

Collette Stevenson MSP
Convener, Social Justice and Social Security Committee
Scottish Parliament
Edinburgh
EH1 3DG

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Dear Collette

Re: Refugee housing

Thank you for the opportunity to give oral evidence to the Committee on 29 February. As you heard during that session, and from other witnesses, we have observed a deterioration in protection for refugees and people seeking asylum in Scotland. The Committee's consideration of these groups in relation to housing and homelessness is timely and welcome.

We have seen the Scottish Government's commitment to supporting people seeking safety through a range of strategies and sponsorship programmes. However, there continues to be evidence of gaps in the safety net and in some cases, a lack of preparation for changes. There are also opportunities to learn and embed experiences from schemes such as Ukraine. Building on the evidence I gave on 29 February, there are two areas the British Red Cross would be keen for the Committee to highlight in its report.

Firstly, the importance of an action plan to respond to a more difficult environment for people in the UK asylum system. The Committee has heard from local authorities about the pressures exacerbated by the reduction in the move-on period. Alongside this, the asylum system is being expanded across Scotland and we see multiple gaps in support, with widening dispersal, a growth in institutional settings, like hotels, and a concerning increase in the number of asylum cases that are being withdrawn, which amplifies risks for the people we support.

This is creating additional ambiguity over housing regulation. For instance, how Scottish statutory agencies can regulate room sharing as a result of Operation Maximise, which is being implemented despite it being in contravention of the Scottish Government's [Unsuitable Accommodation Order](#), the additional standards as set out in the [Temporary Accommodation Standards Framework](#) and the [Code of Guidance on Homelessness](#), which sets out standards

such as recognition of past trauma and ensuring people have a bedroom that is safe, private and lockable.

We published evidence into the risks that are amplified by the use of institutional accommodation in the UK asylum system in research in 2022, [Far from A Home](#). In the last year in Scotland, we have seen casework relating to hotels increase by over 900 percent. When clients are in hotels, their needs are different: they are three times more likely to require mental health support, with higher rates of concerns for safeguarding, trafficking, suicide risks and far right activity.

These changes in the system are also leading to increased destitution to which the voluntary sector and local government is struggling to adequately respond. We have been proud to deliver the Scottish Crisis Fund, as part of the government's Ending Destitution Together strategy. Since its inception, it has provided an essential safety net to over 3,000 people with emergency cash support, including over 900 children. There is now the opportunity for longer term funding for this strategy.

The Committee may want to recommend that the Scottish Government:

- **Publishes an action plan to enable local authorities and the voluntary sector to respond to changes in the asylum system.**
- **Ensures anti-destitution and integration strategies receive long-term, sustainable funding.**
- **Reviews regulation of housing for people in the asylum system to ensure people's basic needs are met and agencies proactively investigate potential failures.**

Secondly, we have witnessed a significant rise in local authorities failing to meet basic levels of care for children in the asylum system. Last year, the Equalities, Human Rights and Civil Justice Committee highlighted the issue of child asylum seekers being placed in adult asylum hotels. We continue to witness this trend and believe the situation is worsening, with social work unwilling to undertake full age assessments, despite additional interventions such as that of the Children and Young People's Commissioner on the situation in its report [Sometimes I Feel Like I Am In Prison](#).

In Glasgow, we have seen social work pass age disputed young people to Police Scotland for a 'live scan' but we have been unable to ascertain any guidance which sets out why this change in process has taken place. Evidence from our casework suggests these scans simply confirm biometrics taken at the young person's point of entry and not a full age assessment. Consequentially, it is becoming necessary for young people to engage with lawyers and in some cases seek a judicial review before local authorities will treat them as children.

In our own case load, 90 percent of young people supported were not provided with appropriate accommodation even after legal proceedings were initiated by solicitors against the local authority challenging the age assessment practice. Last year, our specialist team supported 44 young people, 32 percent of whom had their age disputed. The majority of these cases needed an intervention by a solicitor. In extreme cases, it has taken two years of advocacy to secure a full age assessment.

We have serious concerns about the risk of abduction, trafficking and exploitation of these young people. Some of the children we have been supporting are living alone in adult hotels, alongside over 100 men. This amplifies concerns outlined in our report jointly published with UNHCR in 2022, [At Risk: Exploitation and the UK Asylum System](#).

The Committee may wish to take further evidence on asylum seeking children being placed in hotels. It may also want to recommend that the Scottish Government clarifies the responsibilities of local authorities in respect to age disputed young people.

Thank you again for taking evidence on this important issue.

Yours sincerely

Phil Arnold
Head of Refugee Support – Scotland, Wales and N Ireland