parents/carers and children to develop social and bridging capital.

Rights and Freedoms

MRN remains concerned that the phrasing of the rights and freedoms debate is at odds with the very real disenfranchisement of the migrant experience. We would ask for

1. A return to a broader scope for legal aid that enables and supports individuals to have a denial of an access to rights addressed
2. A commitment to looking at the impact of the data exemption bill on the right to access justice for migrants. Again we believe this will be a disproportionate cost for government, that is contrary to the intent of the green paper and that would hinder integration
3. A reduction in immigration and Citizenship application fees
4. A commitment to 'firewalling' between agencies such as the police and immigration enforcement. We believe and have evidence to suggest that this is a barrier to reporting for victims of crime, and in particular those affected by hate crime and domestic violence.

We believe that this needs a broader cross government review and lies at the very heart of how successfully migrants can and cannot integrate.

Measuring Success

On the issue measuring success, we welcome the Government's commitment to evidencing its progress on this matter. However we remain concerned that the indicators identified to date are limited to an administrative understanding of the processes of integration, as opposed to the very real lived experiences of integration of migrant communities.

In conclusion, we would welcome the opportunity to continue discussions with government on the integration of migrants, and in particular the regional variation and distinction between urban and rural populaces, the need for a better understanding of integration post Brexit and the need to review the structural restrictions of the immigration system that stand in stark contradiction to the shared aspiration to develop integrated communities.

Yours sincerely,



Rita Chadha
Director