

A PRISON WITHOUT WALLS

ASYLUM,
MIGRATION AND
HUMAN RIGHTS

Housing4All
June 2019



FOREWORD

We are Housing4All. We are a group campaigning to ensure that all people seeking asylum are given the opportunity to lead dignified and secure lives. Housing4All was formed, back in 2016, because we saw the human rights of people in the asylum seeking community being denied. We saw people in our community suffering enforced destitution and poor housing conditions at the hands of the state, the same state we are asking for protection from the persecution we have previously faced.

As the seemingly unending asylum process drags on, we have experienced more challenges and so we, as Housing4All, have broadened our campaign. We continue to use a human rights based approach to challenge the denial of our rights by raising awareness of issues including enforced destitution, poor housing conditions, food poverty, children's issues, mental health and the right to work.



Housing4All is the rising voice for asylum seekers in the north of Ireland. It is a place where we can come together to talk about our issues, take action together, refuse isolation and build solidarity. This report gives some idea of the struggles we, as people seeking asylum, are facing. However, this report is not all doom and gloom, we have identified ways in which decision makers and duty bearers in the north of Ireland can act to protect our rights using devolved powers in spite of the Home Office's Hostile Environment policies.

In 2018, Phillip Alston, United Nations Special Rapporteur on Extreme Poverty and Human Rights visited our group as part of his UK country visit. We explained the situation for asylum seekers in Belfast to him and this is what he said...

"Destitution appears to be a design characteristic of the asylum system. Asylum seekers are banned from working and limited to a derisory level of support that guarantees they will live in poverty. The Government promotes work as the singular solution to poverty, yet refuses to allow this particular group to work. While asylum seekers receive some basic supports such as housing, they are left to make do with an inadequate, poverty level income of around £5 a day."

This quote from Alston perfectly encapsulates the deliberately punitive asylum system created by the Home Office. Housing4All want all people seeking international protection to be

treated fairly, with dignity and respect, as legally required by international standards. The duty bearers and decision makers of our devolved political institutions have the power to protect our rights through legislation, policy, and practice that counters the Home Office's Hostile Environment policies. We call upon them to implement the recommendations of our report.

Housing4All is supported by Participation and the Practice of Rights (PPR). PPR is a human rights organisation; it was established in 2006 by the late Inez McCormack, trade union leader and human rights activist. PPR supports a range of marginalised groups, across several jurisdictions, to use human rights tools to realise their social and economic rights.

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OUR STORY SO FAR

In 2016, Housing4All began campaigning to end destitution amongst the asylum seeking community in Belfast. The issue being that in the UK, unlike in other EU countries, if a person's claim for asylum is refused then the accommodation and financial support provided by the Home Office is stopped after 21 days even if they are preparing an appeal. As asylum seekers are barred from accessing public funds by UK law^[1], they are not eligible to access emergency accommodation funded by the state. The result is enforced destitution, which further risks exacerbating the physical, mental, and emotional trauma suffered by many during the course of their flight.

In the absence of any monitoring by the state as to how many asylum seekers had been made destitute as a result of this policy, Housing4All decided to design human rights monitoring surveys which were carried out with 36 destitute asylum seekers in Belfast. In April 2016, we launched our first report "A Place of Refuge? Human



[1] <https://www.legislation.gov.uk/ukpga/1999/33/section/115>

Rights for Some: A Monitor of Homelessness Amongst Destitute Asylum Seekers[2]". The research found that:

- 63% of respondents stated that they had been homeless more than once;
- 87% of respondents stated being homeless adversely affected their mental and physical health.

It was clear from our research that these policies were having a devastating impact on people seeking asylum, so we set about lobbying the NI Executive to prevent destitution through legislative, administrative, and policy change which was, and still is, within the power of the Department for Communities and Northern Ireland Housing Executive to do as housing is a devolved matter.

Our campaign to end destitution was supported and endorsed by MLAs from Sinn Féin, SDLP, Alliance Party, the Green Party, People Before Profit, and the Ulster Unionist Party.

We continued to lobby the NI Executive to end destitution amongst the asylum seeking community, whilst also developing our own pilot project to provide accommodation to destitute asylum seekers which was launched in September 2018. The project, which is a partnership between Choice Housing Association, the Community Foundation for Northern Ireland (CFNI), East Belfast Mission (EBM), Participation and the Practice of Rights (PPR) and Housing4All, provides accommodation

and a weekly allowance of £37.75 to four destitute female asylum seekers. The project also received funding from Embrace NI to furnish the flats and has widespread support from across the sector.

This pilot accommodation project has been a huge success. Those who have been accommodated all reported that their physical and mental health had improved, and three out of the four women found that having somewhere safe and secure to call home has given them the strength and ability to re-engage with the asylum system.

Despite the successes of this pilot project, the Department for Communities and the Northern Ireland Housing Executive shamefully refuse to use their existing statutory powers to take measures to end destitution amongst the asylum seeking community.

Alongside the campaign to end destitution, Housing4All campaigned hard to ensure that accommodation allocated to asylum seekers by the Home Office met international, local, and contractual standards. Frequently, Housing4All heard reports of issues in accommodation including; mould and damp, unaddressed maintenance issues, and intimidation from contract providers. Through Freedom of Information Request, Housing4All were able to obtain a copy of the COMPASS contract[3] which we used to develop human rights checklists for asylum

[2] <https://www.pprproject.org/a-place-of-refuge-report-calls-for-action-from-executive-to-end-homelessness-and-destitution>

[3] <https://www.pprproject.org/nass-national-asylum-support-service-contract>

seekers to monitor standards in their accommodation. Housing4All also used the contract to assist asylum seekers to make human rights complaints about their accommodation and lobbied both the Northern Ireland Housing Executive and Serco as the contract providers to take action.

Despite this, Housing4All saw that things were not improving and decided to survey members of the asylum seeking community again, this time covering a wider range of issues. In November 2018, Housing4All surveyed 70 asylum seekers in Belfast, the results of which are presented in this report.

SCHEDULE 2
STATEMENT OF REQUIREMENTS

COMPASS PROJECT

Schedule 2

ACCOMMODATION - STATEMENT OF REQUIREMENTS

[Note: Any references within this document to existing or proposed representative groups e.g. Regional Strategic Migration Partnerships (RSMP) and GP Practices are subject to change]

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Annex. B Standards

B.1 Accommodation Standards

B.1.1 There are 4 distinct levels for the standards of the accommodation to be provided for the use of Service Users. These levels are:

- B.1.1.1 Safe;
- B.1.1.2 Habitable;
- B.1.1.3 Fit for purpose;
- B.1.1.4 Correctly equipped

B.1.2 The Subcontractor is required to ensure that all accommodation used to accommodate Service Users under this Contract at all times meets the required standards set out in this Schedule 2. For the avoidance of doubt O&S shall have no responsibility whatsoever for any damage to or loss of any assets, premises or property of the Subcontractor which is caused by any Service User, and any such damage or loss shall not affect the Subcontractor's obligations to comply with the provision of this Contract.

B.2 Safe accommodation

B.2.1 The following criteria will result in accommodation being regarded as **Unsafe** and requiring the immediate vacation by the Service Users:

- B.2.1.1 Gas leak;
- B.2.1.2 Structural instability;
- B.2.1.3 Flooding or free standing water within the accommodation;
- B.2.1.4 Water penetration through the structure of the accommodation resulting in pooling;
- B.2.1.5 Damaged or friable asbestos linings or insulation products;
- B.2.1.6 Fire damage;

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RECOMMENDATIONS

DESTITUTION

Recommendations:

- Department for Communities and Northern Ireland Housing Executive cease their compliance with the disgraceful and inhuman enforced destitution policies of the UK Home Office, which deliberately prevent people from accessing many of the most basic human rights to which they are entitled. Using devolved legislative, administrative and policy development powers, both authorities should collaborate to develop alternatives to uphold the rights of asylum seekers, beginning with the removal of barriers for people accessing emergency accommodation.
- Department for Communities and the Northern Ireland Housing Executive scrap their indefensible policy of refusing to grant permission to Housing Associations to use properties unavailable for the social housing waiting list to provide accommodation to destitute asylum seekers.

Open Call to Allies:

- Housing Associations with charitable objectives, solicitors, advocates, and other supporters join Housing4All's "End Destitution" coalition to develop practical initiatives and lobby for change at various levels of the state and public administration.

*"Nobody should
be homeless,
particularly
asylum seekers
who don't have a
means of
supporting
ourselves
because we are
not allowed to
work. It's out of
our control"*

RECOMMENDATIONS

HOUSING CONDITIONS

Recommendations:

- Mears Group adopt a 'zero tolerance' approach to bullying and intimidation of asylum seekers by staff including robust procedures respecting the right to privacy for asylum seekers and investigating reports of abuse.
- Mears Group maintain regular inspection and reporting of properties to ensure they meet contractual requirements and human rights standards. These records are made available to local authorities, devolved departments and to the public under Freedom of Information request in the interests of transparency and public accountability.
- Mears Group work with local health authorities to provide assessments ensuring that allocated housing is suitable for people's physical and mental health needs (see Mental Health Recommendations below). All residents to be provided with a pre-allocation induction, with interpreters, outlining their rights, including how to engage with the complaints process, and provide information on local services.

Open Call to Allies:

- Third sector organisations work in partnership with Housing4All to support asylum seekers asserting their housing rights through monitoring, exposing substandard conditions, and ensuring problems are resolved.

*"They think we
will have too
much liberty if
we are given the
chance to see
the house or area
before we move
in"*

RECOMMENDATIONS

FOOD POVERTY

Recommendations:

- Home Office end their policy of enforced destitution and increase financial support provided to asylum seekers to be in line with social security benefits.
- Home Office amend their policy so that Section 4 support is available to be withdrawn as cash in the same way as Section 95 support, removing barriers to people accessing essential items.
- Belfast City Council and Department for Communities establish a sub-committee in the following 2019/2020 term to develop plans to introduce a digital money scheme (similar to the MONI scheme in Finland) to pay additional financial allowances to asylum seekers outside of Home Office support. This scheme would give people more resources, more autonomy, freedom from Home Office covert surveillance, and a digitally verifiable identity akin to a bank account.
- Department for Communities provide funding for free school meals during school holidays, as this is a time when asylum seeking families struggle most to feed their children.
- Belfast City Council establish a sub-committee in the following 2019/2020 term to develop plans to promote an Aspen Card discount scheme among local businesses.

Open Call to Allies:

- Third Sector organisations work in partnership with Housing4All to develop culturally appropriate and healthy donation lists for food banks to circulate to their donors.
- Food banks work to promote a culture of dignity and respect, allowing people to 'shop' for food rather than be given pre-packed parcels. Food banks could operate a system similar to the Khora Free Shop in Athens, which gives people vouchers that allocate them a certain number of items by category, which they can spend in the store.
- Local businesses implement a discount scheme for holders of an 'Aspen card', the card used to pay Home Office support. It could operate similarly to the 'student discount' scheme which already successfully exists across Europe.

"We don't have enough money so we can't buy our own food"

RECOMMENDATIONS

CHILDREN'S ISSUES

Recommendations:

- Currently the school uniform allowance pays a maximum of £36 for primary school pupils and a maximum of £56 for secondary school pupils, plus a maximum of £22 for a physical education kit available to secondary school pupils only. Department for Communities increase the school uniform allowance to at least £100 per annum and provide another allowance if the child moves schools.
- Department for Health provide appropriate mental health assessments and support for children who are in families seeking asylum.
- Belfast City Council confidentially provide free places for children to attend extra-curricular activities and summer clubs so that children in families seeking asylum can participate in activities with their peers without discrimination.
- Department for Education provide free bus passes for all children from asylum seeking families travelling to school by removing the qualifying distance requirement – currently standing at four miles (round trip) for primary school pupils and six miles (round trip) for secondary school pupils.
- Mears Group adopt a policy whereby school age children are not

relocated away from their place of study without exhausting normal statutory processes which apply to all children. Such processes are aimed at minimising disruption and protecting the health and well-being of the child concerned. Failure to enforce these protections is an officially acknowledged act of harm to the child.

Open Call to Allies:

- Parents, teachers, charities, and other support and advocacy organisations pledge your support to the recommendations in this report and join Housing4All in calling for the rights of children in families seeking asylum to be protected.

“You find maybe the kid has torn socks because the mum can’t afford their uniform and they get teased because of things like that. It’s not good for that kid, they need to feel equal”

RECOMMENDATIONS

MENTAL HEALTH

Recommendations:

- Department for Health ensure that every asylum seeker, and their family, receives a full social services assessment before they are allocated dispersal accommodation and that they receive follow up appointments. This assessment should identify specific needs which should be considered by Mears Group and the Home Office when allocating dispersal accommodation. This assessment should also determine whether the individual is mentally fit to be interviewed as part of their asylum claim, and should protect them from further trauma.
- GP practices remove charges for letters and medical reports for asylum seekers which can cost up to £50. These letters are used as evidence for the person's asylum claim and for support organisations to advocate on their behalf.
- Organisations providing counselling, mental health services and medical professionals seek to actively recruit members of the BME and refugee and asylum community as either staff or peer mentors. This approach has proven to be successful in Germany through a pilot project run by Medicines Sans Frontiers (MSF) [60]. The project trained refugees as psychosocial peer counsellors. Through one-to-one or group

sessions, newly arrived asylum seekers talked about their worries and mental state with people who had similar experiences. The peer counsellors were trained to identify the most troubling cases and to work with asylum seekers to develop coping techniques for stress and anxiety. The successes of the programme were two-fold; firstly it countered feelings of boredom and loneliness by employing refugees to deliver mental health services to their peers. Secondly, it was able to break down cultural and language barriers as well as the stigma associated with therapy within the asylum and refugee community. If a similar project to this was implemented in Belfast it would be greatly beneficial and empowering to the whole community of asylum seekers and refugees.

Open Call to Allies:

- Organisations providing counselling, mental health services, and medical professionals join Housing4All's coalition to develop practical initiatives aimed at addressing some of the root causes of mental ill health experienced by asylum seekers and their families. Housing4All also call on those named above to work with

Housing4All to deal with discrimination against asylum seekers and the stigma around mental health within the asylum seeking community.

*"We have
suffered
persecution
only to come
here and
suffer more
torture"*

RECOMMENDATIONS

RIGHT TO WORK

Recommendations:

- Following the lead of almost every other EU country, Home Office lift the ban on the right to work and allow asylum seekers to work after 6 months of making their claim for asylum. Home Office's own research shows there is no correlation between number of asylum claims and employment access. The blanket employment ban damages the mental health and wellbeing of people seeking asylum and should be ended.
- Belfast City Council, led by the Lord Mayor, seek a meeting with the Home Office to advocate for employment rights for asylum seekers.
- Belfast City Council and Department for Communities establish a sub-committee in the following 2019/2020 term to develop plans for 'Timebanking', which provides non-monetary ways for asylum seekers and non-asylum seekers to exchange goods and services.

Open Call to Allies:

- Trade Unions, third sector organisations and civil society, pledge your support to the Lift the Ban campaign.

*"It's a bad thing.
You don't feel
active in society.
It's very bad. It
affects me
morally and
physically"*

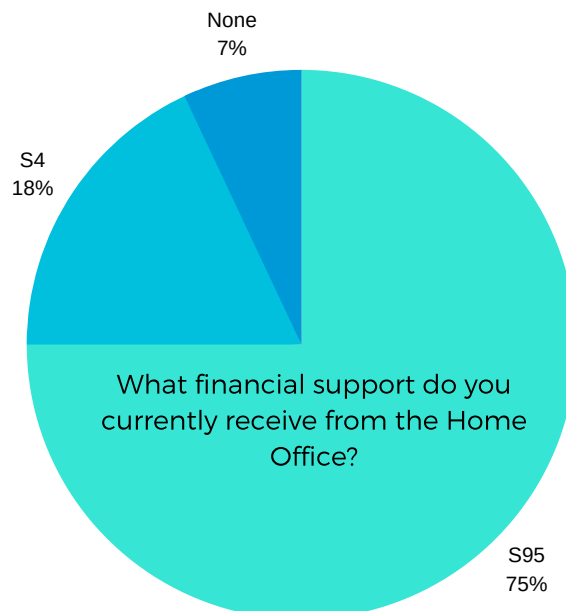
ANALYSIS OF SURVEY RESULTS

DESTITUTION

Indicator: Percentage of people who are destitute.

Baseline: 7% of people stated they were not in receipt of any Home Office support.

Benchmark: Reduced to 0% by June 2020.



The enforced destitution of the asylum seeking community has been a key issue for Housing4All since the group was established in 2016. It was the focus of the first report we published, 'Human Rights for Some: A monitor of homelessness among destitute asylum seekers – A proposal for action'. We have been monitoring this issue since 2016 and the situation has not improved.

As the Home Office does not keep statistics on the number of asylum seekers who are destitute, it is impossible to know how many are affected by this issue. 7% of our survey respondents were not in receipt of any Home Office support. In 2015, the Refugee and Asylum Forum completed research which estimated there were

around 100 destitute asylum seekers in Belfast at any one time[4]. However, Housing4All estimate that the true number is much higher as people who have been destitute for several years fall away from established networks of support and go 'underground', where they are at serious risk of exploitation and abuse.

Enforced destitution has been a feature of the asylum system since the early 1990's when the entire system was overhauled. Section 115 of the Immigration and Asylum Act 1994 bars people subject to immigration restrictions from accessing public funds, meaning they are not entitled to access emergency accommodation or support through homeless hostels. Asylum

[4] <https://www.lawcentreni.org/Publications/Policy-Briefings/Preventing-asylum-seeker-destitution-RAF-Jan-17.pdf>

seekers can be made homeless several times throughout their application process. Sometimes this is for a number of weeks or months, and sometimes for years. At these times there is no support open to them, and thus they have to sleep rough, stay in overcrowded conditions, enter into potentially exploitative relationships in exchange for shelter or, rely on charitable assistance. Enforced destitution serves to disincentivise people from remaining in the UK, deter people from travelling to the UK, and ensure the Home Office appears 'tough on immigration'. This policy results in the exacerbation of the physical, emotional, and mental trauma already suffered by many. It is also a barrier to people re-entering the asylum process either through appeal or a fresh claim, as they do not have the stability of safe and secure accommodation.

When someone makes a claim for asylum, this automatically triggers their application for 'Section 95' support, provided by the Home Office, which entitles them to basic accommodation on a 'no-choice' basis and £37.75 per week allowance. If an asylum seeker is granted refugee status they are given 28 days to vacate their accommodation and must present as homeless. New refugees are supported by Extern to access state homeless provision and other social security benefits to which they are now entitled. If an asylum seeker has their application refused, they are evicted from accommodation after 21 days and made street homeless. Some individuals can apply for 'Section 4' support if they meet the narrowly

prescribed criteria. This support entitles them to basic accommodation and £35 per week non-cash allowance. S4 applications are supposed to take 2-5 days to process but currently they are taking over a month in many cases.

Since 2016, Housing4All have lobbied government to reject this Home Office policy of enforced destitution using their devolved powers in relation to housing. In 2017, Housing4All developed a project to accommodate 10 destitute female asylum seekers in unoccupied social housing zoned for redevelopment, meaning it could not be used to accommodate people on the social housing waiting list. The Northern Ireland Housing Executive were positively engaged throughout the development stage of this project but at the final stage refused to allow the project to go ahead.

Housing4All have lobbied both NIHE and the Department for Communities to give the go ahead to this project but it remains blocked. Despite all of these barriers Housing4All remained determined. In 2018, in the face of complete state failure to support destitute asylum seekers, Housing4All launched a pilot project to accommodate 4 destitute female asylum seekers in partnership with Choice Housing Association, Community Foundation for Northern Ireland, East Belfast Mission, and PPR. This project also received funding from Embrace NI to furnish the accommodation and support from many other organisations across the sector.

International Human Rights Law

General Comment No. 20, Non-discrimination in economic, social and cultural rights which expands on (art. 2, para. 2, of the International Covenant on Economic, Social and Cultural Rights) states that the ground of nationality should not bar access to Covenant rights, e.g. all children within a State, including those with an undocumented status, have a right to receive education and access to adequate food and affordable health care. The Covenant rights apply to everyone, including non-nationals, such as refugees, asylum-seekers, stateless persons, migrant workers and victims of international trafficking, regardless of legal status and documentation[5].

Local Policy

Section 115 of the Immigration and Asylum Act 1999 states that a person will have 'no recourse to public funds' if they are 'subject to immigration control'.

The Northern Ireland Supporting People Guidance 2012[6] (which most homeless hostel accommodation beds are funded by, largely in hostels run by charities) classifies irregular migrants, which includes asylum seekers, as "ineligible service users". This means that even where a hostel or shelter wants to provide support, they cannot. Homelessness providers are compensated for providing emergency accommodation through housing

Benefit, and asylum seekers are not entitled to access housing benefit or other forms of social security.

Social services have a duty to prevent human rights violations (including through provision of housing) for someone who is at risk of homelessness and is vulnerable due to factors including age, disability, mental/physical health issues, etc. The Health and Personal Social Services (NI) Order (1972) imposes a number of duties and creates powers including:

(1) In the exercise of its functions under Article 4(b) the Ministry shall make available advice, guidance and assistance, to such extent as it considers necessary, and for that purpose shall make such arrangements and provide or secure the provision of such facilities (including the provision or arranging for the provision of residential or other accommodation, home help and laundry facilities) as it considers suitable and adequate. [...]

(2) Assistance under paragraph (1) may be given to, or in respect of, a person in need requiring assistance in kind or, in exceptional circumstances constituting an emergency, in cash; so however that before giving assistance to, or in respect of, a person in cash the Ministry shall have regard to his eligibility for receiving assistance from any other statutory body, and, if he is so eligible, to the availability to him of that assistance in his time of need."

[5] <https://www.refworld.org/docid/4a60961f2.html>

[6] http://www.nihe.gov.uk/supporting_people_guidelines_2012.pdf

While there exist certain prohibitions against social services providing support to individuals within the immigration system[7], in 2005 the UK House of Lords ruled that a failure by the state to provide social support which exposes some asylum seekers to a real risk of becoming destitute will in certain circumstances constitute 'inhuman and degrading treatment', and therefore will be contrary to Article 3 of the European Convention on Human Rights.

In practice, however, most people seeking asylum find this support impossible to access. Even foregoing the narrow access criteria, the Northern Ireland Human Rights Commission has stated that the current approach is not sufficient:

"It should be emphasised that this bare minimum approach is less than satisfactory, coming from a developed state such as the UK. Nevertheless, it is the Commission's view that, to ensure a minimum level of support, a non-UK national who is destitute and has no other means of support ought to be assessed for assistance under the 1972 Order."

The current NIHE document 'Facing the Future: Homelessness strategy for Northern Ireland 2012-2017' makes no mention of the situation of destitute asylum seekers. Whilst many publicly elected representatives offer support to destitute asylum seekers through constituency work, the destitution experienced by these people seeking

asylum is apparently not deemed to be worthy of a public policy response.

Recommendations:

- Department for Communities and Northern Ireland Housing Executive cease their compliance with the disgraceful and inhuman enforced destitution policies of the UK Home Office which deliberately prevent people from accessing many of the most basic human rights to which they are entitled. Using devolved legislative, administrative and policy development powers, both authorities should collaborate to develop alternatives to uphold the rights of asylum seekers beginning with the removal of barriers for people accessing emergency accommodation.
- Department for Communities and the Northern Ireland Housing Executive scrap their indefensible policy of refusing to grant permission to Housing Associations to use properties unavailable for the social housing waiting list to provide accommodation to destitute asylum seekers.

Open Call to Allies:

- Housing Associations with charitable objectives, solicitors, advocates, and other supporters join Housing4All's "End Destitution" coalition to develop practical initiatives and lobby for change at various levels of the state and public administration.

[7] Section 119 of the Immigration and Asylum Act prohibits the provision of support if the 'person in need' has developed a need as a result of being destitute. In other words, there must be a pre-existing need.

ANALYSIS OF SURVEY RESULTS

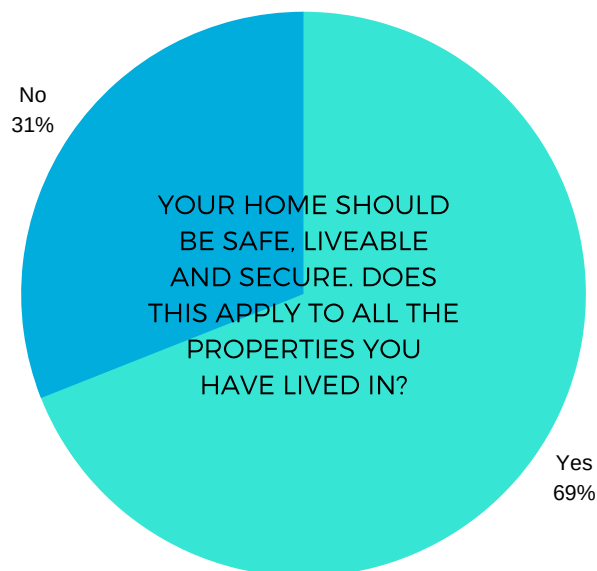
HOUSING CONDITIONS

Indicator: Percentage of people living in poor housing.

Baseline: 31% of people stated their home was not safe, liveable or secure. Their privacy was not respected and/or they did not have access to essential facilities such as heating or electricity.

Benchmark: Reduced to 0% by June 2020.

91% of people surveyed by Housing4All said they were living in accommodation provided by the Home Office through the National Asylum Support Service (NASS). NASS is a UK wide scheme of providing accommodation under the COMPASS contract delivered by four corporations across 6 regions of the UK. The delivery of this contract has been plagued by scandal and has faced widespread criticism to the extent where the UK Home Affairs Select Committee launched an inquiry into “the quality of the accommodation being used by Providers and reports of poor treatment of the asylum seekers that they house[8]”. To date, the Home Office has not implemented any of the recommendations of this inquiry.



From 2012-2019, accommodation for people seeking asylum in Belfast was provided by Serco and the Northern Ireland Housing Executive, who were privately contracted by the Home Office.

From 2019-2029, accommodation for people seeking asylum in Belfast will be provided by Mears Group PLC under the AASC contract worth £50million.



Making People *Smile*

31% of survey respondents to the Housing4All survey said their home was

[8] <https://publications.parliament.uk/pa/cm201617/cmselect/cmhaff/637/63703.html>

not safe, liveable or secure, their privacy was not protected, or they didn't have access to essential services and facilities including energy and heating.

The main reasons people gave for this included unresolved maintenance issues (26.7%), privacy not respected (16.7%), dampness (10%), location not close to services (3.3%) and other (43.3%). Comments given in response to 'other' included "sometimes heat not working, sometimes no gas or electricity" and "sometimes very cold and smelling".

The Independent Chief Inspector of Border and Immigration's (ICIBI) report into accommodation conditions[9] found that just 24% of properties across the UK were fit for purpose under the requirements of the COMPASS contract. Housing4All, through Freedom of Information request, were able to determine that 63% of properties in Belfast did not meet contractual standards and half of these properties required 'urgent' or 'emergency' repairs. These figures obtained from the Home Office contrast sharply with the results of our own survey. It is our view that this is evidence of a failure of accommodation providers to address complaints, a sustained culture of intimidation from accommodation providers meaning asylum seekers feel unable to report complaints, and asylum seekers being unaware of their rights and contractual

standards in relation to housing.

The effects of poor housing conditions on both physical and mental health are well documented. Inadequately heated homes can cause high blood pressure and heart attacks as well as illnesses like pneumonia[10]. Damp and mould have been linked to a range of respiratory illnesses, nausea, vomiting and general ill-health; children and the elderly are at particular risk. People seeking asylum suffer with greater levels of mental ill-health than the general population, and poor housing conditions and insecurity of tenure are proven to be a key factor in causing further stress, anxiety, panic attacks and depression[11].

Insecurity and 'not knowing' are chronic features of the asylum system and great sources of anxiety. The COMPASS contract permits asylum seekers to be relocated twice within a 12-month period with just 7 days notice. This is an issue which particularly impacts children and families which will be discussed in the 'Children's Issues' section of this report.

International Human Rights Law

The right to housing is enshrined in international human rights law. Article 11 of the International Covenant on Economic, Social, and Cultural Rights recognises "the right of everyone to an adequate standard of living for himself ,

[9] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757285/ICIBI_An_inspec tion_of_the_HO_management_of_asylum_accommodation.pdf

[10] <https://www.cse.org.uk/advice/advice-and-support/heat-and-health>

[11] https://england.shelter.org.uk/_data/assets/pdf_file/0005/1364063/Housing_and_mental_health_-_detailed_report.pdf

and his family, including adequate food clothing, and housing, and to the continuous improvement of living conditions[12]”.

General Comment 4 of the ICESRC states that the right to housing includes security of tenure, availability of services, materials, facilities and infrastructure, affordability, habitability, accessibility, location, and cultural adequacy[13]. In addition, the World Health Organisation's Health Principles of Housing state that homes should be free from vermin, damp, and mould, and should be properly heated and equipped[14].

Local Policy

The Asylum Accommodation and Support Contract (AASC)[15] which replaces the COMPASS contract outlines standards to ensure accommodation is safe, habitable, and fit for purpose. It is clear that in the delivery of the previous contract, accommodation providers have fallen far short of their contractual obligations. Housing rights for asylum seekers have been progressively eroded since the early 1990s: “the 1993 Asylum and Immigration Appeals Act, the 1996 Asylum and Immigration Act, and the 1996 Housing Act removed many of the legal and welfare entitlements which asylum seekers had previously enjoyed,

especially with regard to welfare and public housing and housing benefits”. [16]

One key change was the removal of security of tenure, which is fundamental to the right to adequate housing. Subsection 4, paragraph A of the Protection from Eviction Act 1977 [17] removes asylum seekers' protection from eviction and security of tenure. Asylum seekers can be required to leave accommodation without a court order having been obtained. Under the NASS contract, asylum seekers can be relocated with just 7 days' notice and can legally be moved twice in a 12 month period. Any relocation prevents proper integration and is disruptive to the health and wellbeing of asylum seekers, particularly where they are moved away from support networks.

The Decent Homes Standard, applicable for Northern Ireland, which falls under the responsibility of the Department for Communities, is set out in Schedule 5 of the Housing Order (NI) 1992[18]. It determines that a dwelling is fit for human habitation if it is in a reasonable state of repair, has reasonably modern facilities and services, and provides a reasonable degree of thermal comfort. Dwellings must also be structurally stable, free from dampness, and have adequate ventilation. The responsibility to

[12] <https://www.ohchr.org/EN/Issues/Housing/Pages/InternationalStandards.aspx>

[13] <https://www.ohchr.org/EN/Issues/Housing/toolkit/Pages/RighttoAdequateHousingToolkit.aspx>

[14] https://apps.who.int/iris/bitstream/handle/10665/39847/9241561270_eng.pdf?sequence=1&isAllowed=y

[15] <https://www.gov.uk/government/news/new-asylum-accommodation-contracts-awarded>

[16] <https://www.birmingham.ac.uk/Documents/college-social-sciences/social-policy/iris/2014/working-paper-series/IRiS-WP-1-2014.pdf>

[17] <https://www.legislation.gov.uk/ukpga/1977/43>

[18] <http://www.legislation.gov.uk/nisi/1992/1725/contents/made>

maintain the Decent Homes Standard is specific to the dwelling and is not dependent on the status of the tenant.

The NI Executive Draft Programme for Government 2016-2022 outlines key issues in society and the departments responsible for addressing them. The Department for Communities is responsible for improving the supply of suitable housing per indicator 8 of the Draft Programme for Government.

The Northern Ireland Housing Executive formally recognises that “poor housing can also have a negative impact on a wider range of physical and mental health problems” in their Housing and Health Strategy. Objective 1 of this strategy outlines the Northern Ireland Housing Executive’s commitment to “reaching the Decent Homes Standard” and “improve housing conditions in the private sector”[19].

In April 2019, Belfast City Council took over responsibility for licencing Houses of Multiple Occupation (HMOs) from the Northern Ireland Housing Executive. To be granted an HMO licence, properties must meet the standards outlined in the Houses in Multiple Occupation Act (Northern Ireland) 2016 [20]. Section 13 sets out the specific requirements.

Recommendations:

- Mears Group adopt a zero tolerance approach to bullying and intimidation of asylum seekers

by staff including robust procedures respecting the right to privacy for asylum seekers and investigating reports of abuse.

- Mears Group maintain regular inspection and reporting of properties to ensure they meet contractual requirements and human rights standards. These records are made available to local authorities, devolved departments and to the public under Freedom of Information request in the interests of transparency and public accountability.
- Mears Group work with local health authorities to provide assessments ensuring that allocated housing is suitable for people’s physical and mental health needs (see Mental Health Recommendations below). All residents to be provided with a pre-allocation induction, with interpreters, outlining their rights, including how to engage with the complaints process, and provide information on local services.

Open Call to Allies:

- Third sector organisations work in partnership with Housing4All to support asylum seekers asserting their housing rights through monitoring, exposing substandard conditions, and ensuring problems are resolved

[19] https://m.nihe.gov.uk/housing_and_health.pdf

[20] www.legislation.gov.uk/nia/2016/22/contents

ANALYSIS OF SURVEY RESULTS

FOOD POVERTY

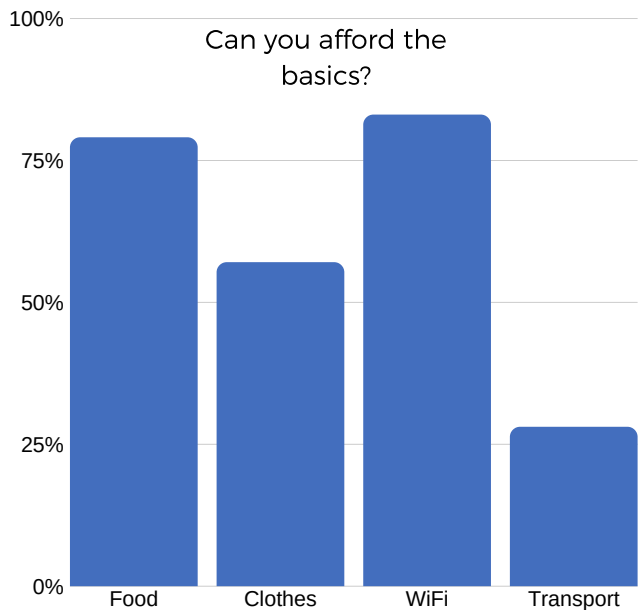
Indicator: Percentage of people living in food poverty.

Baseline: 79% of people stated they could not afford food for themselves or their family.

Benchmark: Reduced to 20% by June 2020.

Food Poverty is not simply the inability to afford food; it is the inability to secure access to adequate and nutritious food. People seeking asylum are disproportionately impacted by food poverty. The results of our survey showed that;

- 79% of asylum seekers in Belfast cannot afford the cost of food.
- 57% of asylum seekers are currently attending a food bank.
- Of those who are using a food bank, 70% attend at least once a month and almost 20% are attending on a weekly basis.
- These statistics contrast sharply with figures that suggest 7% of the wider population of the UK have used a food bank[21].



There are proven linkages between food poverty and health conditions such as diabetes, cardio-vascular disease, cancer, obesity, and malnutrition[22]. Food poverty is also linked to a range of mental illnesses such as depression, anxiety and psychosis[23]. Food poverty related mental ill-health is caused by both vitamin deficiencies and social factors such as stigma, exclusion, and loss of dignity. It is proven that hungry children behave and perform worse in school[24], further having negative impact on them and their families.

The Home Office provide each asylum seeker with £37.75 per week to cover the cost of food, clothing, toiletries,

[21] <https://www.independent.co.uk/news/uk/home-news/food-banks-uk-how-many-people-adults-poverty-a8386811.html>

[22] https://www.sustainweb.org/foodaccess/what_are_the_consequences_of_food_poverty/

[23] <https://www.mentalhealth.org.uk/sites/default/files/food-for-thought-mental-health-nutrition-briefing-march-2017.pdf>

[24] IBID

medication, transport, and other essentials.

The Home Office expect that people seeking asylum will spend £20 of this weekly allowance on food. However, research completed for the All-Island Food Poverty Network states that the cost of a healthy food basket for a family of two adults and two children is £119 per week[25]. The weekly income of an asylum seeking family of this size is £151[26]. A low income household in Northern Ireland would have to spend 30% of their weekly income in order to purchase a basket of healthy food. An asylum seeking family would have to spend 79% of their weekly income to purchase the same basket of food. In addition, culturally appropriate foods such as Halal meat or vegetables/grains imported from people's home countries are more expensive.

Being unable to afford food is dehumanising and is a direct result of deliberate Home Office policy. Food is an important part of identity and culture and helps people seeking asylum remain attached to the place they are from. It is also important that children of asylum seekers are able to share in their parent's culture. As one member of Housing4All said, "if you force people not to eat food according to their culture, you are pushing their kids to forget their own culture which is not right. They need to be supported to keep their culture and share it with their children and their children's

children. You push me to eat this, they will never know our food. It's finished. Gone. They will know nothing about our culture". The combination of food insecurity and loss of culture worsens the trauma of displacement.

As the results of our survey have shown, many asylum seekers rely on food banks and other charitable organisations. Housing4All recognise these organisations are run and supported by kind and generous individuals without whom the situation would be far worse. However, constant reliance on charities inevitably has an impact on people's dignity and wellbeing.

Housing4All have found that often charities struggle to meet the needs of everyone. People who participated in our research explained how they were often turned away from receiving food parcels as they had already received their quota and some people with children even reported to us that they were told by staff if they came to collect another food parcel they would be reported to social services. Food banks also struggle to provide food that meets the health or cultural needs of individuals.

International Human Rights Law

The right to adequate food is a right recognised under international law in multiple statutes. Article 11 of the International Covenant on Economic

[25] [https://www.safefood.eu/Professional/Nutrition/Nutrition-News-en/Nutrition-News/June-2015/Cost-of-a-Healthy-Food-Basket-\(Northern-Ireland\).aspx](https://www.safefood.eu/Professional/Nutrition/Nutrition-News-en/Nutrition-News/June-2015/Cost-of-a-Healthy-Food-Basket-(Northern-Ireland).aspx)

[26] Weekly asylum support rate = £37.75 per person x4 = £151

[27] <https://www.ohchr.org/en/professionalinterest/pages/cescr.aspx>

Social and Cultural Rights (CESCR) affirms “the right of everyone to an adequate standard of living for himself and his family, including adequate food[27].”

Article 11 of the Covenant goes on to outline “the fundamental right of everyone to be free from hunger[28]”. In addition, the Committee on Economic, Social, and Cultural Rights affirms that “the right to food is indivisibly linked to the inherent dignity of the human person and is indispensable for the fulfilment of other human rights[29]”.

Article 27 of the United Nations Convention on the Rights of the Child recognises “the right of every child to a standard of living adequate for the child's physical, mental, spiritual, moral and social development[30]” and places obligations on states to assist in the provision of nutritious food to ensure the full realisation of this right.

The United Nations Special Rapporteur on the Right to Food states that “the right to food is the right to have regular, permanent and unrestricted access, either directly or by means of financial purchases, to quantitatively and qualitatively adequate and sufficient food corresponding to the cultural traditions of the people to which the consumer belongs, and which ensure a

physical and mental, individual and collective, fulfilling and dignified life” [31].

Finally, the Committee on the Elimination of Racial Discrimination in its General Comment 30 paragraph 37 recommends that States should “take measures to enable non-citizens to preserve and develop their culture” [32]

Local Policy

According to The UK Stakeholders for Sustainable Development, there is no single nationwide Government measure for hunger in the UK despite staggering levels of people living in food poverty[33].

Here, the Draft Programme for Government 2016-2021[34] indicator 19 defines the role of the Executive as “tackling poverty and deprivation” and commits the Department for Communities to reducing both absolute and relative poverty.

The Food Standards Agency has assumed co-responsibility for developing a short, medium, and long term strategy to address food poverty here and increase the number households able to secure an adequate and nutritious diet[35]. This strategy has

28] IBID

[29] <http://www.cwp-csp.ca/poverty/a-human-rights-violation/the-right-to-food/>

[30] <https://www.cypcs.org.uk/rights/uncrcarticles/article-27>

[31] <https://www.ohchr.org/EN/Issues/Food/Pages/FoodIndex.aspx>

[32] https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/TBSearch.aspx?Lang=en&TreatyID=6&DocTypeID=11

[33] <https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/1491/149105.html>

[34] <https://www.northernireland.gov.uk/consultations/draft-programme-government-framework-2016-21-and-questionnaire>

[35] <https://www.food.gov.uk/sites/default/files/media/document/FS307008%20-%20Food%20Poverty%20Final%20Report.pdf>

been developed as part of the FSA's role as co-chair of the All-Island Food Poverty Network of which the Department for Communities and the Department for Health are members[36].

Belfast City Council are members of the Belfast Food Network Food Poverty working group, which recommends a rights based approach to food poverty and will address the structural causes of food poverty by promoting the living wage in Belfast. It also seeks to promote the availability of fresh healthy food through a range of social enterprises and community projects[37].

Recommendations:

- Home Office end their policy of enforced destitution and increase financial support provided to asylum seekers to be in line with social security benefits.
- Home Office amend their policy so that Section 4 support is available to be withdrawn as cash in the same way as Section 95 support, removing barriers to people accessing essential items.
- Belfast City Council and Department for Communities establish a sub-committee in the following 2019/2020 term to develop plans to introduce a digital money scheme (similar to the MONI scheme in Finland) to pay additional financial allowances to asylum seekers outside of Home Office support.

This scheme would give people more resources, more autonomy, freedom from Home Office covert surveillance, and a digitally verifiable identity akin to a bank account.

- Department for Communities provide funding for free school meals during school holidays, as this is a time when asylum seeking families struggle most to feed their children.
- Belfast City Council establish a sub-committee in the following 2019/2020 term to develop plans to promote an Aspen Card discount scheme among local businesses.

Open call to Allies:

- Third Sector organisations work in partnership with Housing4All to develop culturally appropriate and healthy donation lists for food banks to circulate to their donors.
- Food banks work to promote a culture of dignity and respect, allowing people to 'shop' for food rather than be given pre-packed parcels. Food banks could operate a system similar to the Khora Free Shop in Athens, which gives people vouchers that allocate them a certain number of items by category, which they can spend in the store.
- Local businesses implement a discount scheme for holders of an 'Aspen card', the card used to pay Home Office support. It could operate similarly to the 'student discount' scheme which already successfully exists across Europe.

[36] <https://www.safefood.eu/Professional/Nutrition/Food-Poverty/All-island-Food-Poverty-Network.aspx>

[37] <https://minutes3.belfastcity.gov.uk/documents/s54057/Appendix%201%20-%20BFN%20Draft%20Collaborative%20Response.pdf>

ANALYSIS OF SURVEY RESULTS

CHILDREN'S ISSUES

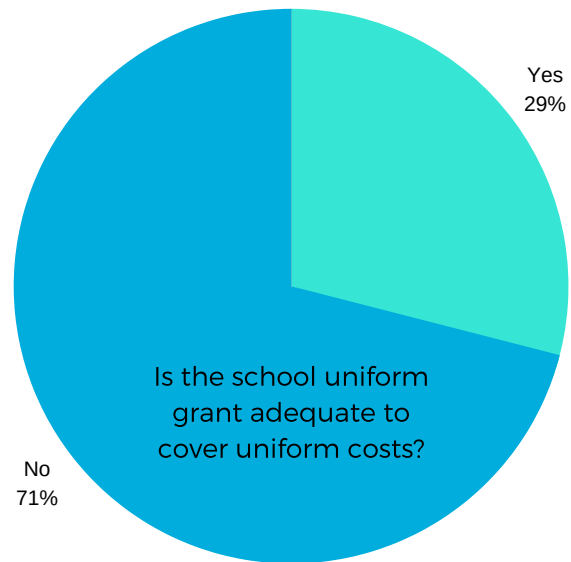
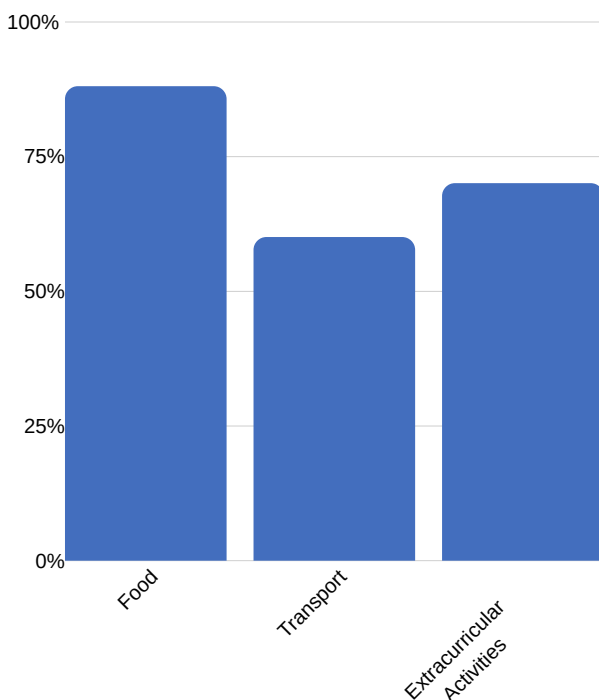
Indicator: Percentage of parents who cannot afford child related costs.

Baseline 1: 71% of people stated school uniform grant is not adequate.

Benchmark 1: Reduced to 30% by June 2020.

Baseline 2: 88% of people stated they could not afford the basics and other child related costs.

Benchmark 2: Reduced to 40% by June 2020.



Families make up 38% of the asylum seeking population surveyed. Parents we surveyed greatly struggled to afford the costs associated with raising a family. 71% of parents stated the school uniform grant was not adequate. Over one third of parents said they had been forced to change their child's school due to relocation by the Home Office. The school uniform grant is only available once a year and so families who are relocated during the school year must pay for the new uniform out of their weekly allowance. 88% of parents stated they could not afford basic items such as food and clothing along with other child related costs, specifically transport, recreational activities, and school trips.

The Home Office provides a one off maternity payment of £300 for children born to asylum seekers [38]. 21% of our survey respondents said they had had a child since becoming an asylum seeker and 92% of them struggled to afford the cost of this.

75% of parents reported they experienced anxiety, isolation, and depression or felt they could not cope with daily activities. Research has found that parents mental ill health has a negative impact on the child/children within the family[39].

Research has shown that schools are central in assisting newly arrived children and families to settle in their new community, this is only true however in circumstances where children and their families feel they belong[39]. Constant fear of relocation by the Home Office prevents families from settling properly. Schools can provide safe and stable setting where refugee children can develop meaningful and constructive connections to peers, teachers and other professionals, as well as being a place in which discrimination, racism and stigmatisation can be actively countered[40]. For this to be successful, teachers and other staff must undergo training on how to work specifically with asylum seeking children and their families along with knowledge of local support and clinical services available to

this particular group.

Housing4All found through speaking to parents that they struggled with being unable to afford things like extracurricular activities, sports, and learning musical instrument and this had a negative impact on the mental health of parents. Parents felt that their children did not respect them as they are unable to afford things like school uniforms or bus fare. Parents feel that being able to participate equally in school and out of school activities is vital to their child's education, development, and integration into their new community.

International Human Rights Law

Under international law, children's rights are enshrined in the United Nations Convention on the Rights of the Child. This convention outlines the rights of children, and instructs states to "respect and ensure the rights set forth in the present Convention to each child within their jurisdiction without discrimination of any kind, irrespective of the child's or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status"[41]. The convention also outlines the rights of children to adequate nutrition, housing, medical services, education, and recreational activities.

[38] <https://www.gov.uk/asylum-support/what-youll-get>

[39] <https://www.belfasttelegraph.co.uk/news/health/30-of-northern-ireland-children-have-mum-with-mental-illness-highest-rate-in-uk-38202563.html>

[39] <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0089359>

[40] <https://www.city.ac.uk/news/2018/january/schools-key-to-successful-integration-of-child-refugees,-says-study>

[41] <https://www.humanium.org/en/convention/text/>

[42] <https://www.legislation.gov.uk/ukpga/2009/11/section/55>

Local Policy

Under Section 55 of the Borders, Citizenship and Immigration Act 2009[42], the Home Office has a duty to safeguard and promote the welfare of children who are in the UK. The Children's Services Co-operation Act (NI) 2015[43] provides a statutory framework to protect the rights of children and young people to enjoy a decent standard of physical and mental health, to the enjoyment of play and leisure, to learning and achievement, and for them to live in a society which respects their rights.

Per the Draft Programme for Government 2016-2021[44], the Department of Education has responsibility for both indicator 11, improve educational outcomes, and Indicator 15, improve child development.

The School uniform grant, administered by the Education Authority, pays a maximum of £35.75 for a post primary pupil, £51 for a post-primary/special school pupil under 15 years old, £56 for a post-primary/special school pupil over 15 years old, and £22 for a post-primary/special school pupil physical education kit. There are no grants available for nursery/reception age children, and parents are only eligible to receive one uniform grant per year[45].

Belfast City Council have committed to supporting all of Belfast's children and young people to be empowered, safe, happy, achieving at each stage of life, and playing their part in their city and communities[46] as part of the Children and Young People's Strategic Partnership.

In order to ensure that these needs are met, the Northern Ireland Commission for Children and Young People has Statutory Duties to; promote awareness of children's rights, monitor and review the effectiveness of law and practice, and children's services, advise and communicate with government and relevant authorities, seek the views of children and young people, undertake legal challenges, address human rights breaches, and advocate on behalf of children and young people.[47]

Recommendations:

- Currently the school uniform allowance pays a maximum of £36 for primary school pupils and a maximum of £56 for secondary school pupils, plus a maximum of £22 for a physical education kit available to secondary school pupils only. Department for Communities increase the school uniform allowance to at least £100 per annum and provide another allowance if the child moves schools.

[43] <https://www.legislation.gov.uk/nia/2015/10/contents>

[44] <https://www.northernireland.gov.uk/consultations/draft-programme-government-framework-2016-21-and-questionnaire>

[45] <https://www.nidirect.gov.uk/articles/school-uniform-and-uniform-grants>

[46] <https://www.belfastcity.gov.uk/community/childrenyoungpeople.aspx>

[47] <https://www.niccy.org/media/3051/socrni-main-report-final-june-18.pdf>

Department for Health provide appropriate mental health assessments and support for children in families who are seeking asylum.

Belfast City Council confidentially provide free places for children to attend extra-curricular activities and summer clubs so that children in families seeking asylum can participate in activities with their peers without discrimination.

- Department for Education provide free bus passes for all children from asylum seeking families travelling to school by removing the qualifying distance requirement – currently standing at four miles (round trip) for primary school pupils and six miles (round trip) for secondary school pupils.
- Mears Group adopt a policy whereby school age children are not relocated away from their place of study without exhausting normal statutory processes which apply to all children. Such processes are aimed at minimising disruption and protecting the health and well-being of the child concerned. Failure to enforce these protections is an officially acknowledged act of harm to the child.

Open Call to Allies:

- Parents, teachers, charities, and other support and advocacy organisations pledge your support to the recommendations in this report and join Housing4All in calling for the rights of children seeking asylum to be protected.

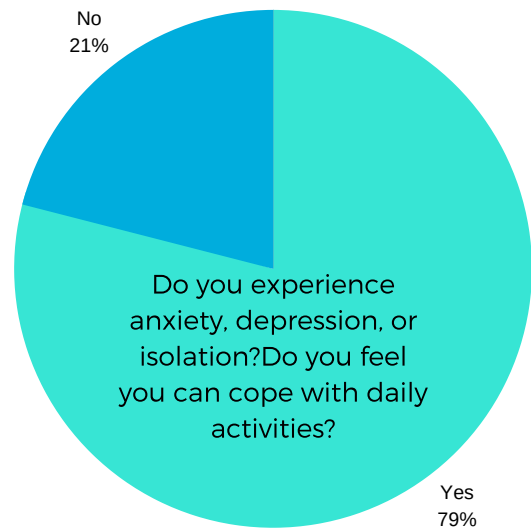
ANALYSIS OF SURVEY RESULTS

MENTAL HEALTH

Indicator: Percentage of people suffering with mental ill-health.

Baseline: 79% of people stated they experienced anxiety, depression, or isolation or felt they could not cope with daily activities.

Benchmark: Reduced to 50% by June 2020.



Research has shown that forcibly displaced people are at significantly increased risk of suffering mental illnesses such as depression, anxiety, and post-traumatic stress disorder. 78% of asylum seekers surveyed by Housing4All stated that they suffer with anxiety, isolation, and depression or feel that they cannot cope with daily activities. Comparably, 20% of the overall population in the North of Ireland suffer with mental ill-health[48].

There is clearly a mental health crisis here; more people have taken their own life in the 20 years since the signing of the Good Friday Agreement than were killed during the 30 year conflict[49]. First generation traumas and

transgenerational traumas have not been addressed and are further compounded by a continued denial of rights to housing, health, social security, and a range of equality issues. Mental health is the single largest cause of ill-health and disability here yet only accounts for around 5% of the overall health budget[50].

There are generally three stages of a displaced person's journey where they may experience trauma causing mental ill-health: pre-displacement, during their flight, and post-displacement. Post-displacement stressors can be caused by a variety of factors relating to the displacement itself including family separation, social isolation,

[48] <http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2016-2021/2017/health/0817.pdf>

[49] <https://www.amh.org.uk/wp-content/uploads/2018/02/Briefing-Mental-Health-Crisis-in-Northern-Ireland.pdf>

[50] <https://www.pprproject.org/stop-pretending-things-are-ok-we-need-more-funding-for-mental-health-now>

racism and discrimination, as well as loss of social identity tied with former community and cultural groups[51].

Post-displacement stressors can also be caused by poverty, poor quality housing, barriers to employment and education, alongside complex and unfair legal systems. It is undeniable that the additional trauma suffered by people seeking asylum is deliberately inflicted upon them as a result of Hostile Environment policies designed to punish people who the British Government deem to be undesirable migrants. It is often these post-displacement experiences which asylum seekers and refugees find most difficult. A staggering 77% of people surveyed by Housing4All said their health had gotten worse since claiming asylum in the UK.

Not only are asylum seekers more vulnerable to mental health problems, they are also less likely to receive support than the general population for a number of reasons[52]. Often, people seeking asylum struggle to afford transport costs to attend medical appointments. They fear information about them will be shared with the Home Office which will negatively affect their case. Many asylum seekers face discrimination from medical professionals who also lack knowledge of their unique issues and experiences

associated with forced displacement. In addition, mental ill-health can be stigmatised within the asylum and refugee community, which prevents people from reaching out for support. Language barriers also prevent asylum seekers from receiving support.

Building strong relationships within local communities is one powerful way of addressing the mental ill-health of asylum seekers and refugees[53], as it challenges the deliberately isolating hostile environment policies. This should be an explicit focus of those providing mental health services.

Not enough attention is paid to the mental health of asylum seekers when they arrive in the North of Ireland, which has significant and lasting impacts. The health screening asylum seekers receive upon arrival tests for communicable diseases only (TB, HIV, Hepatitis), and the Home Office “discharges its duties on health matters by ensuring that relevant asylum seekers have all the necessary information, in a language they understand, to access and register with their local health services”. A full and proper assessment of the needs of asylum seekers is not carried out, despite contractual requirements which state accommodation must be suitable for the needs of the individual. There is significant research to suggest

[51] <https://link.springer.com/article/10.1007/s11920-016-0723-0>

[52] <https://www.equalityhumanrights.com/sites/default/files/research-report-121-people-seeking-asylum-access-to-healthcare-evidence-review.pdf>

[53] <https://migrationandmentalhealth.wordpress.com/2018/09/14/developing-a-culturally-sensitive-mental-health-intervention-for-asylum-seekers-in-the-netherlands-a-pilot-study/>

that mental ill-health is both exacerbated by and inhibits the success of, the asylum interview process. Research has shown that the process is extremely stressful for traumatised individuals and can be triggering for those suffering with PTSD. Research has also shown that trauma prevents individuals from remembering past experiences and giving a coherent account of these to officials. Traumatic memories often contribute to incomplete biographical accounts as people have difficulty retrieving memories of specific events [54]. The Home Office uses discrepancies in people's statements, comparing details given in the initial and substantive interviews to, often incorrectly, conclude the person is lying which ultimately leads to their claim being refused. It is vital that a full assessment of a person's fitness to be interviewed, and health needs are addressed, before any statements are given to the Home Office.

Asylum seekers involved in this research frequently reported to Housing4All that they felt medical professionals or other staff lacked understanding about their culture which prevented them from receiving adequate services. We recommend that organisations providing counselling and other mental health services undergo cultural diversity training and training on the asylum system.

International Human Rights Law

The right to physical and mental health is enshrined in international human rights law, Article 12 of the International Covenant on Economic Social and Cultural Rights recognises "the right of everyone to the enjoyment of the highest attainable standard of physical and mental health".

Under international law, states also have an obligation to "respect, protect and fulfil the right to mental health of all people on their territory or under their effective control, regardless of their migrant, refugee, or other legal status"[55].

The Committee on the Elimination of Racial Discrimination in its General Comment 30, affirms that states should "remove obstacles that prevent the enjoyment of economic, cultural and social rights by non-citizens, notably in the areas of education, housing, employment and health". Barriers to the promotion and protection of the right to mental health in the context of migration include the vast landscape of unequal power relations, "exclusion and toxic community relations are a central barrier to the realisation of the right to mental health in the context of migration. Likewise, exclusion leads to significant economic costs to communities."[56]

[54] <https://www.bmj.com/content/324/7333/324>

[55] <https://undocs.org/pdf?symbol=en/A/73/216>

[56] IBID

Local Policy

It is clear that the UK Home Office under successive Labour, Conservative & Liberal Democrat, and Conservative administrations have created a system which deliberately causes trauma and harm to asylum seekers.

The Provision of Health Services to Persons Not Ordinarily Resident Regulations (Northern Ireland) 2015 provides for primary and secondary health care to all asylum seekers, including those whose claims have been refused[57].

The Department of Health Protect Life 2 Suicide Prevention Strategy identifies migrant populations and ethnic minorities as being a priority group for suicide prevention efforts[58]. However, the specific needs of asylum seekers are not referenced in the Protect Life 2 Suicide Prevention Strategy or the Department for Health's Wellbeing 2026 Strategy.

The Health and Social Care Board state that they are committed to addressing any barriers to health. The HSBC recognise that members of Black and Minority Ethnic (BME) have difficulties accessing health services, particularly mental health services, and that asylum seekers face additional barriers[59].

Recommendations:

- Department for Health ensure that every asylum seeker and their family receives a full social services assessment before they are allocated dispersal accommodation and that they receive follow up appointments. This assessment should identify specific needs which should be considered by Mears Group and the Home Office when allocating dispersal accommodation. This assessment should also determine whether the individual is mentally fit to be interviewed as part of their asylum claim, and should protect them from further trauma.
- Organisations providing counselling, mental health services and medical professionals seek to actively recruit members of the BME and refugee and asylum community as either staff or peer mentors. This approach has proven to be successful in Germany through a pilot project run by Medicines Sans Frontiers (MSF) [60]. The project trained refugees as psychosocial peer counsellors. Through one-to-one or group sessions newly arrived asylum seekers talked about their worries and mental state with people who had similar experiences. The peer counsellors were trained to identify the most troubling cases and to work with asylum seekers to develop coping techniques for stress and anxiety. The successes of the

[57] <http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2017-2022/2017/executive-office/2617.pdf>

[58] <https://www.health-ni.gov.uk/sites/default/files/consultations/health/protect-life-2-consultation.pdf>

[59] http://www.belfasttrust.hscni.net/pdf/BME_Cultural_Awareness_Document_sml.pdf

[60] <https://www.theguardian.com/world/2017/aug/31/germany-turns-refugees-into-mental-health-counsellors-for-their-peers>

programme were two-fold; firstly it countered feelings of boredom and loneliness by employing refugees to deliver mental health services to their peers. Secondly, it was able to break down cultural and language barriers as well as the stigma associated with therapy within the asylum and refugee community. If a similar project to this was implemented in Belfast it would be greatly beneficial and empowering to the whole community of asylum seekers and refugees.

- GP practices remove charges for letters and medical reports for asylum seekers which can cost up to £50. These letters are used as evidence for the person's asylum claim and for support organisations to advocate on their behalf.

Open call to Allies:

- Organisations providing counselling, mental health services, and medical professionals join Housing4All's coalition to develop practical initiatives aimed at addressing some of the root causes of mental ill health experienced by asylum seekers and their families. Housing4All also call on those named above to work with Housing4All to deal with discrimination against asylum seekers and the stigma around mental health within the asylum seeking community

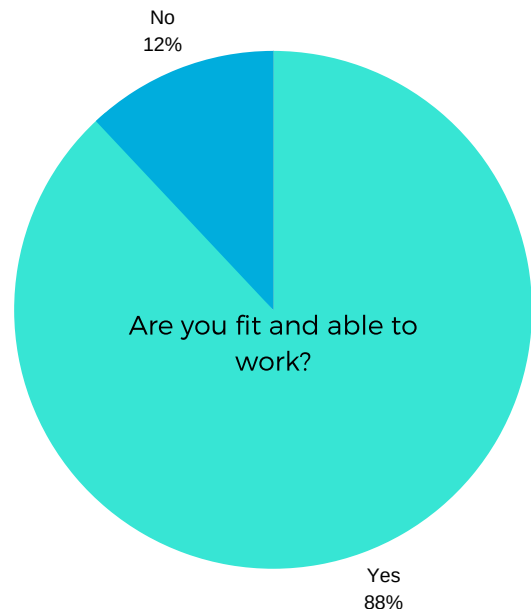
ANALYSIS OF SURVEY RESULTS

RIGHT TO WORK

Indicator: Percentage of asylum seekers excluded from accessing employment.

Baseline: 100% of asylum seekers are excluded from accessing employment.

Benchmark: Reduced to 0% by June 2020



The Asylum and Immigration Act 1996 [61], made it illegal for asylum seekers to work. This was later replaced by the 2006 Immigration, Asylum, and Nationality Act. Further, it is a criminal offence for an asylum seeker to work in the UK. In the North of Ireland this is punishable by a maximum 6 month prison sentence and a fine. This policy was introduced by the Blair Labour Government in 1999 as part of their measures to 'crack down' on immigration. Theresa May is most infamously associated with the Hostile Environment policies, but in fact it was the Blair Government that first introduced indefinite detention and enforced destitution.

One of the reasons the ban on working was introduced was to propagate the myth that employment is a principle pull factor for asylum seekers. However, the Home Office's own research [62] states that there is no evidence to suggest a long term correlation between labour market access and applications for asylum. The research recommended unrestricted labour market access after 6 months.

People who were surveyed by Housing4All included bankers, doctors, mechanics, chefs, pharmacists, teachers, accountants, retail workers, lawyers, fishermen, electricians, computer engineers and farmers in

[61] <https://www.legislation.gov.uk/ukpga/1996/49/contents>

[62] <http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.473.3461&rep=rep1&type=pdf>

their home countries. There is such a vast set of skills unused. "Imagine someone who has been working for a long time in his own country providing for himself. Then he comes here and gets £35 per week and he knows if he is working he could give that £35 to 10 people".

Housing4All see the right to work as a solution to many of the problems experienced by asylum seekers. It is explicitly linked to mental ill-health, as denial of working rights leads to isolation and depression as mentioned above. If people seeking asylum were given the right to work they would also be able to afford food and other essential items for their family. They would be able to afford to rent their own houses and would be less likely to fall into destitution.

International Human Rights Law

The International Covenant on Economic, Social, and Cultural Rights, recognises "the right to work, which includes the right of everyone to the opportunity to gain his living by work which he freely chooses or accepts [62]". The Committee on the Elimination of Racial Discrimination, in its General Comment 30, recommends that states "remove obstacles that prevent the enjoyment of economic, social and cultural rights by non-citizens, notably in the areas of education, housing, and employment, and health" [63].

It also states that "people on the move have the right to participate in their own care and support as decision makers and as co-creators of support regimes. Restrictions on their ability to work, obtain an education, or otherwise participate meaningfully and equally in their host communities are incompatible with the right to health and should be eliminated" [64].

Local Policy

Under the Immigration, Asylum and Nationality Act 2006 [65], it is a criminal offence for an asylum seeker to work in the UK. In the North of Ireland it is punishable by a maximum 6 month prison sentence and a fine.

Under the NI Executive Draft Programme for Government, the Department for Economy[66] has responsibility for Indicator 16, 'increase the proportion of people in work'.

The Department for Communities[67] has responsibility for both Indicator 17, 'reduce economic inactivity' and Indicator 32, 'increase economic opportunities for our most deprived communities'.

Recommendations:

- Following the lead of almost every other EU country, Home Office lift the ban on the right to work and allow asylum

[62] <https://www.ohchr.org/en/professionalinterest/pages/cescr.aspx>

[63] <http://hrlibrary.umn.edu/gencomm/genrec30.html>

[64] IBID

[65] <https://www.legislation.gov.uk/ukpga/2006/13/crossheading/employment>

[66] <https://www.northernireland.gov.uk/consultations/draft-programme-government-framework-2016-21-and-questionnaire>

[67] IBID

seekers to work after 6 months of making their claim for asylum. Home Office's own research shows there is no correlation between number of asylum claims and employment access. The blanket employment ban damages the mental health and wellbeing of people seeking asylum and should be ended.

- Belfast City Council, led by the Lord Mayor, seek a meeting with the Home Office to advocate for employment rights for asylum seekers.
- Belfast City Council and Department for Communities establish a sub-committee in the following 2019/2020 term to develop plans for 'Timebanking', which provides non-monetary ways for asylum seekers and non-asylum seekers to exchange goods and services.

Open Call to Allies:

- Trade Unions, third sector organisations and civil society, pledge your support to the Lift the Ban campaign.

CONCLUSION

This report has outlined the rights denied to people seeking asylum in the north of Ireland in relation to destitution, housing conditions, food poverty, children's issues, mental health, and the right to work. It has told the story of a system of seeking asylum which leaves people deliberately homeless. Those who have homes, often live in poor conditions which threaten their health. There is such a culture of fear, that people would rather say nothing and endure these conditions than risk affecting their asylum claim.

This report has shown food poverty to be the norm amongst the asylum seeking community and that families with children particularly suffer. Children from asylum seeking families are excluded from so much because of the conditions imposed upon their parents by the Home Office.

The system of seeking asylum in the UK causes serious damage to the mental health of people who are already suffering because of what they have experienced in the course of their flight. This has further negative impacts on their families and children. Many of the issues raised in this report could be solved by lifting the ban on employment for people seeking asylum. It would allow them to integrate better in their new community, it would enable them to provide for themselves and their families, restoring their dignity and helping them to heal.

It remains the view of Housing4All that the policies which result in the denial of these rights are a deliberate creation of the Home Office, designed to exhaust, frustrate, and punish people who come to the UK seeking sanctuary from persecution and violence.

Housing4All call upon the statutory duty bearers in the north of Ireland to protect the rights of people seeking asylum here by implementing the recommendations of this report. We also invite our allies to lend their support to our campaign.



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