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APPG ON SOCIAL INTEGRATION: SUBMISSIONS TO THE CALL FOR EVIDENCE

THIS DOCUMENT CONTAINS THE FULL TEXT OF WRITTEN SUBMISSIONS RECEIVED BY THE
APPG ON SOCIAL INTEGRATION AS PART OF STAGE TWO OF ITS INQUIRY INTO INTEGRATION
AND IMMIGRATION

CALL FOR WRITTEN EVIDENCE FOR THIS STAGE OF THE INQUIRY WAS RELEASED ON THE
APPG WEBSITE ON 3 FEBRUARY 2017 AND WAS OPEN TO ALL INDIVIDUALS AND
ORGANISATIONS

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TERMS OF REFERENCE

1. **English language provision**

- a) How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes be improved?
- b) What role, if any, should central and local government, businesses, and service users play in the funding and delivery of these initiatives?
- c) What are the advantages and disadvantages of college-based ESOL provision and community-based English language programmes, respectively?

2. **Barriers to participation**

- a) What are the most common barriers to participation in English language classes?
- b) How can these be overcome?

3. **Devolution of immigration policy**

- a) To what extent could some of the responsibility for immigration be transferred to devolved governments, metro-regions, Local Enterprise Partnerships, or groups of local authorities?
- b) How might the establishment of a regionally led immigration system impact, positively or negatively, on levels of integration?
- c) How might it impact on the political and public debate on immigration issues?

4. **Drawing on international examples**

- a) Are there any international examples of successful regionally-led immigration systems which UK policymakers might draw upon?
- b) How has the system in question affected migrant settlement patterns and levels of migrant integration and community cohesion?

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ACTION FOR ESOL

Action for ESOL is a group of ESOL teachers, students and researchers who campaign to defend funding for ESOL.

English language provision

How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes be improved?

It is important to be clear about what is meant by “community-based English language programmes” as in recent years they have been a series of initiatives which have used volunteer teachers to deliver programmes. This can only ever be a short term solution as ESOL teaching is a highly specialised skill and the UK has a large body of qualified practitioners who have been engaged with the development of provision. ESOL provision should be delivered by paid professional teachers to ensure a level of quality across the country.

Provision could be improved if it was free for all. Currently the use of means-testing means once ESOL students obtain low paid jobs they often can no longer study. Many migrants bring with them vital skills and experience from their own countries and should not be prevented from progressing in work purely because of their unmet ESOL needs. In low paid families English language learning may not be a financial priority.

There is also a focus on accreditation in current provision. Provision should be focussed on the needs of the students in the community. If accreditation is inappropriate, for example for those with limited educational background, then this should not mean there isn't provision available.

ESOL provision is at its best when it serves the local community. It should be locally based and available at different locations in a geographical area. It needs to be delivered in a variety of settings in order to fulfil the needs of the local community. Different students will benefit from FE or local community provision. A big barrier to mothers enrolling on course is childcare, so to maximise the participation, free childcare should be provided.

What are the advantages and disadvantages of college-based ESOL provision and community-based English language programmes, respectively?

College-based ESOL provision offers a formal learning environment with the opportunity for students to have a smooth progression route onto embedded, vocational and higher education courses. A wide range of facilities and learning resources is also often available to students on site, e.g. IT access, library, self-study areas, sport facilities and IAG/welfare advice. As a result, ESOL courses in colleges are particularly suitable for young learners as well as those adult students who have overcome many of the learning barriers addressed in section 2a. Additional

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learning support has historically been another advantage of college-based provision, although its availability has steadily declined over the past few years due to funding cuts. It should be noted that some FE colleges offer classes in community settings such as schools and local centres as part of their provision.

Community-based ESOL provision, on the other hand, offers an educational environment within the friendly, welcoming atmosphere of the local community. A variety of non-accredited courses are accessible by those who are not ready to take exams, which makes community-based provision an ideal first step onto education. Timetables and facilities are adapted according to the needs of the local users; parents, older students with mobility issues and learners with health problems find this particularly useful. The provision of childcare as well as family learning programmes, which is often offered by community organisations, is invaluable to many women and parents who would otherwise have no access to education. The fact that the courses are available locally increases the participants' chances of making connections; broadening their support networks and making them feel part of their community.

A key strength of both types of ESOL provision is that where they employ professional, qualified teachers; this has a strong impact on the quality, stability and continuity of the programmes, especially in organisations where secure contracts are used. When provision relies too much on volunteer teachers it is much harder to maintain this.

In summary, both types of provision – college and community-based - offer ESOL courses which are essential to serving the disparate needs of the local community: each is accessed by students who are at different stages of their learning journey and have different educational requirements.

Barriers to participation

Teachers who are part of Action for ESOL note the following as significant barriers affecting access to ESOL classes:

- Insufficient places in classes
- Learners' / potential learners' lack of knowledge of provision
- Work commitments
- Low prior educational background
- Childcare
- Cost
- Health
- Location of classes and the need to travel

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These responses from teachers are largely reinforced by data from the Hackney ESOL Advice Service from the 2015-16 academic year.

On registering with the service, learners who have not attended an ESOL class before are asked why this is. Discounting those who had not joined a class because they were newly arrived in the UK, the most common response was because the learner was **looking after children, had family commitments, or because of pregnancy**, together constituting 98 out of 242 responses. **Work commitments** were also a significant barrier, cited 52 times. **Not knowing about classes** was cited 11 times. There being **no spaces available in a class** was given as a response 10 times. Other responses given, constituting between 5 and 10 each included **cost** of classes, the learners' **health issues**, and **lack of crèche provision**.

Those who have attended a class in the past are asked why they stopped attending. Of the 526 responses received, a total of 121 responses given were that the learner was **looking after children, had family commitments, or because of pregnancy**. Another very common response was that **no progression route was offered**, cited 109 times. **Health issues** were cited more commonly in response to this question than the one above, 53 times. **Work commitments** was given a response to this question 50 times. Other responses given more than 10 times each included **relocation**, the learner having **too far to travel**, the **cost** of the class, and the **closure of the provider**.

A survey by NATECLA in 2014 showed that 80% of providers had waiting lists of up to 1000 people to access courses and this was particularly acute at lower levels. The main reason given was lack of funding to run courses, and particular concerns were also raised about funding learners at the lowest levels, this may be linked to the accreditation issue mentioned above. In comments, many of the respondents echoed the concerns about the need for childcare provision found in the Hackney survey.

It is clear that a reversal of the cuts made since 2009 is needed to overcome these barriers. It is also vital that any approach takes the time to listen to learners' needs in terms of flexibility around childcare, work commitments, location and the kind of curriculum that will be appropriate to their needs. Any approach should work together with local communities to ensure that it responds to their needs.

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ALLAN, ALASDAIR, MSP, MINISTER FOR INTERNATIONAL
DEVELOPMENT AND EUROPE

13 March 2017

All Party Parliamentary Group for Social Integration
Inquiry into Immigration and Integration
Scottish Government written submission

Dear Chair

I am writing in response to the All Party Parliamentary Group for Social Integration's call for evidence for Stage Two of its inquiry into immigration and integration. The Scottish Government welcomes this inquiry, and this response focuses on Principle Three as identified in the Group's report, around the need for a reassessment of the UK Government's current 'one size fits all' approach to immigration policy.

Scotland's demographic challenges

The Scottish Government has long pressed the UK Government to deliver a flexible immigration system that meets Scotland's needs. That is because controlled migration is important to Scotland's future, both in terms of contributing to sustainable economic growth and mitigating the effects of demographic change.

Stimulating population growth is a key driver of sustainable economic growth. As I set out in the evidence presented to the Home Affairs Committee's recent Inquiry into immigration, in Scotland, most of our population growth is supported by inward migration. We know that the population of Scotland is projected to increase by 7% between 2014 and 2039. However, we also know that 90% of the increase over the next ten years is projected to come from migration, with 57% from net international migration and 32% from net migration from the rest of the UK. This is markedly different to the projections for the UK as a whole, where 51% of the projected population increase over the next 10 years is due to natural change and

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49% is due to migration. If current trends continue, net inward migration is projected to be the main contributor to Scotland's population growth over the next 25 years.

Population growth is also important for supporting the population and viability of businesses in Scotland's many rural and coastal communities, to ensure that local industries have access to a labour force that allows businesses to compete and grow. Within Scotland there are specific challenges faced by many of our rural and island communities. While Scotland's population is growing, this growth is uneven across our communities. Many Local Authority areas, particularly those which include Scotland's Islands, are expected to experience population decline over the next 25 years. For example the latest population projections show that the population decline in Na h-Eileanan Siar is projected to be minus 14%. This is followed by decline of 12% in Inverclyde, 8% in Argyll & Bute, and 7.5% in North Ayrshire. This is extremely worrying, and a huge challenge for Scotland's local areas.

We also know that people in Scotland are living longer. The number of older people in Scotland is projected to increase significantly with the population aged 75 and over projected to increase by 85% by 2039. Scotland's median age (the age where half the population is above that age and half below) is currently almost two years higher than the UK. Scotland's median age is projected to rise from 41.9 years to 45.2 years by 2039 compared with 40.0 years to 42.9 years for the UK as a whole. Given these demographic challenges, inward migration can play an important role in helping tackle our ageing population.

The need for a more flexible immigration system in the UK

A key priority in addressing our ageing population is attracting working age migrants to make Scotland their home. That is why we need the UK Government to deliver an immigration system that meets Scotland's needs – because we depend heavily on new Scots to support our economy and communities.

The Scottish Government fundamentally disagrees with the UK's target to reduce immigration 'to the tens of thousands'. The UK Government's immigration rules and restrictions should be in themselves sufficient to adequately manage migration without additional, arbitrary targets which take no account of the valuable contribution migrants make to our society and economy. We think that a fair and sensible immigration system should be sufficient to manage numbers of migrants without an arbitrary cap which sends the wrong message to those looking to make Scotland their home.

Scotland works hard to attract people to live and work here, including from the rest of the UK. In fact, in every year since 2000/01, more people have moved to Scotland from the rest of the UK than moved in the opposite direction. But our efforts to attract and retain people are hampered by an overly restrictive and inflexible immigration system that creates barriers to business and industry in Scotland accessing the talent it needs to grow.

Too many harmful UK Government policies are driven by the net migration target, for example, the new Immigration Skills Charge, which will penalise Scottish businesses for employing the skilled migrants they need. The charge constitutes an additional bureaucratic and financial burden on Scottish businesses, on the public sector and on charities, and we are extremely concerned that it will act as a barrier to the employment of skilled staff. We also remain deeply concerned that the UK Government's restrictions on family migration are having a damaging impact on many ordinary, hard-working Scottish citizens, their families and our economy. The UK Government has increased financial thresholds for spousal visas and made it more difficult for family members from overseas to join British citizens. We

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support greater flexibility in these rules and continue to call for a less restrictive and more humane system that recognises individual circumstances, and provides a welcoming environment for new Scots and their families.

The UK immigration system needs to provide for regional and national differences, and we welcome the Group's calls for the devolution of a degree of control over immigration policy to meet specific regional needs and to mitigate demographic challenges. Scotland's needs are different from those in the rest of the UK. For example, where there are regional salary differentials, a 'one-size fits all' approach simply will not do. Scottish salary levels are different from those in the South-East of England and it is not reasonable that a single threshold is used throughout the UK. Scotland deserves the same chances as any other part of the UK, and the existing points-based system could be adapted to provide greater flexibility and reflect regional differences.

Although Scotland has long been an attractive destination for international students, current UK student visa policies send a negative message to prospective students and the impact of this is of significant concern to us and to the higher education sector. As well as calling for more flexibility within the current student visa regime, we have called repeatedly for a return of a dedicated post-study work immigration route for Scotland, and we note the Group's consideration of the Fresh Talent scheme which previously enabled international graduates of Scottish institutions to remain in Scotland for two years to work. Such a route would be an important lever for attracting the best international student talent, securing essential income streams, and allowing talented graduates to continue contributing to Scotland after their studies end.

There is consensus in Scotland, amongst business, the Higher Education sector and every political party represented in Holyrood that we need a return of a post study route to allow talented students to remain and contribute to the Scottish economy. The outcome of the EU referendum makes it even more important that the UK Government honours the recommendation in the Smith report to explore a potential post-study work route to ensure Scotland continues to attract and retain talent from around the world.

The need for a differentiated immigration system across the UK is not only a view held by the Scottish Government. The Group will be aware of the Scottish Affairs Committee's report on the 'Demography of Scotland and Implications for Devolution' which underlined the need for Scotland to have immigration policies which are tailored to suit our demographic and workforce needs. We welcomed this report which also called for the UK Government to work constructively with the Scottish Government to look at introducing a post study work route for Scotland. The Scottish Parliament's Culture, Tourism, Europe and External Relations Committee report on EU Migration and EU Citizens' Rights also concludes there should be a bespoke or differentiated immigration solution for Scotland in the future. The full report can be accessed here [CTEERC - EU Migration and EU Citizen's Rights](#).

Differentiated immigration systems in other countries

I note the Group's interest in the Canadian immigration system and how this could be used as a model for a differentiated approach in the UK. Canada is a good example of where there is political will, all areas of a country can be empowered to have systems in place that meet their needs. It demonstrates that you can successfully operate a differentiated immigration model within a single country.

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For example, like Scotland, Canada struggles to attract skilled migrants to more remote areas and we are aware of the Provincial Nominee Program, where applicants with certain skills face a lower immigration points threshold if they agree to live and work in a particular province for a minimum amount of time. And there is also of course the Canada-Quebec Accord which devolves responsibility for immigration to the province. We are also aware that Australia seeks to grow its population in remote areas through regional flexibilities in its immigration system.

So, there are already successful examples of differentiated immigration systems. These allow Provinces in Canada and Territories and States in Australia to identify and address their own specific population challenges by flexing the requirements of the national immigration system. These systems do not create borders or barriers between provinces or states.

The public debate on immigration

The Scottish Government has repeatedly called for an increased maturity and responsibility in how migration is discussed. The onus is on all of us to be conscientious as we choose our words. The EU referendum campaign of last year fuelled misconceptions and propelled divisive and inflammatory statements regarding migration to the front pages of national newspapers. The impact of such negative rhetoric on the everyday lives of those who have chosen to make Scotland their home is of great concern to Scottish Ministers. As such, the Scottish Government has been pushing for positive change in the way that migration is discussed. Since the referendum, we have made it a priority to counter divisive statements regarding migration with reassurance and appreciation for our migrant communities.

It is also about myth busting. Contrary to the claims about the negative impacts of immigration, there is robust evidence that migrants are not a drain on society and can contribute significantly if they are given the same rights and opportunities as any other citizen.

The Group may be interested in some research which we recently published which actually helps to debunk many of the myths surrounding migration and in turn attempts to improve the tone of the immigration debate. The research confirms the long standing view of the Scottish Government that our migrant workforce makes positive contributions to our economy and local communities. Many sectors of the Scottish economy are reliant on migrant labour, which helps meet demand for labour and also address skills shortages.

This research disproves claims that migrants are a strain on the benefits system, and finds that in particular, Scotland's recent non-UK migrants are actually more likely to be in work than people born in Scotland. Another popular myth is that migrants "force down" wages. In reality, studies have found little or no impact on average wages as a result of migration, particularly in periods when the economy is strong. Where adverse effects on wages due to migration do exist, they are actually likely to be greatest for workers who are themselves migrants. I include a link to the research entitled 'The Impacts of Migrants and Migration into Scotland' here: <http://www.gov.scot/Publications/2016/10/5974>.

Moving forward, we will continue to utilise this evidence to help shape opinion on migration.

Conclusion

It is crucial that Scotland has an immigration system which enables businesses to attract and access the skills and talent needed to boost Scotland's long-term competitiveness and to

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support Scotland's Economic Strategy. We also need to keep attracting the best international talent to our universities and colleges.

We understand that the UK Government are planning to consult on the UK points based system, and on future UK immigration arrangements for EU/EEA nationals. As these changes will no doubt be driven by the UK's net migration target, the Scottish Government is extremely concerned about the potential negative impacts for Scotland. Migration is key to supporting sustainable population growth and any move to limit migration, whether from within or beyond the EU, has the potential to seriously harm our economy.

I hope that this written submission is useful in explaining the Scottish Government perspective on the importance of inward migration and in highlighting Scotland's specific requirements. We must ensure that Scotland is not negatively affected by the UK Government's desire to reduce net migration, and Scottish Ministers will continue to press the UK Government to deliver an immigration system that meets Scotland's needs.



ALASDAIR ALLAN

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BMENATIONAL & HUMAN CITY INSTITUTE

Introduction

This response to the call for evidence from the APPG on Social Integration comes at a time when BMENational, the representative body for more than 70 black and minority (BME) housing organisations in England, is working towards offering future support to help new migrant successfully integrate into UK communities.

This response to the APPG on Social Integration's call for evidence is based on what BMENational has achieved to date, documented by our research partner, the Human City Institute (HCI), and some plans for the future.

It draws on major research undertaken by HCI over the last two years. Links to the research are shown in the text. More information about the two organisations is shown at the end of the submission.

About BME Housing Organisations

BME housing organisations are a small, but certainly vital part of the social housing sector in England. We represent around 2-3% of the housing association stock. Collectively, the 70 BME housing organisations manage 65,000 homes, with an estimated annual turnover of £600m and controlling assets valued at around £1.8bn.

BME housing organisations act as key community-based agencies with which BME people can identify. We reach out to disadvantaged communities, meet 'hidden' housing needs and offer culturally sensitive services. But perhaps most importantly, BME housing organisations are deeply embedded in the most disadvantaged communities, creating significant social value through a range of community initiatives.

Most of our contractors are local ensuring that investment stays in the community. BME housing organisations remain anchored in the communities that founded them. And we are bridges between communities and key vehicles for local people to have a say in how their housing is managed and developed. BME housing organisations are major successes for BME communities enabling local assets to be controlled by these communities and considerable social capital to be built.

Our legacy and current work includes the creation of significant economic value in often fragile local economies. More than £200m in Gross Value Added (GVA) is generated from investment in development, repairs and maintenance, local procurement and expenditure in direct and indirect supply chains.

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This investment sustains 1,000 jobs in local economies on top of the 3,500 people employed directly by the BME housing sector. The presence of BME housing organisations in the most disadvantaged communities is a bulwark against poverty, discrimination and austerity at a very difficult time for people on low incomes and benefits. We invest £150m yearly in communities. Overall, for every £1 spent by the BME housing sector, between £2 and £5 in additional social value is generated.

The Housing Needs of Migrant Communities

Our extensive research reveals that the nation's migrant communities – old and new – tend to experience greater levels of housing need than the existing population in the UK:

- They are far more likely to be homeless and rough sleeping.
- More often living in overcrowded or poor standard housing; especially in the private rented sector.
- More frequently live in fuel poverty.
- Far more likely to live in deprived neighbourhoods and housing stress.

More than two thirds of all tenants of BME housing organisations are from migrant communities. BME housing organisations accommodate mainly South-East Asians, African-Caribbeans, Chinese, Vietnamese, Jewish, Irish, Filipinos, Tamils and Kurds. We increasingly assist non-BME people and new migrants (including from Eastern Europe). Refugees from various war zones past and present are also supported by BME housing organisations.

Call for Evidence: Principle 4

The submission sets out to answer mainly **Principle Four – ‘for new migrants, integration should begin upon arrival in the UK’**.

The experience of our members, many of whom specialise in supporting new migrants and others who offer housing and community services to migrant communities of longstanding, points to the need for early integration of migrants into communities that are tolerant and able to offer support.

This requires that an existing community infrastructure is in place. BME housing organisations are able to provide such an infrastructures in already multi-ethnic neighbourhoods in the many of the nation's cities and large.

BME housing organisations are community anchor organisations with more than thirty years of experience of helping migrant communities integrate. And although this service is under pressure from a range of public policies that impinge on our service (such as rent reductions,

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welfare reform, local authority services retrenching), BME housing organisations still offer a range of support to new migrants:

- Temporary and permanent accommodation, plus care and support.
- Resettlement services, including help with setting-up a home.
- Money, benefits and legal advice.
- Language skills through on-site and partner workshops.
- Linking to existing members/agencies of migrant communities.
- Helping through social investment and entrepreneurship.

HCI's [research](#) included nine focus groups with 110 tenants of BME housing organisations across the country. These are some responses about how the BME housing sector aids social integration:

- They bring different cultures together.
- They helps us with languages – reading and writing.
- They understand that communities want to be together as it is the way we want to live.
- They help BME people, because they know that they want to be together and they help them to build their own local network.
- They promote tolerance amongst different communities.
- We all have to live together and we embrace each other's culture and welcome each other, nobody wants to leave their home.
- They feel like family and we are part of that family and it feels good.
- They provide Money Advice services and they will help you to understand benefits and support available to you.
- They started small but have grown to try to meet all community needs.

The Role of BME Housing Organisations in Promoting Social Integration

The role of BME housing organisations in promoting social integration suggests the following are important:

- Being able to offer accommodation alongside support and advice from an early stage.
- Already working in migrant communities stretching back many decades.
- Delivering culturally sensitive services.
- Offering a 'zone' of safety and support networks in the community.
- Pathways to settlement, employment, social mobility and enhanced life chances.

Two more recent service approaches have included our [Housing Rights](#) website for new migrants of all designations; and our 'pledge to migrant people' (see overleaf).

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The BMENational Sponsored Pledge

A selection of BME housing organisations, and a few mainstream housing associations, have developed a pledge to migrant people. Below is a summary of the key ingredients in the pledge.

1. Provide a safe and welcoming environment to migrants seeking someone they can trust.

Fundamental commitments: migrants contacting service points should be welcomed; information welcoming migrants should be displayed on organisational websites, in printed materials and at service contact points.

Aspirational commitments: for organisations to reach out to migrants in the community; to provide temporary or permanent accommodation to migrants.

2. Train board members and staff so that they are informed advocates for vulnerable migrants.

Fundamental commitments: board members and staff can refer to the [Housing Rights](#) website created by BMENational and the Chartered Institute of Housing; board members and staff can draw upon the briefings already provided to them by individual BME housing organisations about the current experiences of migrants.

Aspirational commitments: for organisations to develop a migrant ambassador in their staff teams, equipped to champion the rights of migrants alongside their existing role.

3. Work with staff, communities and partners to increase understanding of the issues facing migrants and to break down prejudice.

Fundamental commitments: housing organisations should be in dialogue with a migrant community agency to increase understanding of the migrant experience; offer 'in kind' support, such as meeting facilities, administrative support, allocate space in newsletters and/or websites, to migrant partner organisations.

Aspirational commitments: housing organisations should provide regular support to migrant agency partners, such as advice surgery for migrant agency staff, staff volunteering by housing organisations, assistance with governance, revenue funding.

Conclusion

BMENational and HCI hope that the above has offered some valuable insights into our work and experience with migrant communities together with a comprehensive evidence base. Both organisations offer support to the APPG on Social Integration should it be required.

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13th March 2017

About BMENational

BMENational is a collective of around 70 BME housing organisations operating in England. It acts under the auspices of the National Housing Federation collaborating with the NHF to influence national housing policy and providing a consultative and promotional platform for BME housing issues.

BMENational highlights the contribution BME housing organisations make to successful, vibrant and integrated communities while promoting equality and diversity in the delivery of housing and services.

www.bmenational.wordpress.com

About the Human City Institute

HCI is an independent, charitable 'think tank' based in Birmingham undertaking research into 'human city' issues, investigating exclusion, and promoting solutions to the problems of the most disadvantaged groups in today's complex and diverse cities, towns and communities.

HCI works around research themes that incorporate new visions for housing, mutualism and social value, health, wealth and life chances, no community left behind, and studies of age cohorts such as the young and older people.

www.humancityinstitute.wordpress.com

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BORDERS COLLEGE

Borders College works in partnership with Scottish Borders Council CLD Services to provide a single point of access for ESOL provision within the Scottish Borders. This partnership is responsible for:

- Developing and maintaining a single point of contact for all ESOL enquiries within the Scottish Borders;
- Co-ordinating and undertaking partnership initial assessment of needs using the National Assessment Toolkit;
- Planning, developing and delivering ESOL provision throughout the Scottish Borders to meet demand;
- Monitor and report on partnership progress

1. *a) How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes be improved?*

Response:

Additional funding would increase capacity to deliver a more flexible range of ESOL provision, increasing access to learners who face a range of barriers.

Recognition of the challenges of delivering ESOL in a rural area with very poor transport links.

Early confirmation of funding allocations from the government would aid longer term planning to allow providers to make better use of resources.

b) What role, if any, should central and local government, businesses, and service users play in the funding and delivery of these initiatives?

Service users should be given the opportunity to co-design learning provision so that it better meets the needs of ESOL learners.

It is important for Central Government to continue to specifically fund ESOL to allow this funding to be ring fenced for ESOL provision rather than being subsumed into local government and/or college core funding

Local government and Colleges should have a significant input into designing delivery based on the needs of the local economy.

Recognition of employer needs should be taken into account however employers should also be expected to make a financial contribution if delivery is solely based around their needs.

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Service users are often keen to make a contribution to their learning costs but are often working in very low paid jobs which can be a barrier to accessing provision if the cost is too high.

Whilst every effort is made to gather the voice of service users, there is sometimes more than one voice and it can be difficult to meet the needs of everyone .

c) What are the advantages and disadvantages of college-based ESOL provision and community-based English language programmes, respectively?

Response:

ESOL within the Scottish Borders is delivered jointly between SBC CLD Services and Borders College and this approach provides many advantages:

A blend of the two types of provision is ideal to provide a range of learning opportunities which meet the needs of all learners. There are times when learners need a very flexible, local provision and there are times when learners need a structured, accredited programme as a necessary stepping stone towards formal study, employment etc.

The partnership approach provides a clear curriculum pathway from community based learning to college based learning.

Transition from accredited learning to full time FE/HE provision is easier for some learners as they have become familiar with the College environment when accessing accredited classes.

Provision is based within local communities this allows the partnership to access partners' resources in areas where they do not have their own resources eg use of Community Centres and Fire Stations to delivery classes in small towns.

Learners in rural areas can often be socially isolated, ESOL classes provides learners with the opportunity to engage with other learners in similar circumstances. Often this can lead to informal support networks.

A rural area often lacks additional the support services (eg volunteer/advocates who may also have experience in delivering within an adult learning environment) that are available in larger areas of population.

Lack of sustainability makes it very difficult to rely on 3rd sector support groups

1. Barriers to participation

a) What are the most common barriers to participation in English language classes?

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In our experience the main barriers are

- Working patterns
- Rurality– in a very rural area it can be difficult to get together enough learners to form a small group, so the delivery model is expensive, and it can be difficult to source enough good quality tutors
- Childcare
- Poor public transport links can make it difficult for learners in isolated rural communities to access provision.

b) How can these be overcome?

Response:

- Greater involvement of employers in co-designing learning provision. If they were making a financial contribution this might improve?
- Funding, practice sharing to explore a range of delivery models, including use of technology
- Funding
- Funding to support development off on line learning

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BRIGHT BLUE

Submitted by: James Dobson (Researcher, Bright Blue) on behalf of [Bright Blue](#)

About the organisation: Bright Blue is an independent think tank and pressure group for liberal conservatism. We are dedicated to championing liberal, open, democratic and meritocratic institutions, values and policies.

English language provision

What role, if any, should central and local government, businesses, and service users play in the funding and delivery of these initiatives?

The ability to understand and speak English is critical to both interacting with the community and securing employment. While there should be an onus on migrants to ensure they can understand and speak English, central and local government must ensure they are playing their part by supporting the provision of English language courses. Since 2010, the funding for English Language courses has declined markedly. Considering the ongoing fiscal environment, reversing this in full is unlikely.

The fees for language course can be a deterrent for migrants wanting to learn or improve their English. The government currently provides income-contingent tuition fee loans for those aged 24 or above who have resided in the UK for at least three years and are studying for a qualification of at least Level 3 at a Further Education college. These loans are paid back once the learner has graduated and is paying tax. The Government should extend the income-contingent loan system to all migrants to be able to pay for an approved English language course. This would allow English Language course affordable for all. The repayment scheme for these loans could be designed in such a way as to minimise the subsidy from government.

Barriers to participation

What are the most common barriers to participation in English language classes?

There are several barriers to participation in English language courses. First, the cost of a course can be prohibitive to potential learners. Second, there can be a lack of an immediate incentives to enrol on an English language course. Third, there may be hard-to-reach groups where norms and pressures do not incentivise the learning of English.

How can these be overcome?

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As discussed earlier in this submission, the financial barriers to participation in English language classes can be overcome by ensuring that central and local government is providing sufficient funding for English language courses, and through the expansion of income-contingent loans to all migrants paying for an approved English language course.

Government could overcome the barrier of a lack of immediate incentive to learn English by stipulating that migrants must demonstrate that they can speak English by having an approved English language qualification, or that they are attempting to learn English by enrolling on a viable course to gain an approved qualification in English language, to receive any form of benefits. Currently, migrants only need to demonstrate that they can speak English, or are at least learning English, to receive *some* out-of-work benefits. This change would sharpen the incentive for migrants to learn English as soon as possible.

The barrier of hard-to-reach groups is a more challenging one to overcome. The recently published Casey Review drew attention to Muslim women – of which [22% report that they speak English “not well” or “not at all”](#). These women are likely to benefit from the aforementioned requirement to have an English language qualification, or be working towards one, to receive *any* form of benefits. Similarly, they will also benefit from the Government’s new £20 million English language tuition fund for isolated women. However, this barrier is deep-rooted and these changes are unlikely to eliminate the problem entirely. The Government should keep the progress of hard-reach-groups under review and should consider more radical action to ensure there is an expectation that everyone in our society has basic English language skills to participate both socially and economically..

Devolution of immigration policy

To what extent could some of the responsibility for immigration be transferred to devolved governments, metro-regions, Local Enterprise Partnerships, or groups of local authorities?

Devolving immigration to the regions of the United Kingdom is likely to be difficult. The UK’s small geographical size compared to other countries which have instigated such a system (for example, Australia and Canada) makes the enforcement of region specific visas more difficult.

However, there are some steps the Government could take to tailor immigration policies to the needs of the different regions of the UK. In April 2017, the minimum salary that is needed for a [Tier 2 work visa for experienced workers will increase to £30,000](#) – a 44% increase on the minimum salary from just a year ago. The minimum salary required for ‘new entrants’ remains at £20,800, which includes employees who are under 26 years old, those switching from Tier 4 visas, or those from certain other immigration categories.

These minimum salaries make no attempt to account for regional differences in median annual salaries. [Evidence suggests that salaries vary considerably.](#) The minimum salary for any type of

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Tier 2 visa should be regionalised with government deciding new minimum salaries for different regions. This policy could help help with economic aims such as strengthening skills and growth outside London and the South-East.

Further reading

In 2015, Bright Blue published a major research project entitled 'A balanced centre-right agenda on immigration', which included *A Manifesto for immigration*. The following three policy recommendations were recommended in this report:

- The Government should stipulate that all claimants need to demonstrate that they can speak English by having an approved qualification, or are enrolled on a viable course to gain an approved qualification in English language, to receive any form of benefits.
- The Government should extend the income-contingent loan system to all migrants paying for an approved English Language course.
- The minimum salary that is needed for an international graduate to secure a Tier 2 work visa should be regionalised with government deciding new minimum salaries for different regions.

In 2015, Bright Blue also produced a report examining how to promote more diverse social networks for disadvantaged people from ethnic minority groups, showing women are at the forefront of social integration by sending their children to key universal services such as nurseries and primary schools.

Later this year, Bright Blue will commence a new project which will analyse neighbourhood trust in the different local authorities of England. The final report - due to be published in early 2017 - will include a number of policies designed to increase trust levels.

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CENTRE FOR SOCIAL INVESTIGATION, NUFFIELD COLLEGE, OXFORD

Evidence submitted by the Centre for Social Investigation, Nuffield College, Oxford

In this submission we address Principle Four: ‘for new immigrants, integration should begin upon arrival in the UK’. We note that the OECD has advanced a very similar principle in its publication *Making Integration Work*, in which they state that the first lesson learned from the experience of OECD countries is that countries should “Provide activation and integration services as soon as possible for humanitarian migrants”. The OECD emphasizes furthermore that early intervention is particularly important where children are involved.¹ While OECD’s focus is on the integration of humanitarian migrants and asylum seekers, we believe that their evidence is highly relevant to the integration of migrants more generally.

Our review of the evidence suggests four main reasons why the earliest possible start on integration is essential. We argue that early integration measures, although valuable for all migrants, will be especially beneficial for young migrants arriving at critical stages of the life cycle. This will apply in particular with respect to the need to

- develop fluency in English (with its many attendant benefits),
- minimize the long-term ‘scarring’ effects of early unemployment
- take advantage of the potential for developing positive attitudes and identities at crucial ‘formative’ stages of socialization
- avoid the risks of downwards assimilation into the informal (black) economy or underclass.

First, *fluency in English* is essential for almost all other aspects of integration, and delays in developing fluency can be especially problematic for young people such as those arriving during the period of secondary schooling.² Failure to develop fluency during secondary schooling can have long-lasting impacts on young migrants’ ability to secure British qualifications such as GCSE and will in turn have important consequences for their subsequent labour market and social integration.³ In turn this runs the risk of leaving a pool of marginalized young people,

¹ OECD (2016), *Making Integration Work: Refugees and others in need of protection*, OECD Publishing, Paris.

<http://dx.doi.org/10.1787/9789264251236-en>

² OECD (2012b), *Untapped Skills: Realising the Potential of Immigrant Students*, PISA, OECD Publishing, Paris, <http://dx.doi.org/10.1787/9789264172470-en>.

³ Dustmann, C., Fabbri, F., Preston, I. and Wadsworth, J. 2005. Labour market performance of immigrants in the UK labour market, Home Office Online Report 05/03. Retrieved from

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who may be at great risk of being not in education, employment or training (NEET), with the known consequences of NEET for subsequent unemployment⁴ and disaffection.⁵ Early access to intensive language training is essential, therefore, especially for young people at these critical stages of the life cycle. Delaying this access can have particularly serious effects for young migrants, especially those arriving late in their school careers or shortly afterwards.

Second, there is substantial evidence of *the long-term scarring effects of unemployment*,⁶ and that these effects are particularly serious for those young people who experience lengthy periods of unemployment at the start of adulthood.⁷ Migrants are particularly at risk of this kind of scarring. They tend to have higher unemployment rates than the general population, and young migrants are even more vulnerable to unemployment than are young people born in Britain.⁸ As well as lacking English language or qualifications, young migrants, especially those who are not joining established and successful ethnic minority communities, will lack know-how about the operation of the British labour market and how best to navigate the British systems of training and job recruitment. They therefore struggle to get a foothold in the British labour market, even if they are fluent in English or have acquired recognized qualifications. Among those who have foreign qualifications, delays in securing recognition for their qualifications (or in securing equivalent British qualifications through further education) will also impede their access to the labour market. Active measures to support the search for jobs, training and recognition, adapted to the needs of migrants who will often be coming from countries with different institutional arrangements, will be important in order to speed the transition into the labour market and to avoid long-lasting scarring from prolonged unemployment or under-employment.

<http://discovery.ucl.ac.uk/16488/1/16488.pdf>. DEMOS Integration hub 'Society, integration and everyday life' <http://www.integrationhub.net/module/society-integration-and-everyday-life/> Muttarak, R. 2014. Generation, ethnic and religious diversity in friendship choice: exploring interethnic close ties in Britain, *Ethnic and Racial Studies* 37, no 1, 2014, pp 71–98

⁴ Godfrey, C., Hutton, S., Bradshaw, J., Coles, B., Craig, G. and Johnson, J. 2002. Estimating the Cost of Being 'Not in Education, Employment or Training' at age 16–18. Research Report RR346. London: DfES

⁵ Morrell G, S Scott, D McNeiksh and S Webster (2011) The August riots in England: understanding the involvement of young people. London: National Centre for Social Research.

⁶ P. Gregg (2001), 'The impact of youth unemployment on adult unemployment in NCDS', *Economic Journal*, 111(475), pp. F623-F653.

⁷ David Ellwood (1982), 'Teenage Unemployment: Permanent Scars or Temporary Blemishes?' in *The Youth Labor Market Problem: Its Nature, Causes and Consequences*, edited by Richard B. Freeman and David A. Wise, pp. 349-390. Chicago: University of Chicago Press, 1982. T.A. Mroz and T.H. Savage (2006), 'The long-term effects of youth unemployment', *Journal of Human Resources*, Spring, 41(2), pp. 259-293. R. Fairlie and L.G. Kletzer (2003), 'The long-term costs of job displacement among young workers,' *Industrial and Labor Relations Review*, 56(4), pp. 682-698.

⁸ Lualhati Santiago (in preparation) Integration gaps among the UK- and non-UK-born. Report for the ONS and DCLG.

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Third, there is evidence that migrants, especially those arriving from countries with authoritarian political regimes and inefficient or corrupt public services, arrive in Britain with highly *positive expectations and evaluations of British society*.⁹ These positive orientations may not persist if migrants experience discrimination or for other reasons fail to realize their hopes and aspirations. Theory suggests that the period immediately after immigration, especially for young adults, may represent a crucial formative period in their lives, and positive experiences at this stage may well have lasting implications for attitudes and a sense of British identity.¹⁰ Delay in incorporating young migrants into mainstream British society and into a sense of Britishness therefore risks missing crucial formative life stages as well as squandering the potential of their initial positive orientation.

Fourth, absence of positive integration assistance is likely to lead migrants to find other ways and means for adapting to life in Britain. There is evidence that failure to find regular employment for example will lead to *participation in the informal or black economy*.¹¹ While older migrants joining family in Britain may well find that the established ethnic community can meet many of their psycho-social needs, this may not apply in quite the same constructive way to younger migrants. Given the presence of some disaffected sections of the ethnic minority community (for example those who have experienced school exclusion or imprisonment), there is a risk that a lack of positive alternatives will be replaced by downwards assimilation into an underclass or counter-culture of the disaffected.¹²

We suggest therefore that an approach which focusses on the life cycle, and on the lasting consequences of early experiences on later outcomes, highlights the benefits of early assistance to overcome difficulties in integration. We also worry that failure to act early is not only wasteful of human resources but also increases risks of (socially expensive) adverse outcomes. From a cost-benefit point of view, early assistance provides greater benefits than delayed assistance. Furthermore the benefits are likely to be even greater the earlier in the life-cycle they can occur. The evidence suggests that a priority should be assistance for young people arriving during secondary schooling or in early adulthood. (Young migrants who arrive during or before primary schooling appear to have significantly better outcomes with respect to

⁹ Heath, A.F., Fisher, S.D., Rosenblatt, G., Sanders, D. and Sobolewska, M., 2013. The political integration of ethnic minorities in Britain. Oxford University Press

¹⁰ On the theory of formative experiences see Glen Elder (1974) *Children of the Great Depression* and N. Glenn (1987) *Cohort Analysis* and the extensive subsequent literature. On the experience of discrimination and its effect on national and ethnic identities see A. Heath et al (forthcoming) National and ethnic identities of young people. In F. Kalter (ed) (forthcoming) *Growing up in Diverse Europe*.

¹¹ Sorana Toma, PhD thesis, University of Oxford.

¹² See for example the extensive literature on the thesis of segmented assimilation, and of downwards assimilation in particular, developed by Alejandro Portes and his colleagues.

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acquisition of the English language and so on, while elderly migrants joining family in Britain may have different needs.)

A range of assistance measures should be considered. As suggested by the OECD these should include intensive English language teaching, tailor-made programmes of assistance with recruitment, training and recognition of qualifications (or fast-track enrolment and training on equivalent British courses), induction and citizenship programmes, perhaps with longer-term mentoring schemes provided through local and voluntary organizations. Involving a range of partners, including local businesses and universities (who rely heavily on migrants) as well as third-sector organisations, is likely to be an important part of any integration strategy.

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17 March 2017

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CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL

The Bradford Metropolitan District covers an area of approximately 141 square miles, stretching across Airedale, Wharfedale and the Worth Valley as well as Bradford city and the towns of Bingley, Ilkley, Keighley and Shipley. The district's many other settlements include Addingham, Baildon, Burley in Wharfedale, Cullingworth, Denholme, Eastburn, Eccleshill, Haworth, Menston, Oxenhope, Queensbury, Silsden, Steeton and Thornton.

Our communities are diverse with our population rates for the Mixed multiple ethnic groups and for the Indian, Pakistani and Bangladeshi ethnic groups being higher for Bradford than for West Yorkshire and England. 82.8% of the District's population was born in the UK and 17.2% was born elsewhere.

The district has a fast growing and dynamic workforce, a high proportion of self-employment and new business start-ups and, unlike many other UK cities, our young population is growing – nearly a quarter are under 16 years of age.

With a population of over 531,000 it is the fourth largest metropolitan district and has the eighth largest economy in England, worth over £8.7 billion.

Bradford is located at the centre of the UK, with the M606, a spur off the M62 motorway, connecting it to the national motorway network. It has direct rail connections to London and Leeds Bradford Airport is just six miles from the city centre.

We welcome the opportunity to make a submission to this Inquiry as we believe it is timely that the UK's immigration policy and processes should be reconsidered in light of the EU referendum, Government's continuing austerity measures and the ongoing reduction in resources available to support locally required social and public services and provision.

We are supportive of **Principle three** and believe that a reassessment of current government policy to determine if policy changes, especially those involving devolved administrations, might secure more beneficial outcomes for the UK as a whole. However, we also believe that any changes would need to be underpinned within robust parameters with a view to ensuring that policy supported new arrivals in orienting themselves to living in the UK: values, laws and rights, and becoming valued members within integrated communities.

In regard to **Principle four**, we believe that integration should start as soon as possible after arrival in the UK. However, in relation to 'as soon as possible' this should take into account the experience, condition and reason for migrating of the individual. There should also be exemptions within this requirement along with safeguards on time scales to take account of experience once here, for instance, if someone is compromised through illness, accident,

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bereavement or other cause, they may not have the capacity to take part in activities aimed at supporting their integration at that time.

Any programme to support integration should take into account the needs of an individual. It should not be a 'one size fits all' approach.

Our answers to the specific questions posed are:

English language provision

a) How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes be improved?

Our experience suggests that classes in both formal and in trusted community settings are required in order to meet the varied needs of individuals.

People need to understand and accept their specific need for language support before embarking on a course. Courses should be available, tailored and delivered in appropriate settings to ensure these individual needs are met. In Bradford in 2015/16 of 29 individuals who registered on an ESOL course with the aim of supporting them into work, one progressed into paid employment and eight into further education or other courses.

Wrap-around support to enable people to participate in the courses has proved useful in Bradford, such as the offer of childcare and crèches for those women participating in pre-natal ESOL courses.

Course entry levels have sometimes been problematic - with some individuals not having the requirements to be able to participate in ESOL pre-entry classes.

Course content should be bespoke to local areas, focussing on both the rights and responsibilities of the individual as well as providing people with community knowledge that will support their integration and help them to participate in community and civic life.

b) What role, if any, should central and local government, businesses, and service users play in the funding and delivery of these initiatives?

There is a case that where businesses have specifically recruited from outside of the UK, to posts where there is no known skill shortage in the UK, then they should fund any ESOL provision for their staff

However, once people are here, it is important from various aspects that they are able to speak and understand English. To do this they will need access to support.

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Currently local areas do not determine the level of immigration taking place within their boundaries nor any subsequent movement around the UK of people once here. For this reason, Central Government should be the primary funder of provision.

Whilst some service users may be in a position to fund their own provision, without compulsion they may decide not to do so. However, neither does offering free access to provision always encourage participation.

In summary, generally central government should fund provision and local government determine how it is delivered locally.

An exception would be in relation to businesses providing ESOL for their own staff. In this instance, course content would need to be verified by the local authority to ensure it reflected publically provided provision.

c) What are the advantages and disadvantages of college-based ESOL provision and community-based English language programmes, respectively?

Advantages of college based provision

- Generally delivered by more experienced tutors with access to more resources including digital resources - this is significant given the increasing level of online access to public and other services
- Delivered by established providers who can tailor the course to the needs of the participants.
- Established methods for capturing and reporting data.

Disadvantages of college-based provision

- Some people requiring the support are not capable of starting at the Pre-Entry Level 1 (which is the lowest level ESOL currently provided in college settings).
- Can be intimidating to people who have not been educated in formal settings.
- May require travel within an area which the participant, pre- any course, may not have the capability to undertake - due to lack of language skills and lack of independent transport.

Advantages Of community-based provision

- Provision is delivered in a trusted community setting supports the attendance of people who may have less independence at that point in their lives, and less capability to travel within a local area.
- It is less intimidating to people who are not used to being in formal education settings.

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- Builds confidence of potential participants
- Can be tailored to meet pre-entry level 1 ESOL needs
- Enables participants to start to build useful and local social networks

Disadvantages of community-based provision

- Less established methods of data collection and reporting mechanisms
- May not support people to participate in wider community and cross-community/society.
- Could stop people from integrating further as enables them to stay 'close to home'.

Barriers to participation:

d) What are the most common barriers to participation in English language classes?

- To date people have been able to meet their needs in other ways such as via formal interpretation/translation services or informal reliance on family members or members of the community, although this has not supported integration to the wider community and society as a whole.
- Lack of compulsion to attend
- Ability to pay fees, travel and other expenses such as child care
- Availability of courses at suitable venues
- Available provision - demand may outstrip available provision
- Responsibilities - jobs, family life etc.
- Fear that the course might be too advanced for an individual's level.
- Pressure from others in the community/family who are without English as they have shown they can get by.
- Benefits unclear to potential participants.
- Pre-entry requirements too high for some individuals

e) How can these be overcome?

- Make acquiring a specified level of English language skills a requirement for all arrivals with some exemptions.
- Provide free courses with free childcare
- Provide lower level ESOL in community venues for those that are below the pre-entry level 1.
- Make those arriving aware of the benefits to them and their families of having English language skills

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Devolution of immigration policy:

f) To what extent could some of the responsibility for immigration be transferred to devolved governments, metro-regions, Local Enterprise Partnerships, or groups of local authorities?

Whilst there could be some benefits to devolving elements of the immigration system to more local areas, such as related to the needs of local economic growth in relation to skills gaps, there are also major challenges.

Devolution could enable the development of integrated approaches to solving skill shortages where immediate needs could be met whilst planning was undertaken for future workforce requirements.

A major challenge would be the lack of infrastructure to deal with such a policy shift. A lack of consistent devolved government, inconsistent borders for infrastructure support and public service provision also add to this. An example can be seen when considering the healthcare planning footprint (STPs), which is different to the combined authority footprint and city region footprints. So an NHS worker could be entitled to be employed within a specified area that would not mirror the area covered by their employer.

Neither do travel to work patterns sit well within city regions or any other sub-national pattern. So, could a migrant live in a place outside of the area in which they were entitled to work?

g) How might the establishment of a regionally led immigration system impact, positively or negatively, on levels of integration?

This could positively impact on integration as local areas would:

- Be able to specify requirements for skilled/unskilled workers
- Plan any support in advance
- Reduce any negative impact of immigration on public services
- Promote the benefits of the new arrivals to the incumbent population
- This could go some way to reduce the 'fear' of newcomers in some communities.

Negative impacts could be:

- Some local areas refusing to allow immigrants to settle within their boundaries
- Once here, a possible lack of ability to free movement effectively creating a 'second' class of citizen.
- Reducing people's rights to free association
- Not take account of changing individual/family needs

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- Result in a lack of skilled/unskilled workers to support regional growth etc.
- At present people decide themselves where to settle, a regional process could result in local areas being compelled to accommodate set numbers of immigrants without local agreement.

h) How might it impact on the political and public debate on immigration issues?

Devolving the system to a regional level would provide a local focus for debate on issues around immigration not only in the political structures but also amongst the public. Whilst there are positive aspects to this such as the promotion and shared understanding and agreement for of the reasons why a region is welcoming a number of immigrants, it could also provide multiple platforms from which anti-immigration sentiment could be launched and possibly increase incidents of hate crime.

We have experience in Bradford of when 'hate comes to town' with a number of English Defence League and other far-right groups demonstrations. The potential for physical damage to the streets of Bradford and injury to residents, visitors, and public servants on the day of any such events is immense, the damage to Bradford's reputation with investors is also immense, the replaying of events by the media adds to this damage. Whilst we are proud that our people and communities come together as one on the run up to and from these events, the potential for damage to community cohesion is also immense. Reducing resources for public services also means that spending to protect Bradford and its people in this way uses up our valuable resources in a negative manner.

Making decisions at a more local level could provide an ongoing local focus for such demonstrations- meaning that a higher proportion of local resources would be required to ensure public safety.

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CONVENTION OF SCOTTISH LOCAL AUTHORITIES (COSLA)

Introduction

1. Convention of Scottish Local Authorities (COSLA) is the representative voice of Local Government in Scotland and works with member councils to deliver services to local communities. COSLA also acts as the employers' organisation on behalf of Scottish Local Authorities.
2. COSLA Migration, Population and Diversity (MPD) Team works specifically on migration issues. We work with a range of key partners including the Home Office, the Scottish Government and stakeholders from the public, private and voluntary sector to ensure that migrants are welcomed and integrated into Scotland and that the demographic needs of the country are met.
3. As outlined in our response to Stage One of the APPG inquiry, COSLA has made the case that a reduction in migration could adversely impact on Scotland's local authorities. We have particular concerns around the implications for counteracting our demographic challenges and the impact on our workforce and local economy. COSLA supports the need for a flexible immigration system that considers local area requirements. In this respect, COSLA supports principle three of the six guiding principles set out in the APPG interim report - Government must reassess its current 'one size fits all' approach to immigration.

A regionally led immigration system – the benefits

4. COSLA has consistently argued for flexibility within the immigration system in order to meet the demographic and labour market requirements of Scotland. We also argue that flexibility should not stop at the national level; the system must also be able to accommodate Scottish local authority areas and their specific needs. COSLA also acknowledge the wider benefits that migrants can bring to the local community.

Help to counteract our demographic challenges

5. In COSLA's submission to Stage One of the inquiry, we outlined the demographic challenges Scotland faces in terms of an ageing population and in some local authority areas of Scotland a significantly decreasing population. We used National Records of Scotland population projections data to evidence these demographic challenges.
6. However, the population projections do not take into account future policy changes, so the current projections do not consider the possible implications of Brexit. National

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Records of Scotland (NRS) has recently generated projections using the scenario of no EU migration in the future. There would be a significant impact on the child and working-age populations, and there would be greater impact on Scotland on the rest of the UK. The projected changes with zero future EU migration between 2014-2039 are: the number of children would change from the current projection of a 1% increase to a 5% decrease, whereas the UK with zero future EU migration would change from the current 9% increase to 3% increase. The Scottish working age population would change from a projected 1% increase to a 3% decrease – the UK would move from a projected 11% increase to 6% increase. In Scotland, the number of pensioners would stay the same at 28% increase and the UK would decrease by 1% from the current projected 33% increase to 32%. The total population for Scotland would increase 3% in comparison to the current projected 7%. This highlights a significant ageing population challenge for all the UK but with particularly strong implications for Scotland.

Workforce - Teachers

7. In COSLA's stage 1 response, we argued that shortages in teachers and social care could be exacerbated by Brexit and a restrictive approach to immigration. To get a full grasp of the potential implications on teachers, COSLA approached the General Teaching Council for Scotland (GTCS) for a figure on how many teachers in Scotland are EU nationals. According to GTCS records, there are currently 670 teachers qualified in other EU/EEA Member States registered with them (approximately 1.3% of total registrations). This is in stark comparison to the very small numbers of teachers recruited from outwith the EEA (see below).
8. Many local authorities have highlighted the fairly polarised make up of their teacher workforce where a significantly high proportion of teachers are at either end of the working age population.
9. Also, difficulties recruiting to remote and rural locations in Scotland are widely recognised. Although shortages are acknowledged as a national issue, many Scottish local authorities highlight clear challenges in particular areas. In some areas, such as the North East, the higher cost of living creates issue with teacher recruitment. The cost of housing is an important factor in the overall cost of living and in some parts of the north east in particular, a lack of affordable housing to buy or rent deters people from moving there if they know that their salary would go further in other parts of the country.

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Workforce – Social Work Services

10. Regarding the social work services, COSLA contacted the Scottish Social Services Council (SSSC) for information on EEA and non-EEA nationals working in the sector. Drawing from data from the National Records of Scotland 2011 census, it was identified that there were almost 185,000 respondents who identified themselves as employed in in the social work sector. It found that 2.8% of those working in social services were born in an EEA country and 4.7% were born in a non-EEA country.
11. The occupational analysis of respondents found just over 150,000 respondents working in specifically social services occupations. Table 1 presents the findings. The occupation with the highest percentage of EEA and non-EEA migrants was Senior care workers.

Table 1: 2011 Scottish census respondents by social service occupation and whether UK, EEA or non-EEA born

	% UK born	% EEA migrant	% non-EEA migrant	All migrant
Social services managers and directors	94.9	1.9	3.2	5.1
Residential, day and domiciliary care managers and proprietors	94.5	2.2	3.4	5.5
Social workers	93.0	2.6	4.3	7.0
Welfare Professionals (not elsewhere classified)	95.0	2.0	3.0	5.0
Youth community workers	93.9	2.4	3.7	6.1
Child and early years officers	96.0	1.4	2.6	4.0
Welfare housing associate professionals (not elsewhere classified)	93.5	2.4	4.1	6.5
Nursery nurses and assistants	96.1	1.8	2.1	3.9
Childminders and related occupations	92.8	3.8	3.4	7.2
Houseparents and residential wardens	95.7	2.3	2.0	4.3
Care workers and home carers	91.6	3.2	5.2	8.4
Senior care workers	87.9	2.8	9.3	12.1
Care escorts	97.0	1.3	1.7	3.0
Total	92.8	2.8	4.4	7.2

Source: National Records of Scotland, 2011 census

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12. The social work sector, particularly social care, suffer from similar recruitment issues as teachers, e.g. in rural areas and regional variation, an ageing workforce, and high vacancy level (according to Scottish Care figures there is a 28% vacancy level in social care nursing in Scotland).

Reverse the limitations of the current Points Based System (PBS) immigration system

13. COSLA has consistently voiced concerns about a system in which the aim is to reduce net migration, when we are looking to address the needs of the Scottish economy and our ageing population, encourage people to move to Scotland, and aid integration.
14. Teacher recruitment is an example of how the current immigration system has impacted negatively on local authorities. As mentioned above, Scottish local authorities rely far less on teachers from outwith the EEA: the number of teachers from outwith the EEA using the current UK immigration system in Scotland were a total of 12 in 2014 and 7 in 2015¹³. This can be down to the relatively straight forward process of employing from the rest of the EU/EEA, in comparison to bringing teachers from outside the EEA. Scottish local authorities have cited the key barriers in the recruitment of non-EEA teachers were due to an inflexible and cumbersome immigration process. For example, the length of the visa process impacts on the ability to fill positions in time for the start of term. Also, some local authorities have mentioned that their applications for Certificate of Sponsorship were being rejected. The reason given was that applications were not scoring enough points, but there was a feeling from some other higher salaried/qualified jobs were being prioritised instead.
15. Also, the health and social care sector has been effectively removed from the Shortage Occupation List (SOL) through increasing salary and qualification thresholds.

¹³ COSLA obtained these figures from the MAC.

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Acknowledge and harness the integration benefits Freedom of Movement of Workers has generated

16. The above acknowledges that labour market is a crucial factor in an immigration system. However, the current PBS immigration system's focus on the needs of the primarily highly skilled labour market ignores the wider contribution migrants bring in terms of demographic profiles (as discussed above) and the benefits that they bring to communities. If we are looking at an immigration system for EU nationals, it must not be purely focused on the principle that people are only needed to fill temporary workforce shortages and gaps.
17. The importance of family migration must also be acknowledged in terms of integration and settlement, which encourages people to settle, make Scotland their home, and contribute to their communities. The relative ease in which EEA nationals can negotiate family migration cannot be lost through Brexit.
18. A number of Scottish local authorities are working with Glasgow University's SSAMIS project (2013-2017). The project explores experiences of migration and settlement amongst migrants from Central and Eastern Europe living in Scotland. The SSAMIS interim findings emphasise how family can be central to the process of migration. This can be in terms of having family members already in Scotland encourages migration, eases the process of integration, finding employment and accommodation, and generally understanding the system. The findings also found that children were a key factor for influencing settlement and a feeling of being 'rooted' in Scotland.¹⁴ There is a case for a more light-touch approach to family migration than the current system for non-EEA migrants.
19. There is also real concern that social rights that are available through freedom of movement will be undermined. COSLA argue an immigration system must encompass social and integration policies, including family migration, settlement, access to education and healthcare.

¹⁴ SSAMIS Social Support and Migration in Scotland: http://www.gla.ac.uk/media/media_500297_en.pdf

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Regional led Immigration system –potential positive impact on integration

20. There is merit in thinking a regional immigration system could help us to move from the largely negative and defensive debate to allow for a more positive and progressive discussion. This could be done by reconfiguring the debate from the UK stance of migration is too high and its aim to be reduce migration to the tens of thousands, to the Scottish local government and Scottish Government view of migration as an important driver for economic growth and demographic change.
21. COSLA acknowledges leadership is key to promoting the positive impact of migration and encouraging a more balanced debate. COSLA's stage 1 response highlighted how Scottish local authorities have shown their support and value of migrants after the Brexit vote. COSLA has produced a briefing note on migration for elected members. This provides baseline factual information on migration and is designed to assist elected members in dealing with issues that are raised regarding perceived and actual impacts in their localities.¹⁵
22. COSLA's Migration Policy Toolkit also highlights the central role local politicians play in shaping attitudes to migration, by communicating positive messages.¹⁶ The toolkit highlights the importance of knowing about:
- The migrants in their communities;
 - The particular issues that migrants face;
 - Their rights and entitlements;
 - The positive contribution they bring to the area;
 - The pressure that can be placed on services; and,
 - The impacts on communities.
23. The toolkit also emphasises the importance of disentangling concerns about unemployment, inequality and declining social cohesion from immigration. It is important that politicians are briefed on issues relating to housing, employment and benefits, as there can be concern about competition.

¹⁵ COSLA & IS Elected Member Briefing Note on Migration:

<http://www.migrationscotland.org.uk/migration-information/elected-member-briefing>

¹⁶ COSLA Migration Toolkit: <http://www.migrationscotland.org.uk/migration-toolkit/strategic-approaches-migration/3-2-ensuring-leadership>

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Conclusion

24. It is critical that Scottish Local Government's needs are recognised and reflected in any potential immigration systems that are developed because of Brexit. A future immigration system, including a regionally led immigration system, must consider the limitations of the PBS and acknowledge the benefits freedom of movement has generated. Also, there is a real need to move the debate from the largely negative to a more balanced discussion that gives equal space to promoting the positive benefits of migration.

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EAST LONDON ADVANCED TECHNOLOGY TRAINING (ELATT)

Brief description

ELATT is an adult education charity based in Hackney and supporting people pan-London. We are a learning community helping people from all backgrounds to improve their life. ELATT has been delivering ESOL with Community involvement projects for the past 10 years and have established a model of supporting migrants and refugees to learn English with, and through civic participation. Our projects are researched and evaluated for impact. ELATT is an Ofsted Grade 1 institution and overall Further Education provider of the year 2016-17. We have delivered integration and women empowerment projects for the Home Office (inc EIF and ERF), London Councils, DCLG and various trusts and foundations.

Our responses to the questions:

1. *English language provision*

c) What are the advantages and disadvantages of college-based ESOL provision and community-based English language programmes, respectively?

Based on our experience we believe that the majority of current ESOL provision in formal college environments lack sufficient requirement for participants to engage in real-world activities and thus limit experiences participants may have of civic participation (for example through community involvement). Courses are qualifications-driven as this is the government's model of payment, and hours to teach English are limited based on college finance department guidelines. The guided learning hours (GLH) recommended by the awarding bodies may not cater for certain groups of harder-to-reach students. In addition to being qualification-led, college ESOL provision is also likely to be employability-led rather than integration as an end in itself. Many parents for example need ESOL for everyday life or to help with their child's education. We also find that students who are more likely to feel confident to go to join a college course are less likely to be in the 'hard-to-reach' bracket. In some colleges, students can stay with the college for years progressing in language level, but not progressing in social interactions/ community involvement or job attainment at the same time, as the focus is classroom learning.

Community-based provision has the benefit of potentially being client/participant-led: the design of the projects could be more responsive, including more activity-based approaches that aim to support a whole-person's issues. Therefore, it could motivate and support a migrant/refugee to get involved in their community as a functional step towards accessing services or supporting children better. The English language learning should then support the needs that participants have in their lives. However, there is a large diversity of community-based provision and also many inconsistencies in quality of provision, especially in teaching of

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English language by untrained volunteers. Some programmes also seem to be more appropriate as complementary programmes to formal college learning rather than to replace existing classroom learning. Although it is preferable to be responsive to community needs, there should also be a level of consistency of quality of English language teaching, underpinned by an understanding of current language learning theories and models and informed by appropriate knowledge of Equality and Diversity as well as Safeguarding.

a) How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes be improved?

Ideally it would be best to have a more joined-up approach between both models. For example, encouraging college students to join existing Conversation Clubs or volunteer in leading the club (where a student has improved), and recruiting from existing Conversation Clubs to move learners into formal learning courses – this model ensures progression is at the heart of all delivery models. Alternatively, both types of provision can learn from each other- so community-based provision can use qualified teachers and add sessions to the existing activities and colleges and formal FE institutions can start offering these activities to their students as part of their learning curriculum.

Additionally, where there are a number of different volunteer-led programmes, developmental support for volunteers and monitoring of quality and impact should be carried out to ensure that the programmes are robust and support full development of the person's skills and meet their needs. Although the programmes are not formal 'teaching programmes', volunteers are leading participants in language acquisition and development, in some cases doing 'light teaching', and the projects paid for by the government: therefore they should also be inspected for quality of learning provision as learning and development is supposed to be taking place.

Additionally, research has shown that the role of the settled or 'host' community is usually not acknowledged when looking at language and integration initiatives. The Social Integration Commission report 2014 (How Integrated is Modern Britain) showed that white British communities were the most segregated communities even when adjusting for population sizes, having on average 50% fewer interactions with people of different ethnicities to them. One way of improving the programmes would be to encourage involvement by 'settled' or 'host' communities to participate in activities with migrants.

b) What role, if any, should central and local government, businesses, and service users play in the funding and delivery of these initiatives?

The LEPs, central and local government should definitely play a responsible role in the planning and funding of these initiatives as the impact of low levels of English language and civic participation will be detrimental to households' socio-economic status, affecting other areas of business potentially causing drains to other services such as schools and health as well as

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negative impact on integration and cohesion. (See for example HERU Policy Brief, August 2016; BIS Research paper 267, February 2016; Casey review, December 2016).

There is already a large community and voluntary sector set-up to complement existing formal adult skills providers and therefore we feel that the role of LEP and central and local government should be in grant-administering rather than direct delivery or wholesale commissioning of this type of provision. In order to reach the most disadvantaged and/or hard-to-reach people, community-led providers with in-depth knowledge of how to engage and where to outreach are crucial. Otherwise delivery is likely to be to people who are already motivated and lacking in barriers to learning, thus not reaching the participants that the work intended to.

2. *Barriers to participation*

<i>a) What are the most common barriers to participation in English language classes?</i>	<i>b) How can these be overcome?</i>
- Lack of knowledge of services and support available for free	- Ensuring that people who are settling (e.g. people on spouse visas) are given a list of places they can go to take part in a programme of learning and activities
- Time constraints	- Part-time classes worked around childcare/care/work responsibilities
- Caring responsibilities e.g. childcare or older persons	- Make sure that provision for funding childcare is included in the programme to encourage access for all
- Distance to travel for classes e.g. in West London where there are fewer college campuses	- Have delivery in community-based centres, preferably by/in partnership with existing community groups
- Low self-esteem, fear or shyness to attend learning especially if the person has not had a positive experience of learning or has not been in learning for many years	- Have delivery in community-based centres, preferably by/in partnership with existing community groups; also using outreach methods that are bite-sized to introduce to the idea or learning in a sensitive and staged manner, without being patronising or condescending

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- Culturally-influenced barriers to learning including perceived roles and priorities of people in the family e.g. men should work and women should look after children	- Delivery by or in partnership with existing community groups can support the change in perceptions. Additionally, a requirement for people who are new migrants to attend English courses could help engage people who would not engage.
- Financial barriers	- Free courses, hardship support for those in real need to ensure retention on the programme and successful completion
- Lack of opportunity to practice to gain confidence	- Encouraging 'settled' community groups to also take some responsibility for helping migrants
- Fear of racism and xenophobia limiting migrants' ability to practice English that they have learnt- migrants do not see themselves improving, therefore lose motivation to continue learning	- Encouraging 'settled' community groups to also take some responsibility for helping migrants

3. ***Devolution of immigration policy***

a) To what extent could some of the responsibility for immigration be transferred to devolved governments, metro-regions, Local Enterprise Partnerships, or groups of local authorities?

ELATT believes that whilst central government should retain overall administrative control over national immigration, there should be a thought-through and effective system for regional and local needs to be assessed and met. For example, with London experiencing a major skills shortage (Factsheet: Demand for Digital specialists, Tech Partnership, July 2016), there is a clear need for London to be able to retain and continue to hire overseas labour to meet shortages in crucial economic sectors, and our position is that these workers need to integrate. Similarly in parts of England that rely heavily on foreign labour for farming, the region should be able to feedback on local and regional needs. Language and integration again play an important part in this.

b) How might the establishment of a regionally led immigration system impact, positively or negatively, on levels of integration?

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ELATT is unable to comment on this

c) How might it impact on the political and public debate on immigration issues?

Evidence of a more responsive and thought-through plan for immigration, that is needs-based at local and regional level may restore faith of settled population that immigration is a necessity for a number of sectors in our country. ELATT is committed to supporting the tech sector and future digital needs of London and the UK by developing talent to fill the current skills shortage and jobs in the future. ELATT considers talent could be people from other countries or people already settled in the UK and we do not discriminate where someone has the right to live and work in the UK. Current research shows that the UK and London especially does not have enough trained people from the settled community to fill these shortages (Insights: Lifelong learning and international talent critical to future of digital skills, TechUK, 1st March 2017).

4. Drawing on international examples

a) Are there any international examples of successful regionally-led immigration systems which UK policymakers might draw upon?

There are many different models used to support integration internationally. ELATT has met with a number of international partners and can give a couple of examples (in b. below). ELATT cannot comment on immigration systems.

b) How has the system in question affected migrant settlement patterns and levels of migrant integration and community cohesion?

The Danish model has government-funded programmes: language, separate citizenship courses which include employability and work-placement programmes, which all companies are incentivised to participate in and offer opportunities to refugees and migrants who are applying for permanent residency. Although the system for assessment is rigid, and ELATT questions the suitability of exams as method of assessment, the high degree of support and compulsion by business to give migrants opportunities to participate in work placement and social situations, means that there is more successful integration.

In Germany and Sweden, asylum-seekers are allowed to gain employment and switch to becoming work migrants to ensure that they are not a drain on the government (Towards a Whole-of-Society Approach to Receiving and Settling Newcomers in Europe, Migration Policy Institute, November 2016). Based on our own experience, when refugees spend a long time in the asylum process with no opportunity to learn English or skills, or lack the opportunity to volunteer to upskill themselves or keep their skills relevant, they tend to fall into worklessness, which continues even after they have been granted refugee status. If social integration does not happen with settled communities in their time as an asylum-seeker, by the time they are

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refugees they are already used to isolation and segregation and this has a negative impact on their ability to get jobs, support children at school and get on in life (ELATT research, 2014).

There are many more insights into approaches that work in other countries in the Migration Policy Institute Report (November 2016) and we recommend it to the group.

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EDUCATION SCOTLAND

Dear Chair,

Submission to the All Party Parliamentary Group for Social Integration

Education Scotland is pleased to submit evidence to the Inquiry for Social Integration. The submission focusses on Principle four - Integration of Immigrants. Education Scotland is Scotland's national quality and improvement agency for learning and teaching. It currently holds responsibility for English for Speakers of Other Languages (ESOL) policy for Scotland. The evidence given in the submission is based on information gathered from a range of sources including Education Scotland's aspect review on ESOL Provision in Colleges (2014) and funding reports from Community Planning Partnerships (2015-16).

How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes be improved?

The Scottish Government's position is stated in the national ESOL Strategy for Scotland - *Welcoming Our Learners: Scotland's ESOL Strategy 2015-2020*. It can be summarised as follows:

Scotland's ESOL Strategy aims to ensure that there is high quality learning and teaching of ESOL in Scotland for those who wish to improve their language skills. The Scottish Government is committed to ensuring that all residents in Scotland whose first language is not English can contribute to Scottish society and the economy. Having English language skills is key to enabling full participation in Scottish life, supporting integration, and giving people a democratic voice. *Welcoming Our Learners, Scotland's ESOL Strategy 2015-2020*, provides the strategic direction to ensure we continue to support high quality learning and teaching of English language in Scotland.

It can be seen from funding reports that most partner providers in local authority areas work well together to offer provision in different places, at different levels and for different purposes in order to meet the needs of learners. Partner providers include colleges and Community Learning and Development partners including third sector organisations.

Community-based programmes are often successful in their outcomes. Partnerships delivering these programmes are now improving how they report on the wider impact that ESOL learning has had on learners.

There is a need to share and promote successes so that other partnership areas can learn from or replicate successful models and/or processes. Education Scotland will be working with partner providers to highlight successful models of practice and promote these through the National Improvement Hub. By promoting successful practice at national level, this will give

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providers a means of accessing information that will help inform and improve their own practice.

What role, if any, should central and local government, businesses, and service users play in the funding and delivery of these initiatives?

As Education is devolved to Scotland, Education Scotland has a role in supporting and quality assuring the delivery of learning and teaching in ESOL. As mentioned before, it recognises the strengths of the partners involved in delivering programmes and is aware of where the challenges are and how we plan to address these.

In terms of funding, ESOL provision is currently funded through the Scottish Funding Council. In 2016-2017, an additional £1.45m was given to Community Planning Partnerships to support the delivery of ESOL. This supports the delivery of programmes in colleges and through Community Learning and Development services including third sector organisations. Some third sector organisations also receive funding from the Scottish Government to support initiatives around language learning and integration. For example, in support of refugee resettlement in Scotland, the Scottish Government is providing £85,885 to fund the Sharing Lives and Languages English language community learning pilot. The pilot was developed by a number of partners and is a peer education approach to English language learning to complement formal ESOL classes and bring together refugees and the local community.

In addition, there is a role for businesses which employ migrant workers in large cohorts. Businesses should be investing in these members of staff by supporting them in their language development. This is addressed by providers promoting workplace ESOL courses which can have a significant impact on people already in work. Reports show that it can help workers to become more effective in the workplace and the marked increase in confidence in using the language and increased levels of English has meant that interaction in customer facing roles has improved.

What are the advantages and disadvantages of college-based ESOL provision and community-based English language programmes, respectively?

The following is a summary from Education Scotland's Aspect Review of ESOL Provision in Colleges which was published in June 2014.

Strengths:

Colleges deliver a range of programmes to suit learners' needs and circumstances reflecting principles of inclusion, participation and progress which are the key principles of provision promoted in Scotland's national ESOL strategy. Colleges also effectively assess language levels through initial assessment processes ensuring that learners are appropriately placed in

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provision. As a result the majority of learners achieve their qualifications and progress to further learning or employment. Within full-time ESOL programmes, the learner success rate is significantly higher than the national sector performance level for full-time further education. Staff in colleges are appropriately qualified and are thought highly of by learners. There is a strong self-evaluative approach in colleges that involves learners giving feedback on a regular basis.

Areas for improvement:

More consistency is needed in the use of terminology related to language levels to help understand provision and progression routes. Colleges should consider how more bespoke programmes could be credit rated to help support learners in their progression. There is limited provision at lower levels while many learners on part-time courses have limited engagement with the wider college. In addition to this, the success rate of those on part-time provision is lower than the success rate of those on full-time provision. Colleges have limited engagement with employers who employ large numbers of non-English speakers. Colleges could use their learner tracking systems to help inform planning and selection procedures. The needs of ESOL learners with specific learning difficulties could be better met while the success rates of ESOL learners from non-white ethnic backgrounds are lower than the success rates of those from white European backgrounds. A few colleges are also unaware of the ESOL provision offered by other bodies.

Education Scotland is and will be addressing these areas for improvement through the implementation of the national ESOL strategy which is currently focussing on specific actions to support the promotion of equality and diversity and to promote the wider impact of language learning.

The following information is from an analysis of ESOL funding reports from 2015-16 which were submitted to the Scottish Funding Council by Community Planning Partnerships:

Community based provision can help learners to overcome a number of barriers including accessing provision locally through classes being run in local community centres. This is especially the case in large geographic areas where pockets of learners can be found across one local authority area. Community based provision can be offered with a focus on helping adult learners return to learning (particularly those who are literacies learners or at beginner level) and by doing this in neutral and accessible locations such as libraries and community centres.

Non-accredited ESOL in the community can have a capacity-building focus. Providers delivering in this context have a strong awareness of the need to help reduce isolation of some learners and equip them with language skills to help them become more independent, access local services and understand what services are available. As providers focus on these aspects of

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learners' lives, it helps to increase learners' understanding of life in Scotland as well as go some way towards their integration in local communities.

Scotland takes a learner-centred approach and recognises the importance of providing people with opportunities to improve language skills for social and economic integration. While this approach may result in limited capacity to deliver, providers work continuously to support the language learning goals of learners and fully adopt the learner-centred approach. Providers recognise that learners come with skills and experience that with the right language support can be utilised to the benefit of themselves and the wider community.

Barriers to Participation

What are the most common barriers to participation in English language classes?

One of the most common barriers to participation is not being able to access classes due to limited provision or due to the absence of a particular type of provision or lack of capacity to address a particular need.

An example of this is the gap in language provision for specific professions to enable people into jobs they may be skilled and qualified in from their home country. This type of provision is different to general provision which may only focus on everyday language and grammar. This is a different perspective to the general understanding of employability skills where providers deliver ESOL and employability programmes with a focus on:

- CV writing.
- Covering letters.
- Understanding the language in application forms.
- Filling in application forms.
- Listening and speaking skills for job interviews - being able to talk about skills and qualifications.
- Project related learning involving active engagement with local employers.
- Partnership working between providers and other agencies to offer volunteer opportunities to learners.
- Digital literacy skills - using the internet and social media to apply for and find work.
- Understanding the employment and job search process in Scotland.

Partner providers report successful outcomes in delivering these kinds of programmes including improvement in language skills and being able to demonstrate this to employers, the achievement of recognised qualifications - enabling progression onto further vocational qualifications, gaining work experience through volunteering, gaining employment, retaining employment and access to a wider range of job opportunities.

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In 2016, the Scottish Government and Education Scotland worked with the Department of Work and Pensions to explore the possibility of supporting the implementation of their English Language Requirements policy for job seeking claimants. This policy requires claimants, who are identified as needing to improve their English language, to attend training in order to show they are taking steps to improve their English for employment and to satisfy the conditions of their benefit claim. Scottish Ministers expressed their concerns about the policy and highlighted issues including the potential barrier for women with children in attending English language training should there be lack of appropriate childcare services and the connection to sanctions should claimants be deemed as not fulfilling the conditions of their benefit claim.

Another example is the lack of capacity to deliver to meet high levels of demand in more urban areas where demand for English courses is greater. There is also a lack of capacity to support specific needs. This can be heightened in areas where learners are more dispersed in large, rural local authority areas but the staffing and resources available are limited.

Pressure is also added to providers supporting people who need to improve their language skills for citizenship or indefinite leave to remain. This support can be time consuming and costly. There are only two test centres in Scotland and two approved test providers.

How can these be overcome?

Scotland's national ESOL Strategy recognises that English language skills can act as a key facilitator to integration and there are currently initiatives underway such as the aforementioned pilot to support refugee integration.

Education Scotland along with key partners continues to monitor the level of unmet demand and to improve systems of capturing this data which will enable providers to target their provision more efficiently.

It is recognised that providers individually would not have the capacity to address specific language needs of ESOL learners who are already qualified and experienced a particular profession. This would require a lot of time and resource by the provider that would be disproportionate to the demand. Targeted investment for particular professions has already been made by the Scottish Government such as the recent investment made for the Refugee Doctors Programme: <http://news.gov.scot/news/refugee-doctors-programme>

Education Scotland hopes to learn from this initiative and to explore how this model could be drawn on to address the access to employment for other skilled professionals where there is a language need identified. Education Scotland is actively involved in the implementation of Scottish Government's refugee integration strategy.

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In 2013, the *New Scots: Integrating Refugees in Scotland's Communities* strategy was developed as a three year strategy, by the Scottish Government, COSLA and the Scottish Refugee Council; working with many organisations across all sectors supporting refugees. New Scots established a framework to coordinate the efforts of all organisations involved in supporting refugees in Scotland. The vision of New Scots is "For a Scotland where refugees are able to build a new life from the day they arrive and to realise their full potential with the support of mainstream services; and where they become active members of our communities with strong social relationships. Education and Employability and Welfare Rights have been two of the thematic focuses for New Scots work. The current strategy runs to the end of March 2017. A new strategy will be developed, building on the experience and achievements of New Scots, to continue to support refugees to be active members of our communities. New Scots partners will continue to work together and are planning engagement to take place over the summer of 2017. The new strategy is likely to include continued focus on supporting refugees employability and English language skills as these are often identified as key priorities for refugees as they seek to rebuild their lives and contribute in their new community.

Consideration should be given to how people can evidence their improvement in learning English for the purposes of citizenship or indefinite leave to remain in the context of how accredited ESOL provision is delivered in Scotland which includes the use of the Scottish Qualifications Authority ESOL qualifications. Funding reports received from Community Planning Partnerships for 2015-2016 have shown the impact of the changes to evidencing language levels including the cost involved in taking one of the approved tests and the time and travel involved to take the test at one of the only two approved test centres in Scotland. Any revision to the processes for citizenship including the language requirements should take account of the Scottish education system in which English language learning sits.

The Scottish Government is committed to ensuring that there is access to appropriate ESOL provision for those who seek it and invests in this through the funding it gives to providers. It will continue to support the delivery of ESOL in the context that has been described above where people are supported in their English language learning for the purposes of social and economic integration and to enable people to fully contribute to and participate in Scottish society.

Yours faithfully



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ENGLISH FOR ACTION (EFA LONDON)

This response is based on the collective experience of our teachers and learners and some primary research. We have been following the work of the APPG on Social Integration with interest. One of our teachers and one of our students attended the session in the House of Commons on Feb 27th. We felt that, although the evidence given by the panelists was really interesting, it was a shame that the voice(s) of ESOL students was absent and this response goes some way to addressing that. We have covered the topic in several of our classes and collected students' responses for a number of weeks. Also, in 2013 we published a report called "[Whose Integration?](#)", which addresses many of the themes in the APPG's Interim Report. In total, over 100 of our students and at least five of our ESOL teachers have contributed to this response.

What is English for Action (EFA London)?

English for Action (EFA) is a third sector ESOL provider. Our classes are free and based in community locations like schools, churches, mosques and children's centres. We intentionally set up classes in low-income areas and areas where there are relatively large numbers of people who speak English as a second (or additional) language. Most of our classes take place at primary schools and most are attended predominantly by women (often mothers of children at primary schools). We have learners from all corners of the globe and with a variety of immigration statuses, including refugees and asylum seekers. Last term, one of our classes in Streatham had 16 different countries of origin out of 17 students.

We currently run classes in 23 different community locations around London reaching approximately 400 people a week. We have groups in seven London boroughs the majority of which are in south London. We have a staff team of 12 workers, 10 of whom teach. Although we are a charity, we do not hold the third sector up as being superior in any way to FE and local authority provision. In fact we attempt to reach the same high standards of professionalism and quality. All our teachers are paid, qualified and experienced and we have high demands of them in terms of continued professional development. We currently have two contracts with local authorities, which encourages us to conform to the high standards of their in-house provision, but the majority of our funding comes from trusts and foundations.

We have three strong principles that guide our work. We want ESOL to be accessible, participatory and empowering. We make the classes **accessible** by locating them in community venues, providing onsite childcare where necessary and by making them free to everyone. The teaching approach is **participatory**, and students have the opportunity to set the agenda in terms of content of courses. Thirdly, we run our classes to be **empowering**. This means that as well as encouraging students to share the challenges they face, we also support them to take practical action to address them.

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Whose Integration?

EFA has two charitable objects:

- 1 -The advancement of education in the field of ESOL
- 2 - Developing the capacity of migrant communities to participate more fully in society

As such, our work is absolutely about integration but we have never particularly identified with the term. Perhaps that's because we associated it with assimilationist ideas and/or a stick with which to beat migrants. We do talk about participation however, both inside the classroom (participatory pedagogy) and outside (civic participation).

This ambivalence towards the theme of "integration" and perhaps also an unwillingness to abandon it entirely, led us to explore the term for a research project funded by the British Council. We called the project "*Whose Integration?*", as we sought to explore what it meant to our ESOL students.

We felt that perhaps there is an overemphasis on national identity and national culture when we talk about integration, when other identities and local contexts seem equally or more important to many people. Our students were generally just as concerned with integration into their 'own' linguistic, ethnic or religious communities as they were about integration into the UK, which had less meaning. Barriers to participating on an equal basis with others in the local community often related to gender discrimination and poverty.

We decided that integration wasn't just a two-way street, as many people suggest. From the perspective of our students (and teachers), it was more of a "spaghetti junction". The extent to which people felt "integrated" ebbed and flowed and what they were integrating into was constantly changing anyway. No-one, teachers or students, could successfully pin down what "British culture" was. Traditions came from all over the world and new ones continually emerge. Last month for example, our Polish students came into class with donuts for all of the class and teachers at the school too. Apparently it was "Fat Thursday" (a bit like Shrove Tuesday), a tradition that none of the other students or teachers had heard of before. It seems like an excellent addition to Pancake Day!

It is perhaps more useful to think about sites of integration: the school gates, the church/mosque, work, the bus and most importantly the ESOL class, to which we now turn.

English language provision

a) How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes be improved?

Firstly, provision needs to be drastically increased. We cannot emphasise this enough.

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Our classes are consistently full and we do very little in the way of advertising to recruit students. When we hold information sessions about ESOL in our host communities (most often primary schools) there are regularly 20-30 people in attendance and that is just among parents at the school.

Some of our students did also identify some problems with the quality too however. They recommended improved “support or guidance at the beginning of courses”. One student recommended longer and more holistic initial assessments. These could better identify the students’ motivations, prior experiences, hopes for the future and support needs.

b) What role, if any, should central and local government, businesses, and service users play in the funding and delivery of these initiatives?

We would advocate an increase in funding from central government. Local government’s budgets are already squeezed, and without an increase in their funding from central government, ESOL classes would have to be provided at the expense of other essential services.

Funding for ESOL should be considered a necessary investment from the government. A recent report by Refugee Action called “[Let Refugees Learn](#)” suggested that the cost of a student’s ESOL courses is repaid within eight months of them working, assuming they earn an average salary. If a student is already working ESOL can make them more productive and/or increase their earning capacity. ESOL makes other public services more effective and economical, especially health services.

Some people would say why should the public foot the bill and not the students themselves. The reality is that most ESOL students cannot pay because they are either on low salaries or are out of work. Moreover the positive impact of students’ improved English benefits society as a whole.

Local government should perhaps play a coordinating role. Some councils do this very well already. The work is the [ESOL advice service in Hackney](#) is exemplary. They maintain an updated list of provision and regularly assess students and advise them to join an appropriate class.

Our students identified work both as a barrier and something that can help. We would like to see businesses putting more into ESOL given the obvious self-interest in many cases. One employer, a cleaning company at a London University, once allowed their employees to attend our ESOL class in paid time (one hour paid time and one hour in free time) and provided space on site for the class. This is extremely rare. We would like to see the government reward businesses for supporting their employees’ learning in this way.

c) What are the advantages and disadvantages of college-based ESOL provision and community-based English language programmes, respectively?

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In many ways this is a false dichotomy. Many colleges for example South Thames College in Wandsworth, deliver community-based courses in children's centres and schools etc. Some community providers (both charities and local authorities) have very good progression routes for their students to move on to college courses.

The advantages of college-based courses are the facilities and the proximity of colleagues to share best practice and support one another. There may well be better provision of teaching assistants, embedded learning because of the variety of subject specialists on-site and SEN (Special Educational Needs) support.

However, the nearest college may be far from where students live. As a result of these wide catchments, college students may also live far away from each other, making it harder for students to build mutually supportive and useful relationships. Community locations are usually more embedded in geographical communities, closer to where students live. In our experience they can connect students to the host communities which can be really useful in terms of getting information about the local community, forming new relationships and access to power (for example, getting support from a school head-teacher for a housing application).

Where classes are provided in the school attended by ESOL learners' children, attending class might make it more likely that learners get involved in the life of the school, speak to their children's teacher or come to parents' events. Therefore community provision, in the right institutions, can encourage wider participation in the community.

Some community provision can be less professional and lower in quality than college courses. EFA's policy is very strict: all classes must be delivered by paid, qualified teacher. Not all organisations share this stance however and as a result the quality can be patchy. Several of our students told us about the difficulty of being in a class that is too hard: "we need lessons from the beginning". Mixed level classes are more typical of community-based provision than college-based, where learners are generally placed in a class with students of the same level.

Barriers to participation

a) What are the most common barriers to participation in English language classes?

b) How can these be overcome?

In order to examine the barriers to participation and what we can be done to overcome them we asked these questions to students. We used the metaphor of a river and asked students to create a river of their English-learning journeys. They chose three symbols to represent a) their motivations, b) the barriers and c) what helps overcome the barriers. We did this in three separate classes.

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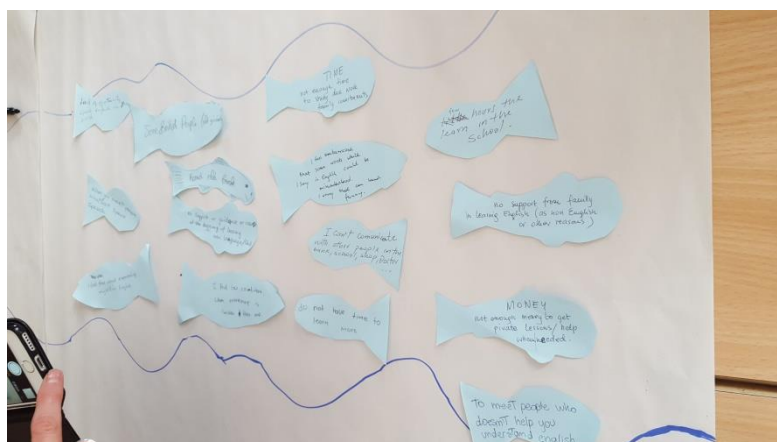
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Barriers



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At the moment, many migrants in London can't access community-based English language provision. There are several reasons for this. Firstly, existing courses are over-subscribed. Waiting lists at FE colleges are often in excess of a year and some people wait up to three years (see Refugee Action's "Let Refugees Learn" report). College courses are often far away from where people live, as provision has been reduced, sites closed and colleges amalgamated. This makes accessing classes more difficult, as it adds significant travel time to attending classes.

Another barrier is financial, "Not enough money to get private lessons" in the words of one of our students. Often only those on active benefits are eligible for subsidies or free places on college or local authority ESOL courses. Many migrants are in work on low wages and can't afford to pay for classes.

"Lack of childcare" is another barrier identified by several of our students. In Colleges, the cuts have profoundly affected crèche provision.

Another barrier is time. Many of our students work several low-paid jobs and have to spend lots of time travelling on the bus as they can't afford the underground. One student spoke at length about the difficulty of getting up at 3am for a morning cleaning shift and trying to staff awake for an ESOL class during the day. For those who have children or other caring responsibilities, this means that finding time to attend English classes can be difficult.

Finally our students spoke at length about their own lack of confidence as a barrier:

"I feel embarrassed that some words that I say in English could be misunderstood. I worry that can sound funny."

And, another comment:

"I feel fear about expressing myself in English"

Reading between the lines, this fear might be partly provoked by perceived prejudice and in some cases racism. Speaking generally involves at least two people and the role of the listener(s) can be as important as the capacity of the speaker. A sympathetic listener can work wonders for the speaker and conversely, someone who doesn't want to understand can make life extremely difficult. Unfortunately, as one of our students noted "some British people do not want to understand". Most of our students felt more comfortable communicating in English with a fellow foreign-language speaker than a native speaker.

The role of people who speak the same language eg members of the Spanish speaking communities was ambiguous. Some students said it prevented them from learning English

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because you only speak your language and not English but other people said it could help with learning.

How can these barriers be overcome?



Our students were very clear on what helps and what doesn't:

"We need more classes and more hours a week."

"we need creches"

"we need to make friends and practise".

One class in particular discussed the idea that ESOL classes should be compulsory. There was a strong consensus that this was a bad idea. First of all, they didn't think it is necessary. Our teachers agree. Saying that ESOL needs to be compulsory suggests that there is a reluctance on the part of migrants to attend classes. This does not stand up to scrutiny. Demand outstrips supply many times over. If there were empty classes we could talk about making ESOL compulsory. The barrier is lack of classes, not lack of willing. The other problem with saying that "classes should be compulsory" is that it contributes to the demonizing migrants that is ubiquitous in certain sections of the press and political discourse. An alarmingly high number of our students have experienced xenophobic and racist abuse often focusing on language. One student said she gets told to "speak English" almost every day on the bus when she speaks on the phone in Indonesian. Political discourse needs to be very careful to avoid fueling this prejudice.

Finally in the words of one of our students who was trying out a new idiom: "If there is a will there is a way". This "will" needs to come from ESOL students in the form of effort, central

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government in the form of funding, local government in terms of coordination and expert speakers in the local community who must be sympathetic listeners and provide opportunity for practice.

Thank you from everyone at English for Action!

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FAITHACTION

FaithAction manages *Creative English*, a Community-Based Language Programme (CBEL) funded by Department of Communities and Local Government (DCLG) and delivered by trained (by the Creative English team) volunteers in mosques, gurdwaras, churches and community centres. The *Creative English* methodology was developed through research conducted by Dr Anne Smith in partnership with Queen Mary University of London into approaches that facilitate belonging.

We have responded by answering the questions given by the APPG using bullets and then offering further illustration and comments below. These have been taken from our 4 years in delivering the *Creative English* programme.

1. English language provision

a) *How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes be improved?*

- **Not 'one size fits all' – English language provision needs to be flexible and capable of meeting individual needs**

As with immigration policy as a whole, there needs to be a flexible range of provision which enables a range of needs to be met: The needs of a grandmother, for example, who has no formal education in her country of birth and is illiterate in her first language are different to a someone who may have studied for their degree in English abroad but have no confidence to speak it, especially when faced by different accents and colloquialisms. A range of learning styles and needs should be catered for, with clear pathways and referral processes between them. Community-based language provision needs a 'roll-on roll-off' approach to enable learners to access it as needed, including having access to the programme for longer if necessary for those who make slower progress. If the intention is to generate belonging, and build social integration, there needs to be the option of longer term engagement with the English language rather than a one-off course, especially for those who are not interested in formal ESOL.

- **To engage the 'hard to reach', you need the two stages of language provision to support integration**

For those who are hardest to engage with English language classes, it is important that a sense of safety is created for learners, which can be done particularly effectively by community provision using volunteers or staff from the same community. *Activities for Us* in Oldham, for example, are based close to a Skills Funding Agency (SFA) funded ESOL provider, who is struggling to recruit learners as their teachers are all older white women. On the contrary, *Activities for Us* have more demand than they can accommodate in classes, as their sessions are delivered by women from the same cultural background as their learners in familiar community

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venues. The hardest to reach groups are always most likely to engage with English in a familiar venue with others from the same culture. However, the confidence developed in this context needs to be utilised in a next step which further harnesses social integration and reinforces the sense of belonging that individuals will have in their communities. Further involvement in English language might bring this (e.g. they are referred as a next step to a further mixed class to help develop further language skills).

- **Language provision should more accessible – from the beginning**

The opportunity to learn English needs to be accessible from the moment you arrive in the UK, so it should be possible to self-refer with less criteria. DCLG's CBEL provision is targeted at those who have been in the UK more than 12 months (based on self-disclosure). Centres which are effective places of integration will often have people from all sorts of backgrounds, countries of origin and lengths of time in the UK. They do not understand why a particular postcode, working arrangement or duration in the UK may exclude them from language provision. Being excluded from a class can be a very alienating experience. Community providers, such as *Creative English*, may allow learners to attend classes who are not counted as part of the funded contract, but this then creates problems in capacity for the hosting organisation. *The Hub* in Dagenham, for example, is a successful place of integration and belonging but will miss its DCLG targets as its classes contain learners who do not fulfil the DCLG criteria. When people arrive, they are often eager to improve their language and integrate and it's a missed opportunity to exclude them. Part of increased accessibility would also involve more availability of community-based language provision. The identification of areas of need via the 2011 census does not account for more recent population movement. Organisations like the *Action Foundation* in Newcastle report a huge demand for community-based language but are not currently in an area that is eligible for DCLG funding.

b) What role, if any, should central and local government, businesses, and service users play in the funding and delivery of these initiatives?

- **Infrastructure to support – nationally not just locally**

Small organisations are most effective in engaging those who are traditionally considered hard to reach. However, these small scale organisations are not able to apply for funding due to capacity, skills and knowledge barriers. There needs to be co-ordination and support at a national level to the organisations that can deliver CBEL programmes, which will also ensure that there is consistent, quality provision.

- **Service users become volunteers**

A strong evidence of success and integration is when passive recipients become active participants – i.e. learners becoming tutors or facilitators in their community hubs and

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volunteering in ways to build work experience. This also benefits communities by increasing their capacity to offer individuals tailored support. To achieve this, investment in appropriate training, mentoring and support for volunteers is necessary. This investment generates role models for other learners, and ultimately helps move learners towards employment, addressing inequalities.

- **Greater co-ordination, knowing what is happening in the local and national area.**

Learners need to be able to progress easily to the next stage, whatever that may look like for them. Greater co-ordination would improve awareness of opportunities locally and nationally and would allow for more partnership e.g. visits to/from other services commonly avoided by hard to reach groups being available to increase engagement.

c) What are the advantages and disadvantages of college-based ESOL provision and community-based English language programmes, respectively?

College-based ESOL programmes provide accredited teaching, delivered by professional staff, which is helpful in providing a formal education environment and qualifications which add progress into employment. On the other hand, many 'hard to reach' participants do not want qualifications, they simply want to be able to function in their everyday lives. To attend a college, you have to be confident enough to negotiate the venue, assessment and enrolment processes and the public transport needed to attend. Unfamiliarity with systems and a lack of confidence can be a huge barrier to access.

CBEL provision tends to take place in venues which offer activities beyond education. They therefore both provide a safe, familiar place of access and also provide opportunities to connect with others in English that are not just English language, which supports the development of wider belonging e.g. by joining a parent and toddler group or attending a keep-fit class. The informality and involvement of volunteers helps to create trust with learners who are nervous about formal education. Volunteers will also belong to the same geographical location and can therefore provide much specific local knowledge which helps learner's confidence e.g. the volunteer may attend the same doctor's surgery and therefore be able to explain precisely what will happen at that specific practice if they go there. However, referral pathways in these contexts are ad hoc and depend on the motivation of volunteers to find out what is available locally or what other services are offered in the venue.

2. Barriers to participation

a) What are the most common barriers to participation in English language classes?

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- **Fear (experience by the learner or their family)**

Fear is a significant barrier for many of the 'hardest to reach.' *Creative English* learners have described the fear of: working with those from other cultures for the first time; fear that sessions won't be delivered with cultural sensitivity; cultural barriers in the way education is perceived, especially for women; fear of failure in formal education and embarrassment that they have lived in the UK for a long time without speaking English.

- **Practical issues:**

Signing up to any sort of English language or other provision can take a lot of courage. Any practical issue which gets in the way of being able to instantly join in with an English language session, significantly reduced the likelihood of a learner coming back, especially for the most socially isolated e.g. unfamiliar buzzer or reception system to get into the venue; unfamiliar registration, enrolment and assessment processes (e.g. needing a passport, bill, form filling, having to come back at a different time or go to a different place); criteria (such as length of residency or postcode) which exclude them from that specific provision. If the day you have courage to turn up you can be welcomed into a class and take part, one is significantly more likely to remain engaged.

- **Childcare**

A lack of crèche provision or the inability to bring your children with you to the session can be a barrier for many of those most in need. Also, sessions that do not fit with school drop off and pick-up times or run during school holidays but you cannot bring your children will create drop off in attendance.

- **Interruptions in the delivery of community-based programmes**

Word-of-mouth is the most effective way of recruiting those normally considered hard-to-reach. E.g. a *Creative English* session in Dagenham which has run consistently on the same day and time regularly gets new learners without advertising, as it is a well-known source of help locally. Consistent delivery also helps to build trust through the track record of the provider in the community. Cycles of funding disrupt this continuity. A long term strategy is needed and stability for those delivering classes where word of mouth is so vital.

b) How can these be overcome?

- **Sharing learning of what works across all the English language sector**

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e.g. Faith settings being used and volunteers from the same community to build initial trust; delivering sessions which are family friendly; different methods and content to suit needs of different learners; welcoming other members of the family to the initial session to build trust

- **Long term strategy**

Long term funding will overcome the disruption and uncertainty of the current arrangements and foster the word of mouth needed to attract those most in need. It will also create better opportunity for the flexibility and progression routes that most significantly impact individual learners.

- **Learner-led decisions over their learning**

Learners should be able to self-refer onto community language programmes. Therefore, reduction of criteria is needed to enable learners to access provision that they see fit.

3. Devolution of immigration policy

a) To what extent could some of the responsibility for immigration be transferred to devolved governments, metro-regions, Local Enterprise Partnerships, or groups of local authorities?

Immigrants aren't aware of the borders between local authorities. The approach therefore needs to be national and cannot be carved up or siloed, as this generates more confusion.

Small community groups are most effective in supporting integration, as they are places of genuine friendship and connection that is not bound by the constraints of formal support. These groups cannot apply for larger scale funding and thus need to be under the umbrella of a national organisation. Expertise needs to be shared on a national level to ensure best practice and effective meeting of needs.

b) How might the establishment of a regionally led immigration system impact, positively or negatively, on levels of integration?

- **Additional criteria**

As mentioned previously, a regionally led immigration system would create additional criteria, which would complicate the access to English language provision for those on the border of different regions.

- **Variation of quality/consistency**

There would inevitably be a lack of consistency and variation in quality between regions, which would create challenges for migrants who moved e.g. *Action Foundation* in Newcastle reports

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that asylum seekers it works with are often moved elsewhere after a year and need to be able to access similar provision in their new area.

- **Loss of national support and national picture of English language**

The profile of this issue on a national level is important in bringing forward volunteers to support community language provision.

c) How might it impact on the political and public debate on immigration issues?

Immigration has been a contentious issue in the UK for more than 200 years. Although it may move the debate to comparison between regions, it is unlikely to disappear. Relationships between individuals help to shift people's perspectives as it moves grand debates to the personal. These relationships can be encouraged through facilitating opportunities to work together for a common purpose.

Why all this matters to us

A sense of belonging is integral to individual well-being and healthy, fully-functioning communities. Learning English isn't the end point; it's the start: the start of active citizens able to join in, to serve others, to coach, to teach, trade and contribute to a better Britain. Belonging involves the emotional connection that comes when you are empowered and valued – being the solution to the challenges society faces. We would be delighted to be of any further help to the APPG in this matter.

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GOOD THINGS FOUNDATION

Respondee description

Good Things Foundation is a charity that supports digitally and socially excluded people to improve their lives through digital.

We lead the Online Centres Network - a network of over 5,000 local community partners who provide specialist training and support to help people improve their lives through digital. Community partners range from libraries to community centres and learning services to social housing providers.

Good Things has been delivering English My Way, a pre-Entry ESOL programme, through the Online Centres Network since 2014 and to date has supported over 12,500 individuals to develop their English language skills.

English My Way, funded by the Department for Communities and Local Government (DCLG), is a fresh approach to learning English focused on supporting adults who have low or no English language skills to integrate with their local communities. It is delivered through a blended learning approach which mixes face-to-face tutor-led learning, classroom activities, and online learning, supported by ESOL tutors and/or volunteers working in local centres. The curriculum was developed in partnership with the British Council and BBC Learning English and all content and resources is freely available online. The Programme is currently funded until March 2017.

Our unique structure combines national management of English Language provision with hyper-local delivery, enabling low-cost, high-quality learning at scale. Our central role includes training and supporting centres, but gives them the flexibility to respond to the needs of their learners and local community.

Response

English language provision

Suggested improvements to the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes

The key for community-based ESOL is consistent and adequate funding for community organisations, who are more likely to engage 'hard to reach' learners than traditional FE provision.

Community based organisations have been providing a great service to those in their community who have no or poor English language skills for many years. They have received

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intermittent funding from various sources such as local authorities, but this has usually been short term and unreliable. Local authority funding for these types of organisation has reduced significantly in recent years, so currently many community organisations are surviving on very little funding with some keeping going entirely with volunteers.

Most of these organisations are doing their best to meet the needs of the communities they work with, but lack of funding has meant that some organisations struggle to provide the best possible ESOL, for example by not being able to recruit, retain and develop excellent teachers/volunteers.

Consistent funding is needed for those currently not eligible for mainstream funding such as spouses who are not looking for work or recently-arrived asylum seekers. If people do not start learning English shortly after arrival in the UK, they can have problems later on such as lack of self-belief in pursuing learning or ingrained mistakes in their English language skills which are hard to correct. Many of those who are not eligible for mainstream ESOL provision are parents, creating intergenerational disadvantage as they are unable to help their children with their schoolwork.

There is a severe lack of provision for beginner learners and those with no or little literacy in their first language, who arguably are the most isolated and least integrated. There is also a need for funded childcare so that women ESOL learners are able to access classes.

Role of central and local government, businesses, and service users play in the funding and delivery of these initiatives

Following on from the previous points, there is a need to develop robust programmes and systems to support community based provision to develop capacity in teaching and learning pre-entry level up to entry-level 3 English in the most cost effective way. Factors that help towards success such as good teaching models, good use of volunteers, etc. should be shared between community organisations. Good Things Foundation is a national organisation with a very local reach and an excellent model for sharing good practice with community based provision which could be utilised and developed.

- The network allows for economy of scale: at a modest additional cost, English My Way could be scaled to the whole country
- The network is extensive: it can facilitate centres working locally to share good practice e.g. training teachers/volunteers who could work across a few community organisations (gives teachers enough income to survive; centres get to share expertise at low cost).

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The factors which make ‘hard to reach’ learners more likely to attend community based provision rather than FE, or not to attend any ESOL classes, disproportionately affect women over men. Therefore, central government should provide national, strategic level guidance which would ensure that all regions have appropriate strategies to meet their local needs. It is also key that central government both funds and ensures sufficient infrastructure for quality ESOL, for example, the curriculum, qualifications for learners, qualifications and CPD (Continuing Professional Development) for teachers. The significant developments to upskill ESOL teachers, for example, as part of the Skills for Life Strategy should be built on to avoid wasteful duplication.

At the local level, provision needs to be mapped to ensure it meets local population and employer needs. It would be useful to have some local oversight to quality assure and ideally signpost learners to the most appropriate provision. It would also be useful to promote cross-sector working to ensure a holistic approach and maximise use of resources.

Advantages and disadvantages of college-based ESOL provision and community-based English language programmes

Our feedback below is informed by the views of learners and English My Way centres, which we have collated through focus groups throughout the programme.

Learners may not attend college-based provision because of many factors, but particularly for low level learners, our experience at English My Way is that growth in confidence is almost as important as language development in getting learners to take a more active role in society. Many English My Way learners are put off attending FE college classes because they find them intimidating and because they don’t generally have teachers/ volunteers who speak their language(s). Community-based centres are usually smaller, more comfortable and more sociable places where workers and learners have time for chat over a cup of tea which helps with isolation, integration, etc.

Many community based providers also offer childcare; in mainstream FE, complicated rules can apply which stop some learners accessing either childcare provision or funding.

Community based centres are often able to provide a greater level of pastoral work e.g. supporting learners with issues such as finance or housing problems, able to take learners on trips e.g. the first time ever on a bus, to a library, etc. This type of support is key in retaining learners on their English language course and in helping with integration.

Community based centres are usually near learners’ homes, are known and trusted by their community and seen as ‘safe’, especially for women learners. Many centres also provide outreach classes in venues where learners already go e.g. schools, libraries, etc.

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Community provision is usually able to have smaller class sizes than in colleges which is important especially for low level learners and those with literacy needs.

Most community organisations have volunteers whose skills are developed through training and support, while many colleges do not usually have the capacity to use volunteers. Three different English My Way evaluations found that, as well as the benefits to volunteers themselves, volunteers are very important for learners as role models who encourage learners when difficulties occur.

The following quotation is from a report from a series of British Council centre visits to English My Way centres: "In some centres, learners spoke of having tried to learn previously, but had been laughed at by friends and family when they tried to speak in English. In another centre, learners said they had attended the local college, but dropped out due to not feeling supported and because no one spoke their language."

However, there is a limit to what smaller providers can do. After the supportive environment of community based provision and to increase integration, learners need to move on to vocational courses leading to jobs, etc. Better links/ progression routes and coordination between community learning and larger colleges are needed for this to be successful, such as 'halfway house' classes with women only if appropriate - vocational courses with ESOL support. In addition, higher level learners need fast track programmes to allow them to progress quickly onto further educational opportunities or the jobs market.

Barriers to participation

Centres know the needs of the community in which they are located and as such ensure the programmes they run meet the needs of local learners.

Culture: Many centres offer single sex classes to support women who are uncomfortable with or not permitted to attend mixed classes for cultural or family reasons. As some learners need to get approval from their families to undertake learning, centres like Kensington Community Learning Centre allow learners' male family members to attend classes with the learner until all are happy with the learning context and content.

Family: Learners can have limited time to learn because of home duties, pregnancy and providing unpaid care for relatives. To overcome this, centres such as GOAL_Saltley in Birmingham have offered free crèche facilities, and break for school holidays, and others like Cooke eLearning Foundation have delivered sessions on Saturdays and during the evening when learners are available. Hackney Cooperative Developments in London work their sessions around school pick-up times.

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Health: As a result of low income, poor lifestyles and older age, some learners can suffer poor health. Doctors' appointments and feeling unwell leave learners unable to attend classes. Poor mental health, particularly for socially isolated learners and asylum seekers who have experienced stressful situations, can leave learners struggling to trust people who offer support. Additional support such as health and wellbeing programmes like those provided by Learn For Life Enterprise in Sheffield, understanding from centre staff, and additional classes, help break down the barrier of poor health, whilst still allowing learners to continue their learning.

Low motivation: Most learners lack confidence to learn, even in an informal environment, and a lack of independence can lead to less willingness to travel. Learners who have had good jobs in their native countries can have reduced motivation to begin what might be a long road to where they once were. Using volunteers to connect with and encourage learners on English My Way has really helped with this - like at Redbridge Institute - and delivering the course with other learning and interests means learners are more likely to see the benefit of learning English.

Low skilled: 39% of English My Way learners have never had any formal education meaning they may not be literate in their own language, have little knowledge of learning etiquette such as regular and prompt attendance, and are unfamiliar with using learning equipment such as a pen or a folder. In these cases, some centres have been able to give individual English My Way learners extra support by working with them in smaller groups to concentrate on individual challenges.

Language: Core centre staff often don't speak the same language as the community of people that they are trying to engage/teach. Many of our Online Centres are reliant on volunteers to support delivery of their programmes. The benefit for English My Way is that volunteers recruited are often from the same community as the people the programme is aiming to support, and speak the same language. In the first two years of the programme, 792 volunteers were used to support delivery.

When teaching ESOL it is important not to overuse the learner's first language/s as it can hinder the process of learning English. However, when engaging learners with very limited English onto the programme and selling the benefits, having someone who speaks the learners' language is a huge advantage and can help break down barriers and tackle reservations.

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GROWTH, EQUAL OPPORTUNITIES, MIGRATION AND MARKETS (GEMM) PROJECT

GEMM Overview

The GEMM project delivers an assessment of labour market inequalities of migrants and minorities in Europe. By understanding the drivers of these inequalities and determining how institutional factors account for differences between countries, we deliver recommendations of great practical and policy relevance. We especially study how the most can be made of the many highly skilled migrants to Europe, who however do not always find jobs in which their skills are used the most effectively. We achieve this through using different research methods – experiments, in-depth interviews and statistical analyses of existing data – and through considering different determinants – individual, contextual and institutional. We are then able to compare integration processes and outcomes over different countries in Europe and can highlight the factors that help to successfully integrate migrants in the host country labour market – to the benefit of minorities and the majority population. Briefings of our research are available through the website: www.gemm2020.eu

Research relevant to the APPG

GEMM research specifically answers questions related to barriers to participation, and also comments on successful regional practices. Our empirical analyses make use of established comparative and national datasets and focuses on often overlooked factors such as the social and institutional embeddedness of migrant and minority individuals. We study factors at the neighbourhood, regional or national level and include their interplay with individual patterns that influence the extent to which migrants are able to be a full part of the economic life of the host society. By showing how contextual factors shape individual opportunities this special issue provides a framework to better understand their different patterns of integration and economic success. We provide evidence on six points, shown below.

1. Using UK data we find that deprivation is the more important factor compounding disadvantage of minority and majority rather than diversity in the neighbourhood.
2. Living in an area with many minorities lowers the employment probability of 1st and 2nd generation migrants, partly because it lowers contact with natives (bridging) and strengthens minority ties (bonding).
3. Migrants and minorities have lower returns to their qualifications and face trouble upskilling.

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4. Regional characteristics shape labour market outcomes of migrants as well as 2nd generation migrants.
5. Migrants arriving with more resources upon arrival, such as economic migrants with a contract, do better in the long-run than those arriving looking for work with little support.
6. Host-country human capital including language skills are particularly important drivers of the different outcomes between migrants and of the pace of their labour market integration. One of the ways through which relative isolation therefore affects the labour market integration of migrants seems to be lower language skills and reduced contact with majority members.

Minority embeddedness and deprivation in the UK

Recent attempts to quantify social inclusion in Europe have been focusing almost exclusively on the rates of activity and employment among migrants and their offspring. Many politicians remain sceptical of selective acculturation, multiculturalism and a strong reliance upon the co-ethnic community (Cameron, 2013), and often question whether migrants and minorities can prosper under scenarios where minorities remain apart from the mainstream and live 'parallel lives'. In the context of the UK, the impact of migrants on employment prospects featured significantly in the debates surrounding Brexit and are an indispensable part of any immigration speech (Cameron, 2011; May, 2012). Whereas this optimistic picture of migration can very well hold for the aggregate, different commentators have argued that it obscures the dire state of traditional working class white communities exposed to 'unbridled' diversity and the acute competition for resources in places which 'have been left behind'; that is to say, the ones that lack the structural means to weather profound changes (Casey, 2016; Goodhart, 2013).

Demireva and Heath (2017) tackles the issue of minority embeddedness in the UK. Using data from the Managing Cultural Diversity Survey 2010 and the Ethnic Minority British Election Study 2010, we explore the activity and employment outcomes of majority and minority individuals in the UK, and examine their association with a variety of ethnic embeddedness measures. We do not find that white British respondents living in areas of high deprivation and diversity experience lower levels of economic activity or bad jobs. Deprivation rather than minority embeddedness stands out as the factor that serves to compound both majority and minority disadvantage. In the case of minorities, embeddedness does have some negative effects, although these are greatly attenuated once one takes into account the level of area deprivation. For minorities, informal bonding with co-ethnics is associated with lower chance of getting the really good jobs, in contrast with bridging social capital which involves ties with members of the mainstream. Note that the survey was administered however at the end of the economic crisis in the UK when perhaps minority contacts were particularly weakened. In

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contrast, formal bonding with co-ethnics through organizational participation seems to have if anything a positive effect, perhaps reflecting the additional cognitive and practical skills which organizational membership is believed to foster.

Local area minority concentration: limiting bridging contacts

Using the European Social Survey of 2002 and 2014 we look at whether and how living in an area with many members of a minority race or ethnic group affects labour market outcomes of natives and minorities. 1st and 2nd generation migrants in Europe who live in an area with many minorities are on average around 6 percentage points less likely to be employed than their peers, with similar socio-demographic characteristics. We test several mechanisms for this negative effect and find for 1st generation migrants this is partly due to them being more isolated and having fewer useful contacts with natives. Especially important is our finding that 1st generation migrants who live in an area with many minorities are on average 11 percentage points less likely to speak the host-country language at home. After taking this into account the negative employment effect of living in an area with many minorities drops from 6 to 4 percentage points and is no longer statistically significant.. One of the ways through which relative isolation therefore affects the labour market integration of migrants seems to be lower language skills and reduced contact with natives (Danzer and Yaman, 2013; Lancee, 2012). Living in an area with many minorities is not as negative for 1st or 2nd generation migrants if there is more tension or feelings of discrimination in the region however, and the effects further depend on regional characteristics.

Making qualifications count and regional variation in integration

With European data, Demireva and Zwysen (in progress) show that migrants and minorities struggle to have their qualifications recognized and even when they attempt to increase their educational level, such attempts bring lower returns than among majority members. The data also shows that Muslim 1st and 2nd generation men are particularly negatively affected in their employment probability in regions with lower prosperity and many migrants, indicating their sensitivity to competition. We find that the prospects of immigrants, but also of 2nd generation minorities, are particularly affected by regional characteristics, which further suggests the importance of carefully considering local characteristics in future plans of devolution of immigration policies.

Labour market integration by main reason for migration: the role of resources and host-country human capital.

We carried out a study using the 2008 ad-hoc module on immigration in the EU Labour Force Survey, on the different labour market integration patterns of migrants depending on their principle reason for migration: economic with or without a contract; study; family reasons or as a refugee. One of the big differences between migrants is the support and the network they can

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count on upon arrival, either through formal channels such as an employer or a higher education institute, or through family and friendship ties, which can help people get a good start in those early years (Aydemir, 2009; Connor, 2010). Simply comparing the different groups shows that those with more resources as they entered, such as economic migrants who came to fill a specific job rather than those coming to look for work among economic migrants; and family and student migrants rather than refugees among non-economic migrants; are less different from similar natives in their labour market outcomes. These differences in the arrival and the first years result in different integration patterns.

We also studied the extent to which migrants differ in their country-relevant human capital, such as knowing the language of the country, taking up host-country nationality or attending further training or making steps to obtain equivalent qualifications. These type of factors are part of the way in which labour market integration improves over time and can help explain long-term integration (Alba and Nee, 1997; Cortes, 2004; Dumont et al., 2016). We found that these types of investment are particularly important with regard to job quality. Economic migrants who took up host-country nationality, speak the language well and have equivalent qualifications work on jobs that are much more similar to those of their native peers; while migrants who lack these factors work on much lower quality jobs, further impeding their social integration. Migrants who report knowing the language tend to work on better-quality jobs. These types of investment are especially important in explaining the improvement of prospects over time. We found that including information on equivalent qualifications, naturalisation, language skills and recent training accounted for between 33 and 59% of the improvement in occupational status of economic migrants who came looking for work compared to similar natives 5 years after arrival. The findings of this paper highlight the importance of language skills and other investment factors in helping migrants find better jobs, leading to better long-term integration.

Work on which this review is based:

Demireva, N. and Heath, A. (2017) Minority Embeddedness and Economic Integration: Is Diversity or Homogeneity Associated with Better Employment Outcomes? *Social Inclusion* (ISSN: 2183-2803)2017, Volume 5, Issue 1, DOI: 10.17645/si.v5i1.825, Special issue "International Migration and Ethnic Integration", editors Yaojun Li and Anthony Heath. Open Access.

Demireva and Zwysen (s.d) The outcomes of migrants and minority members compared to the majority across Western Europe

Zwysen (s.d.) Different pathways to labour market integration by motivation, currently under review at peer-reviewed journal; short brief based on this work is available <http://gemm2020.eu/?resources=briefing-1-labour-market-penalties-by-host-country-human-capital>

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In addition, at the University of Essex, where the GEMM Coordinating and Secondary data analysis team is based, work on migration and other relevant topics is being carried out by the ESRC Research Centre on Micro-social change.

Work on social integration is also the primary focus of the Runnymede Trust and Dr. Omar Khan is a member of the GEMM Advisory Board.

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INSTITUTE FOR SOCIAL AND ECONOMIC RESEARCH (ISER), UNIVERSITY OF ESSEX

Understanding integration of immigrants and devolved responsibilities in communities

The Institute for Social and Economic Research at the University of Essex specialises in the production and analysis of large and often complex data sets to understand how societies are changing over time. Here we outline some of our current research on integration in communities as part of our work for the ESRC Research Centre on Micro-Social Change and we describe potential further opportunities for understanding using the rich data we have collected from ethnic minorities living in the United Kingdom, in the UK Household Longitudinal Study, *Understanding Society*.

1. Summary

- 1.1 When considering immigration and integration there has been a strong focus on economic issues to the exclusion of other aspects of life. Drawing on evidence from multiple generations of ethnic minorities, our research examines life satisfaction, racial harassment and mental health – and the effects of neighbourhood concentration. These findings point to the need to look beyond settlement (Principle 3) to other aspects of integration. We also provide further comments on the needs for more and better data on integration (Principle 5) although appreciate the focus of the call is on Principles 3 and 4.
- 1.2 Our research finds only some ethnic minorities living in communities with a higher concentration of their co-ethnic group experience higher levels of life satisfaction.
- 1.3 The second generation has a lower level of life satisfaction than the first generation, regardless of where they live.
- 1.4 Ethnic minorities living in areas with a higher proportion of co-ethnic groups are less likely to experience ethnic and racial harassment
- 1.5 Ethnic minorities living in areas with a higher proportion of co-ethnic groups experience better mental health
- 1.6 Our new and ongoing ESRC funded research programme will further unpick the issues around integration and mental health and wellbeing
- 1.7 *Understanding Society*, the UK Household Longitudinal Study, offers a unique opportunity to examine social integration. The APPG on Social Integration has already called for more and better data on the integration of immigrants. Using the Study with matched government administrative data sets, for example, will enable a better understanding of the nature of

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social integration (or lack of), access to public services, and what this would mean for devolving responsibilities.

2. Introduction

2.1 Researchers at ISER specialise in the production and analysis of large-scale longitudinal data. We are submitting evidence from our recent studies for the ESRC Research Centre on Micro-Social Change, looking at the lives of immigrants in the UK, using the data we collect in *Understanding Society*, the UK Household Longitudinal Study.

2.2 *Understanding Society* data can be very relevant to the issues investigated by the APPG on Social Integration. It allows for local area embeddedness to be captured (*Understanding Society* data can be linked to Census data) for fine-grained analysis of barriers to participation and integration. The interplay of local and community factors can serve to alleviate and compound both minority and majority disadvantage, especially over time, and only such a sophisticated source can help us uncover the questions of interest.

2.3 *Understanding Society*, the UK Household Longitudinal Study, is the largest household panel study in the world. By following the lives of all individuals within households over time, it is a vital resource for understanding the causes and consequences of fundamental deep-rooted social problems and the effects of macro socio-economic changes on individuals, families and households. Funded by the Economic and Social Research Council, a number of government departments and the devolved governments of Scotland, Wales and Northern Ireland, *Understanding Society* has been collecting data from individuals and households across the UK since 2009 and incorporates many participants from the previous nationally-funded study, the British Household Panel Survey, with data available back to 1991.

2.4 *Understanding Society* also includes a boost sample of the UK's main ethnic minority groups since its inception in 2009. In 2015/2016 an additional immigrant and ethnic minority sample was added to reflect recent changes in the UK's demography through immigration, particularly from Europe. The Study is the **only source of longitudinal data on ethnic minorities and immigrants in the UK**. Its longitudinal panel design means researchers can track how communities new to the UK are integrating into wider society and the economy – including drawing out policy learning through evidence as a result of earlier waves of immigration and what challenges remain. Researchers can match *Understanding Society* data with residential neighbourhood characteristics to track how where they live makes a difference to their lives – their socio-economic status, their families, education, work and health. They can track changes in the behaviours, attitudes and circumstances of first and second generation over time and provide a better understanding of drivers of such change. For example, do certain policies encourage integration while others hinder it?

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2.5 The data collected in *Understanding Society* now covers more than 25 years and can be linked at an individual level to government administrative data, allowing researchers to examine outcomes as a result of (large-scale) policy interventions. Here we propose the opportunity for research using *Understanding Society*. This is an opportunity to exploit the data already captured to better understand integration at a local and national level and how this might inform the case for devolution on responsibilities for integrating communities.

3. Examples of recent research for the ESRC Research Centre on Micro-Social Change

3.1 Life satisfaction

Immigrants and ethnic minorities tend to have lower life satisfaction than majority populations. However, we have only a limited understanding of the drivers of these gaps. Using *Understanding Society* as a uniquely rich, nationally representative data set with a large sample of ethnic minorities and matched neighbourhood characteristics, we test whether first and second generation minorities experience lower life satisfaction once accounting for compositional differences and whether, specifically, neighbourhood deprivation impacts their wellbeing. We further investigate whether a larger proportion of own ethnic group in the neighbourhood improves satisfaction. We find life satisfaction is lower among ethnic minorities, and especially for the second generation, even controlling for individual and area characteristics. Neighbourhood concentration of own ethnic group is, however, associated with higher life satisfaction for Black Africans and UK born Indians and Pakistanis. The effect for Black Africans may stem from selection into areas, but findings for Indians and Pakistanis are robust to sensitivity tests.

Life satisfaction, ethnicity and neighbourhoods: is there an effect of neighbourhood ethnic composition on life satisfaction? Gundi Knies, Alita Nandi, Lucinda Platt

<http://www.sciencedirect.com/science/article/pii/S0049089X16302095>

3.2 Children and young people

Cross-sectional, cross-national analyses of children's subjective well-being suggest that children in Britain are less satisfied with their life than children in other developed countries, and within countries, those of ethnic minority backgrounds tend to be less satisfied. *Understanding Society* includes interviews with children aged 10-15 and is currently the only longitudinal study in the world that has repeatedly asked large samples of children how satisfied they are with their life. Using data for the first five waves of *Understanding Society*, linked with annual neighbourhood indicators describing the social milieu (i.e. the ACORN 2013 neighbourhood classification) and the level of deprivation affecting children (i.e. the proportion of 11-15 year olds receiving free school meals), we find that females, and among them ethnic minorities in particular, are less satisfied with their life than males. By contrast, British/Irish white males in this age group are less satisfied with their life than males who self-classify as ethnic minorities, resonating with

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findings from research into structural inequalities which suggest that White British males are falling behind in domains such as education. We also find that children who move into (or out of) neighbourhoods classified as “Urban Adversity” are more (less) satisfied with their life. Whilst the former type is characterised as ‘middle Britain’ with most people being comfortably well off, i.e., they are neither wealthy nor do they have major financial worries, the latter describes areas with high levels of deprivation, debt, and social issues. These neighbourhoods are also neighbourhoods of high ethnic minority concentration. The study does, unfortunately, not include large enough samples of children from different ethnic minority groups to compare effects across ethnic minority groups.

Income Effects on Children’s Life Satisfaction: Longitudinal Evidence from England. Gundi Knies

<https://www.iser.essex.ac.uk/research/publications/working-papers/iser/2017-02>

3.3 Who experiences ethnic and racial harassment?

Using data from the largest household panel survey in the UK, *Understanding Society*, we find that ethnic minorities are most likely to experience ethnic and racial harassment and anticipate it in streets, shops and public transport. While around one in ten ethnic minorities are likely to experience it, Chinese men and women, Pakistani men, Indian-Sikh men, Indian-Muslim men and Bangladeshi women are more likely to report such experiences than others – around 15%. We also found that for most ethnic groups, twice as many people anticipate or fear harassment than actually experience it, with the exception of black Caribbean and black African groups. Additionally, women are less likely to report experiencing harassment and more likely than men to feel unsafe and avoid places, that is, anticipate harassment. The likelihood of experiencing ethnic and racial harassment is lower for those living with a higher proportion of their own ethnic group members after accounting for area level deprivation. These patterns persist after accounting for contextual factors that vary across ethnic groups.

Who experiences ethnic and racial harassment? Alita Nandi, Renee Reichl Luthra

<https://www.iser.essex.ac.uk/files/projects/health-and-harassment/Health%20and%20Harassment%20Briefing%20Note%20Oct2016.pdf>

3.4 Resilience to racist abuse – the impact on mental health

In this study, using data from *Understanding Society* over the period 2009-2014, we find that ethnic minorities with lower socio-economic status and those who were born in the UK report worse mental health (GHQ). Those who report experiencing ethnic and racial harassment also report worse mental health than those who do not. We also found that ethnic minorities living in areas with a higher proportion of co-ethnics reported better mental health. However, ethnic concentration was not protective; rather, ethnic and racial harassment had a stronger negative association with mental health for UK born minorities living in such areas. We identified

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additional resilience factors: number of close friends and having certain personality traits – higher levels of Openness to Experience and Conscientiousness.

Ethnic and racial harassment and mental health: identifying sources of resilience. Alita Nandi, Renee Reichl Luthra, Michaela Benzeval

<https://www.iser.essex.ac.uk/research/publications/working-papers/iser/2016-14>

4. What opportunities does *Understanding Society* offer the Inquiry?

4.1 The APPG on Social Integration's Interim Report has identified *Understanding Society* as a potential source of data to support and inform social integration policy. A significant gap in our knowledge has been in being able to look at temporal issues at the individual level – how immigrants and ethnic minorities' behaviour, interactions, experience and views evolves over time. This is essential for understanding labour market and other inequalities and impacts and how they are changing, and for understanding patterns of immigrant incorporation and adaptation, and the individual-level and contextual factors that influence them.

4.2 *Understanding Society* is representative of UK residents of all ages enabling differential impacts of change to be examined across young people, men and women, different ethnic groups, etc. Its multi-topic content enables researchers and policy makers to examine key domains of people's lives – for example, their family, health, wellbeing, employment, education, housing, neighbourhoods, income, expenditure, wealth, attitudes and beliefs, social networks, transport and time use – and the inter-relationships between these. Understanding these inter-relationships is important to inform a comprehensive rather than piece-meal approach to social integration. As recommended in the *Interim Report into the Integration of Immigrants*, integration should include all three dimensions - economic, social and civic - but there remains an active debate and differences of opinion about the relative importance, interaction and 'ordering' of these dimensions.

4.3 *Understanding Society* also examines a range of discrete topics essential for understanding immigrant and ethnic minority integration. Data is being collected and further collection being rolled out on discrete modules, each including various questions, on:

- migration intentions
- migration reasons
- first job in the UK
- additional background family information
- educational qualification gained abroad
- British citizenship intentions
- migration history, harassment, discrimination, remittances, ethnic identity, service use, religious practice

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- religious belonging
- political engagement
- Britishness

We would be happy to discuss our current plans and what more needs to be done to improve data collection with the APPG.

*Note: Further evidence from the University of Essex has been submitted separately by the **Growth, Equal Opportunities, Migration and Markets (GEMM)** project, based at the Department of Sociology.*

This evidence is submitted to the All Party Parliamentary Group on Social Integration by the Institute for Social and Economic Research, University of Essex, United Kingdom.

www.iser.essex.ac.uk

March 2017

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INSTITUTE FOR PUBLIC POLICY RESEARCH (IPPR)

1. ESOL PROVISION

IPPR has recently undertaken research among harder-to-reach migrant groups, who have struggled to access the provision for ESOL and other integration options. This research was published in our recent publication, '[Come Together: Lessons from Bedford on reaching out to Britain's most isolated minorities](#)'. As part of this research we held focus groups with panels of migrants who had been in Britain in the medium to long term, predominantly of South Asian, Muslim backgrounds, yet who had struggled to access the English provision they needed.

We identified several key barriers to accessing English language provision.

Money

A key concern for the women we spoke to was securing funding to access English language provision. For many of the women we spoke to, incomes were very low; many had arrived on family visas before the £18,000 income limit was set, many households had very little income.

Firstly, that meant English classes were simply an unaffordable luxury. The low incomes, combined with larger than average family sizes, left little spare cash for English classes. Many women told us that if they were able to find the money, they would not prioritise their own self-improvement over their children's. Having migrated across the globe to secure a better life for their children, they would channel resources into improving their children's prospects as much as possible.

Secondly, that meant there was little money to spend on labour-saving devices in the household. This meant women's time (and frequently daughters' time) was spent cooking, washing and cleaning. English classes firstly were too expensive, and secondly not feasible given household responsibilities.

Attitudes of family members

When asked about what factors helped or hindered their integration into Bedford society, many Muslim women told us that the attitude of their family members could be the decisive factor. In many families, members including husbands, mothers-in-law and sons were reluctant to see women socialise outside the home and extended family. This opposition was attributed to a range of factors. We heard that it was linked to cultural heritage, as traditionally women did not often leave the home in their country of origin. Some women and service providers told us it was motivated by concerns that women would become westernised and subsequently neglect their duties at home.

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The attitude of family members is a critical obstacle to the integration of many Asian women. We heard how justifications for this attitude have changed – as families have become more settled in the UK – from one generation to another (although for the women, the outcome was the same).

For example, one focus group participant told us: ‘Husbands believe women have to stay home because that’s how they were brought up: it’s traditional. But sons are more educated, more curious. They read the Qur’an and they see the role of women in there, so they are able to tell us, “You have to stay home, it’s in the Qur’an, it’s God’s word.”’

In contrast, for some Asian women, family members were the facilitators of their greater integration. One woman told us her parents-in-law had been very conservative, refusing to allow her to learn English. Her husband interceded and he and his wife moved away from his parents to ensure she was able to pursue English lessons. We also heard from many women that they were keen to facilitate their children’s language development and wider integration. For some, children had been instrumental in helping their parents’ integration – for example, mothers’ accompanying their children to kindergarten classes, or becoming involved with their schooling, in some cases spurred their own English language development.

Self-confidence

Almost all the Asian women we spoke to reported low self-confidence as a key inhibitor of integration. Many told us they were reluctant to speak to authority figures such as teachers or council staff. This lack of confidence was perpetuated by both cultural and practical factors. Firstly, women from conservative cultures traditionally engaged only rarely with authority figures. Secondly, they were reluctant to show their lack of knowledge of how official systems worked, or their poor English skills.

The women’s lack of confidence constrained them in other ways. For example, it contributed to a reluctance to leave an area where they could be sure there were other members of their community. A service-provider explained some of the practical issues involved: ‘The [Asian Muslim] women are particularly unlikely to drive. Their English is poor so they’re afraid of going to unfamiliar areas in case they get lost and there’s no Bangla-speakers [sic] they can ask for help. They have no money to get a taxi if they get stuck, so it’s impossible to leave their little area.’

These profoundly low levels of self-confidence meant women were unlikely to find the critical steps necessary – such as signing up for a class, travelling to a college, contacting an ESOL provider – next to impossible.

Different genders, different dynamics

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During our research in Bedford, we established that different patterns of language learning have established themselves between men and women from the Asian and Eastern European communities. Men from the Polish community were generally seen as less well integrated than Polish women, as the men's jobs in construction, agriculture and factories did not require strong English language skills while, by contrast, Polish and other eastern European women tended to speak better English because they worked in the service sector in outwardly-facing roles and had to interact with schools after they had children. This helped them to integrate better than their male counterparts, who tended to work and socialise in their own language, with fewer interactions with other ethnic groups. By contrast, Asian men tended to work in factories, in hospitality or as taxi drivers, meaning they improved their English while their wives stayed home speaking their native tongue.

Compelling or convincing?

Frontline politicians have increasingly made the case recently for compulsive measures, such as docking benefits or even making future immigration status dependent on learning English, as suggested by David Cameron. Over the course of our research, among interviews with service providers and frontline staff, we found small pockets of sympathy for this approach, particularly in helping women overcome the opposition of conservative family members.

But our research in Bedford found that adjustments to accommodate the Asian women, and empower them to overcome the obstacles to their integration, were effective. Some of these adjustments could be relatively straightforward and cost-effective. For example, in Bedford we found that local schools had made changes to how parent engagement was structured to take account of the fact that Asian mothers sometimes spoke poor English or were intimidated by engaging with the authority figures of a school.

Other adjustments involved making judicious compromises, where it was judged acceptable to the local community. For example, a swimming pool in Bedford held a women's only session that was predominantly attended by Asian women. This allowed their families to be sure that it was not mixed-gender, it allowed them to pool childcare costs, and meant well-integrated women got to know less-well integrated women, building the support networks of the latter and boosting their confidence. This was only possible because the Bedford swimming pool and provider judged this would be an acceptable compromise. A similar swimming pool in nearby Luton which had a men-only session attracted controversy.

2. Regional Migration

What is regional migration?

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A regional migration policy is a system for managing immigration flows to the UK that allows for visa rules to vary across the UK's nations and regions. Underpinning the policy is a system of visas that entitle migrants to work and reside in a specific region of the UK. While some migration routes would continue to operate on a UK-wide basis, certain routes – for instance, skilled workers or post-study work – would be decided at the regional level. This would mean migration could be used strategically, building in a regional flex to the current, one-size-fits-all national policy.

Contrary to some accounts, regional migration would not require erecting new borders across the UK. It is obviously not possible or desirable to restrict freedom of movement within the UK for anyone, migrant or otherwise. But it is feasible to impose restrictions on where migrants can work and rent. This would not impede migrants from easily travelling around the UK, though in practice they are likely to spend most of their time near their places of work and residence. Such a system already takes place on a larger scale in the Schengen Area. A third-country national can apply for a visa to work in Germany, which theoretically allows them to travel to anywhere in the Schengen Area – but they would not be entitled to *work or reside* in any country apart from Germany.

IPPR has long advocated a more locally-oriented attitude to migration. Different areas of the UK have had vastly differential experiences of migration. Yet while other areas of policy are more locally tailored than ever before, migration policy remains UK-wide. In our recent report *[Regionalising Migration: The North East as a Case Study](#)*, we argued that migration could be deployed more strategically to meet the North East's demographic and skills challenges while also addressing public concerns. By creating a North East Post-Study Work Visa, the region's skilled international graduates would be able to stay and fill local skills gaps. A North East Investor Visa would allow the region to attract international investment, while a North East Shortage Occupation List would allow the region to attract skills internationally that it cannot fill in the domestic market.

Could a regional migration system help promote social integration?

While this question has not been part of our research so far we have identified a number of ways in which regionalising migration policy could support the goal of promoting social integration.

1. Giving local actors greater agency over migration policy could help ensure that policies take greater account of the impacts of different migration flows on communities. At present, decisions about migration policy are primarily driven by the aim to bring down net migration, and are divorced from considerations about their likely impacts on integration. As argued by IPPR, this has driven policies which promote temporary

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migration¹⁷ and increasingly inhibit (rather than incentivise) integration. Local decision makers will be far more aware of the implications of such decisions and the effects that they have on public services and communities. They are therefore far more likely to take account of these impacts when making decisions about migration.

2. Regional migration could facilitate integration by helping ensure that decisions on visas are closely tuned into the needs of local economies. This levels of matching would help ensure that migrants arriving in different areas are well prepared to enter the local labour market – arguably the most critical step in the integration process.
3. Wider considerations about the impacts of migration could be taken into account when calibrating a regional migration system. For example, areas where there is evidence that migration has accelerated too rapidly and where infrastructure and communities were being put under pressure, could be given the option to restrict numbers.
4. Recent years have seen a growing trend towards far more transient migration. As a consequence, many migrants have remained relatively detached from the wider community.¹⁸ The fact that migrants are being sponsored by a particular region could create a greater sense of attachment to place, particularly if they are accompanied by proactive efforts by local actors to promote their inclusion and involvement (for example, ensuring that there is a clear pathway to citizenship and that this process is closely linked to the local area).

¹⁷ See *Trajectory and Transience: understanding and addressing the pressures of migration on communities*

¹⁸ See *Shared Ground: Strategies for living well in an era of high migration*

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KIRSH, JUDY

Submission by Judy Kirsh, ESOL consultant, teacher-educator, ESOL teacher, ESOL materials writer.

More than 30 years experience in the sector.

a) How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes be improved?

Research has shown that the sooner migrants are able to access English classes, the faster their progress and the sooner they are able to integrate into life in the UK. Therefore, I believe that those on spouse/fiancé visas, in particular, should be able to attend funded ESOL provision as soon as they arrive rather than having to wait at least a year, as at present. The cost of private EFL classes or international fees for ESOL provision is prohibitive for most new arrivals and it is this time which is crucial for building confidence and promoting language development. Many wives fall pregnant during the first year and therefore delay attending ESOL classes for several years due to childcare responsibilities, also becoming dependent on their husbands/families for translation at the doctors, etc. This is another reason for not delaying access to funded provision.

Examples of successful initiatives: EIF projects

Projects funded by the *European Integration Fund* (EIF) in recent years can provide good models for language and integration https://ec.europa.eu/home-affairs/financing/fundings/migration-asylum-borders/integration-fund_en Many projects throughout Europe developed innovative schemes to assist the integration of migrants, ranging from workplace initiatives and websites providing resources to supporting university students to become ‘befrienders’. For information on British projects, see

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461005/List_of_funded_projects{EIF.pdf}](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461005/List_of_funded_projects{EIF.pdf)

In the UK, the British Council’s NEXUS project was one of the largest and has benefitted thousands of teachers and learners <https://esol.britishcouncil.org> Some EIF projects enabled recently-arrived third-country national (TCN) women, who were a priority group, to benefit from integration-focused ESOL courses. Having worked on a couple of the projects led by LLU+, now Learning Unlimited (a social enterprise based at UCL Institute of Education), I could see the huge benefit to the learners – the dramatic increase in their confidence and skills, as well as increased knowledge of life in the UK. As mentioned during the APPG meeting, integration is a ‘two-way street’; the projects not only provided essential ESOL courses but also many links to the local community, recruiting local women as volunteer befrienders.

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A brief summary of the key features of two of the projects is given below. Details can be found at <http://www.learningunlimited.co/projects/previous-projects/wttuk> and <http://www.learningunlimited.co/projects/ace> (including links to the Impact Assessment Reports).

Welcome to the UK (WUK) was a 3-year, multi-strand project which worked with partners in the UK. It included:

- A skills check, initial assessment, 1:1 interview and **Welcome to the UK ESOL courses** for TCN women
- Support from a **volunteer befriender**
- Recruitment of adult volunteers wanting to become befrienders, including training programmes and on-going support
- Opportunities to **engage with the local community** through termly events, such as 'Emergency Services'
- Regular trips and visits to local places of interest, e.g. library, supermarket, park, community centre
- Free Oyster cards and **childcare** (crèche or childminders)

Active Citizenship and English (ACE) was a 2-year project which built on the success of *Welcome to the UK*; the main strands were:

- **ACE ESOL courses** for TCN women
- **Volunteer befrienders** and volunteer befriender training programme with on-going support
- Opportunities to **engage with local people and local communities** through termly events, such as 'Talking Politics', 'Home Safety'
- Trips and visits to local places of interest
- Vocational **'taster' workshops and short courses**
- **Volunteering opportunities** for migrant women
- Literacy for Active Citizenship – writing 'easy readers'
- Capacity building training and support
- Free Oyster cards and **childcare** (crèche or childminders)

Examples of ACE learners' feedback (in final Impact Assessment report):

'the course is very good for women as there is a crèche ... helps them to come and learn ... before I learnt English then I had to stay home with the baby for 3 years, I forgot all my English ... now I can speak English and I'm confident. Crèche is most important for women.'

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'Now I feel more confident, I can speak with other persons, I can do more for myself ... go to the hospital, doctor ... before I can't do it ... everything is new for me ... now I feel better ... everything in my life has changed because of this project'

'Before when I came here I couldn't speak English ... now I can anywhere ... if I don't know, I ask for help. I speak to people. It's easy for me now ... English class most important ... in class, teacher, classmates, we all can help each other'

'I've improved my English as I have opportunity to talk to people, teacher can correct me ... biggest change for me is improvement in English.'

'Learnt more about London and England, its cultures (diverse) origins and traditions. Improved my english and boost my confidence, in speaking. Improved conversation skills.'

'I learn how to vote, get new experience'

'Before I took this class I didn't know much about UK history or politics or community'

For more details, go to <http://www.learningunlimited.co/projects/ace> (including links to Impact Assessment Reports)

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KOK, VICTOR, CPA, CGA

Submission by: Victor Kok, CPA, CGA
Date: March 13, 2017
Sent via e-mail to: appg.socialintegration@thechallenge.org

This is a submission from Victor Kok in response to APPG's Call for Evidence on February 3, 2017.

Victor Kok, CPA, CGA is a Regulated Canadian Immigration Consultant who advises on business immigration and compliance issues. Prior to this, he served as a Designated Immigration Officer at the Canadian Embassy in Beijing, China, and as a Program Advisor to the British Columbia Provincial Nominee Program in Vancouver, Canada. He is a member of the Chartered Professional Accountants of British Columbia, and a graduate of the Vancouver School of Economics at the University of British Columbia.

Introduction

Thank you for the opportunity to participate in Stage Two of APPG's inquiry into immigration and integration. This topic is equally relevant and timely in Canada as we also debate new approaches and best practices to make our immigration system more efficient and effective.

Drawing on past experience, from different perspectives in the Canadian immigration process, I will address topics 3 and 4 of your recent call for evidence concerning the transfer of immigration responsibilities to regional authorities, with examples of regional immigration programs from Canada.

I will provide an overview of Canada's Provincial Nominee Model. List some its advantages and disadvantages. Then, outline characteristics of common program streams implemented across the country, with human capital factors highlighted as predictive indicators for successful economic integration.

The Provincial Nominee Model

The Provincial Nominee Program (PNP) was introduced in 1998 to give Canadian provinces a mechanism to respond to local economic development needs.

Of Canada's 10 provinces and 3 territories, the following have active programs:

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- Alberta ¹⁹
- British Columbia ²⁰
- Manitoba ²¹
- New Brunswick ²²
- Newfoundland and Labrador ²³
- Northwest Territories ²⁴
- Nova Scotia ²⁵
- Ontario ²⁶
- Prince Edward Island ²⁷
- Saskatchewan ²⁸
- Yukon ²⁹

The Province of Quebec is not a nominee program.³⁰ It has its own separate immigration program through a signed accord with the federal government.³¹ The Territory of Nunavut does not have a nominee program.

In Canada, the role and responsibility for immigration is shared between the federal and provincial/territorial governments.³² When there is a dispute in this area of law, federal legislation will prevail.³³

While the federal ministry Immigration, Refugees and Citizenship Canada (IRCC) administers Canada's immigration policies through the *Immigration and Refugee Protection Act*, provinces

¹⁹ <http://www.albertacanada.com/opportunity/programs-and-forms/ainp.aspx>

²⁰ <https://www.welcomebc.ca/Immigrate-to-B-C/B-C-Provincial-Nominee-Program>

²¹ <http://www.immigratemanitoba.com/immigrate-to-manitoba/>

²² [http://www.welcomenb.ca/content/wel-](http://www.welcomenb.ca/content/wel-bien/en/immigrating/content/HowToImmigrate/NBProvincialNomineeProgram.html)

[bien/en/immigrating/content/HowToImmigrate/NBProvincialNomineeProgram.html](http://www.welcomenb.ca/content/wel-bien/en/immigrating/content/HowToImmigrate/NBProvincialNomineeProgram.html)

²³ <http://www.nlpnp.ca/>

²⁴ <http://www.immigraatenwt.ca/>

²⁵ <http://novascotiaimmigration.com/>

²⁶ <http://www.ontarioimmigration.ca/en/pnp/index.htm>

²⁷ [https://www.princeedwardisland.ca/en/information/office-immigration/provincial-nominee-](https://www.princeedwardisland.ca/en/information/office-immigration/provincial-nominee-program)
[program](https://www.princeedwardisland.ca/en/information/office-immigration/provincial-nominee-program)

²⁸ [https://www.canadianimmigration.com/immigration-to-canada/provincial-nomination-](https://www.canadianimmigration.com/immigration-to-canada/provincial-nomination-program/saskatchewan/)
[program/saskatchewan/](https://www.canadianimmigration.com/immigration-to-canada/provincial-nomination-program/saskatchewan/)

²⁹ <http://www.education.gov.yk.ca/YNP.html>

³⁰ <http://www.immigration-quebec.gouv.qc.ca/en/index.html>

³¹ <http://www.cic.gc.ca/english/departement/laws-policy/agreements/quebec/can-que.asp>

³² Canada has three main levels of government: Federal; Provincial / Territorial; and Municipal.

³³ Section 95. <http://laws-lois.justice.gc.ca/eng/const/page-4.html#h-24>

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and territories are empowered to nominate candidates who satisfy their own selection criteria, through Provincial Nominee Programs (PNP) established by Federal-Provincial/Territorial Agreements.³⁴

These agreements are negotiated separately between IRCC and the provinces /territories to address local economic needs and priorities. The agreements layout the roles and responsibilities for immigration, and outline how the governments plan, consult and cooperate with one another on immigration matters, such as settlement, information sharing, program integrity, and dispute resolution.

In consultation with the provinces/territories, IRCC develops an annual Immigration Levels Plan that sets the target number of immigrants Canada will accept each year. In 2017, Canada is expected to welcome between 280,000 and 320,000 (target 300,000) new permanent residents from four immigration categories: Economic (58%), Family (28%), Refugees and Protected Persons (13%) and Humanitarian and Other (1%).³⁵

Taking into consideration the economic, demographic, and social objectives of each region, IRCC allocates to the provinces/territories a set number of nominations under the Provincial Nominee Class. For 2017, this allocation is 51,000 representing 30% of the Economic Immigration category.

When an applicant submits a PNP application, it undergoes two stages of review.

The first stage involves the province/territory evaluating whether an applicant satisfy the eligibility and selection criteria for nomination. If the applicant is nominated, a Provincial Nominee Certificate is issued. An application for permanent residency is then submitted to IRCC for the second stage of review.

The selection criteria and nomination process for each PNP varies from one provincial/territorial jurisdiction to another. Although provinces and territories have the ability to nominate candidates who suit their local economic needs, final authority to approve immigration visas and permanent residence rests with IRCC.

In the second stage of review, IRCC evaluates whether the applicants can establish themselves economically in Canada. They also determine the applicants' admissibility with respect to statutory requirements such as health, criminality and national security, before immigration visas can be finalized.

³⁴ <http://www.cic.gc.ca/English/department/laws-policy/agreements/index.asp>

³⁵ <http://www.cic.gc.ca/english/department/media/notices/2016-10-31.asp#fn3>

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The applications are also risk assessed for misrepresentation and non-compliance to ensure program integrity. These responsibilities are delegated by the Minister of Immigration to program managers and immigration officers at embassies and high commissions abroad, as well as, ports of entry and case processing centres in Canada.

When applicants arrive in Canada with their immigration visas, they obtain permanent residency rights that can then lead to citizenship once certain obligations and requirements are fulfilled.³⁶

Evaluation of the Provincial Nominee Program

An evaluation of the Provincial Nominee Program was conducted by IRCC in September 2011. Although this report is dated, given major changes that have taken place since the report was first published, its findings and recommendations are relevant for reference.³⁷

Outlined below are some advantages and disadvantages of the PNP model:

Advantages

- Empowers regions to attract immigrants who can address their immediate labour market needs and economic development priorities such as population growth and business investment;
- Enables regions to manage selection and nomination criteria in a timely and effective manner to suit local requirements, and to respond flexibly to the changing needs, demands and issues of stakeholders;
- Effective at addressing labour shortages and regionalizing immigration settlement outside urban metropolitan areas;
- Increases the likelihood of economic establishment and integration by adopting selection criteria based on human capital factors;
- Encourages constructive engagement with employers, industry associations and other stakeholders for support to shape immigration policies beneficial to the local level.

³⁶ To maintain Canadian permanent residence status, individuals must live in Canada for at least two years in a five-year period. To obtain citizenship, individuals must have been physically present in Canada as a permanent resident for at least 1,460 days during the six years immediately before the date of applying for citizenship. Individuals also must be physically present for at least 183 days during each of four calendar years that are fully or partially within the six years immediately before the date of applying for citizenship. Individuals must demonstrate adequate knowledge of one of Canada's official languages, and pass a citizenship test that covers Canadian history, values, institutions and symbols.

³⁷ <http://www.cic.gc.ca/english/pdf/research-stats/evaluation-pnp2011.pdf>

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Disadvantages

- Competing programs with similar selection criteria but differing nomination mechanisms may create potential loopholes that have unintended policy outcomes;
- An additional level of bureaucracy is created where immigration work and processes may be duplicated, increasing costs, delays and inefficiencies;
- Multiple program streams with varying criteria that can change suddenly may confuse and discourage applicants from applying due to potential costs, complexity and uncertainty;
- Program integrity of programs could be threatened if governments do not have sufficient authority, resources and resolve to monitor and enforce compliance;
- Labour market and population growth objectives may be hindered if immigrants move away, from the province/territory that initially nominated them, to other regions after obtaining immigration status.

Nominee Program Streams

Provincial Nominee programs have different program streams that target specific groups of applicants such as skilled workers, graduate students and entrepreneurs.

In 2011, more than 50 program streams were operating in 11 Canadian jurisdictions. For brevity, we will generally outline characteristics from three program streams commonly found across Canada.

Skilled Worker Stream

- Program is 'employer driven';
- Applicants require a job offer of full-time indeterminate employment from a qualified employer to be eligible;
- For employers to qualify, they must meet specific requirements such as:
 - Be an incorporated company;
 - Have indeterminate full-time employees;
 - Been in business for a number of years;
 - Have made reasonable efforts to hire domestically;
 - Have a history of good workplace and labour practices;
 - Offer employment at competitive market wages that meet industry standards;

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- Program targets high skilled occupations (NOC A, O, B). However, some programs target employment semi-skilled occupations (NOC C and D), in remote areas that have a critical labour shortage;³⁸
- Nominated applicants can obtain work permits to work for their employer immediately, while their application for permanent residence is being processed by IRCC.

Strategic Recruitment Stream

- Program targets applicants who match identified labour market demands and can promote population growth;
- A full-time job offer is NOT required to be eligible, due to the existing and future demand for the occupation or skill;
- Some program streams target international students who have completed a Masters or PhD degree within the province, usually from a science, technology, engineering or math (STEM) field of study;
- Some program streams target specific occupations that are in high demand;
- Nominated applicants can obtain work permits to work for their employer immediately, while their application for permanent residence is being processed by IRCC.

Business Stream

- This program stream seeks to bring significant economic benefit to the region by encouraging business investment, job creation and economic diversification;
- Program typically targets experienced entrepreneurs who are ready to invest in, reside in, and actively manage a business in the intended province;
- Entrepreneurs may establish a new business or acquire and improve an existing one (e.g. succession buy-out);
- Some programs target business people with farm management experience to own and operate a farm in Canada. (Alberta, Saskatchewan, Manitoba);
- Some programs target international corporations to set up their operations in Canada (British Columbia, Ontario);
- Investors are explicitly not permitted under these programs due to exclusions within IRPA regulations to prevent the provincial nominees program from undermining the federal immigrant investor program;³⁹

³⁸ NOC stands for National Occupation Classification, Canada's official job classification system.
<http://www.cic.gc.ca/english/immigrate/skilled/noc.asp>

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- Human factors are considered in selection criteria, as well as net worth, business experience and proposed business plan;
- Minimum net worth requirement can range from \$250,000 (Northwest Territories) to \$1.5 million (Ontario);
- Net worth must be legally obtained and demonstrated by providing documentation showing legal source of funds, or through third party verification;
- Entrepreneurs must have at least 3 year of work experience as business owner, entrepreneur or senior manager with relevant, transferrable management skills;
- Minimum investment amounts in tangible assets can range from \$150,000 to \$1 million depending on PNP;
- Applicants must own at least 1/3 equity of the business being established or purchased, unless investment exceeds \$1 million;
- A business plan and interview are required to evaluate the applicant's ability and feasibility of proposed business venture;
- Applicants may be nominated after fulfilling a business performance agreement with a two-year work permit; or make a good-faith deposit that is refundable upon fulfilling the performance agreement terms and conditions.

Improving Integration Prospects

Provincial Nominee Programs primarily focus on attracting applicants who have the ability to become economically established in Canada. Similar to Canada's federal economic immigration programs, PNP program streams employ a selection criteria based on human capital factors.

Human capital factors considered include:

- Age
- Language proficiency
- Education
- Work Experience
- Adaptability (e.g. prior study or work experience in Canada, spouse who is also educated and language proficient, etc...)

³⁹ The federal Immigrant Investor Program was terminated in 2014. Suggestions for a new Canadian investor program were proposed by attendees at a recent Entrepreneur & Investor Immigration Summit in December 2016, organized by the Conference Board of Canada. Report of recommendations from the Summit's participants are expected to be released in early-2017.

<http://www.conferenceboard.ca/conf/16-2202/default.aspx>

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For entrepreneurs, additional factors are considered such as:

- Personal Net Worth
- Business/Management Experience
- Proposed Business Plan (investment, job creation)

While these factors may increase the likelihood of successful economic integration, it does not address the social, cultural or civic dimensions of integration that are equally important in nation building.

Some recent efforts have been made to address these dimensions of integration. For example, a new Atlantic Immigration Pilot was launched in March 2017, which requires participating employers to play a more active role in settlement and integration by working with local immigrant support agencies.⁴⁰

Conclusion

The ability to select and nominate immigrants is an immigration responsibility that can be successfully transferred to regional authorities.

By managing immigration selection and nomination criteria in a timely and effective manner to suit local requirements, regional authorities are empowered to address their immediate labour market needs and economic development priorities, while responding flexibly to changing demands and issues.

Canada has employed a range of regional immigration programs, known as Provincial Nominee Programs, which have been effective in addressing labour shortages and regionalizing immigrant settlement outside urban metropolitan areas.

By selecting immigrants using a human capital model, these programs have been positive in increasing the likelihood of economic success and integration. However they do not actively address the social, cultural or civic dimensions of integration.

Regional immigration programs are challenged by social, cultural and market forces that drive individuals to make rational choices that satisfy their personal utility. Due to mobility rights, immigrants (and citizens alike) may move away from the regions that need them most to go to urban centres where employment, education, health and lifestyle opportunities are more attractive.

⁴⁰ <http://www.cic.gc.ca/english/immigrate/atlantic/index.asp>

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Immigration policy cannot be a replacement for social and regional economic development policies. However, it is an effective policy tool that can be leveraged to encourage positive outcomes in these areas.

Victor Kok, CPA, CGA

Beijing, China

March 13, 2017

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LONDON CHAMBER OF COMMERCE AND INDUSTRY

1. London Chamber of Commerce and Industry (LCCI) is the largest capital-focused business advocacy organisation representing the interests of over 3,000 companies from small and medium-sized enterprises through to large, multi-national corporates. Our member companies operate within a wide range of sectors across all 33 London local authority areas – genuinely reflecting the broad spectrum of London business opinion.
2. As the voice of London business we seek to promote and enhance the interests of the capital's business community through representations to central government, the Mayor and the GLA, Parliament and the media as well as relevant international audiences. Through member surveys and commissioning research, we seek to inform and shape debates on key business issues.
3. LCCI welcomes the APPG for Social Integration's inquiry into immigration and integration, and the opportunity to input into the further examination of proposals that Government reassess its current 'one size fits all' approach to immigration policy. This submission will address questions concerning the 'Devolution of immigration policy'.
4. In November 2016, LCCI published **Permits, Points and Visas: Securing practical immigration for post-Brexit London**⁴¹. This report considered the twin issues of how the UK should manage the 771,000 EU nationals already living in London, and how to ensure businesses' continued access to skilled workers from inside and outside the EU in a post-Brexit future. The report was published alongside a separate analysis⁴² by Cebr, commissioned by LCCI, which calculated the economic contribution made by migrants working in the capital.
5. This Cebr analysis concluded that London has a unique relationship with migrants, both in its reliance on foreign workers comparative to the rest of the UK, and the contribution of its non-UK nationals to the public purse through taxation. Not only do migrants constitute 25% of the capital's workforce, compared with 8% across the rest of the country, they generate an estimated £44bn in GVA per annum and paid an estimated £13bn in direct taxes in the past year.
6. Foreign workers are performing roles that employers in London have been unable to fill from within the domestic labour market. A LCCI/KPMG⁴³ study identified a 20% skills gap

⁴¹ <http://www.londonchamber.co.uk/docimages/14742.pdf>

⁴² <https://www.cebr.com/reports/working-capital-the-role-of-migrant-workers-in-driving-londons-economy/>

⁴³ <https://home.kpmg.com/uk/en/home/insights/2014/11/construction-skills-index-2014.html>

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in the capital's construction sector, while Cebr analysis reported 21% of financial services sector vacancies remained unfilled in 2015. In London, migrant workers help to fill these gaps, with foreign workers holding 24% of jobs in financial services, a typically highly-skilled industry, and 36% of roles in construction, many of which are less skilled positions.

7. LCCI polling conducted in August 2016, less than two months after the EU Referendum, found that continued access to EU workers was a primary concern for business with 31% of London firms citing minimising restrictions on EU nationals as a priority. To address this concern, in our November 2016 report we recommended that the Mayor of London champion a '**London Work Visa**' for existing EU nationals within London's workforce.
8. A single issue 'London Work Visa', granting 'indefinite leave to remain' specifically for EU migrants already working in the capital, would provide necessary reassurance to London's businesses and their EU employees. To mitigate against a sudden influx of migrants from EU countries, eligibility for such a visa could be based on a valid contract and reference from a London employer as well as the applicant's arrival date in the UK (for example, after the Referendum or before the triggering of Article 50).
9. Although we believe that the final authority to approve applications and administer the 'London Work Visa' should lie with UK Visas and Immigration (UKVI), with eligibility criteria ultimately determined by the Home Office, we also see a role for London government. We have suggested that City Hall should convene a taskforce to consider how the 'London Work Visa' should practically work for EU nationals and the capital's business.
10. We have argued consistently that rather than maintaining uncertainty over the status of EU nationals as a bargaining chip with her European counterparts, the Prime Minister should not delay in addressing the concerns of the thousands of EU nationals working in London.

Question: To what extent could some of the responsibility for immigration be transferred to devolved governments, metro-regions, Local Enterprise Partnerships, or groups of local authorities?

11. LCCI advocates a set of proposals that seek to recognise and facilitate the vital economic contribution made by migrants to London's economy but which, by placing restrictions on where migrants are able to work (i.e. only within Greater London), would act, we believe, to mitigate concerns in other regions about migration into their own localities and communities.
12. These proposals, including a new '**Capital Work Permits system**' within the UK migration regime, would allow London greater flexibility to identify and meet the city's skills requirements.

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13. The first step underpinning such a system would be for government to consider a '**Targeted Migration Area**' designation for the London Region within the UK Immigration system, accompanied by the introduction of a separate **Shortage Occupation List (SoL) for the capital**.
14. A separate SoL already exists in Scotland, and so there is precedent within the UK system for this degree of regional flexibility. Given that businesses are well placed to identify employment requirements and gaps, we believe that London business groups, working alongside the office of the Mayor of London, could devise and conduct an **annual London skills audit**. Such an audit could assist the national Migration Advisory Committee in administering London's SoL.
15. LCCI views the introduction of a separate London Shortage Occupation List as a sensible first step towards a more flexible migration system for the capital.

16. Capital Work Permits system

17. To ensure that London is able to meet its unique skills requirements once the UK leaves the EU, LCCI's key recommendation within our Permits, Points and Visas report is the introduction of a '**Capital Work Permits system**'.
18. We suggest that London's leading business groups and the office of the Mayor of London could form a '**Work Permits Sponsorship body**'. This body would be licensed by UKVI to act as a broker with London employers on **Certificates of Sponsorship** and with non-UK applicants for work permits. It would issue Certificates of Sponsorship and Capital Work Permits under entry criteria specified by the Home Office. To be issued with a 'Capital Work Permit' the applicant would be required to have a valid job offer with a London based employer and would only be permitted to work within London's 33 local authority area - which could be enforced by the addition of a signifying prefix to their National Insurance numbers.
19. Significantly, in addition to the requirement of a fixed term contract with a London employer, permit holders would be obliged to be resident in the capital for five years.
20. The number of permits that would be granted, and the prioritisation of applications for certain roles, would be informed, like a separate London SoL, by the annual London skills audit referenced in paragraph 14.

Question: How might the establishment of a regionally led immigration system impact, positively or negatively, on levels of integration?

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21. LCCI recognises the difficulty in reconciling an immigration policy that is reflective of concerns about the impact of migration but which also acknowledges and retains the vital contribution that migrants make to the UK, and London's, economy. We also know that business arguments citing the economic contribution of immigration can fail to resonate with members of the public anxious about perceived impacts on jobs, housing, healthcare and culture of local communities.
22. This is why LCCI has set out proposals for a more flexible system which allows London to determine its own skills requirements and maintain access to critical foreign workers, but which restricts these workers' ability to live and work elsewhere in the UK, helping assuage the concerns of other regions and communities outside the capital, whilst meeting London's economic needs.
23. This new 'regionalised' system, which could be open to applicants from both inside and outside the EU, would not, from the outset, define or discriminate arbitrarily between high or low skilled workers, or set limits on numbers. We believe that the number of permits granted - including, potentially, within a national cap - would be informed by the annual London skills audit. Ultimately, this system is designed to allow London Government (working with the Home Office) greater flexibility to identify what London's skills requirements are, to allocate permits accordingly.
24. Bringing these proposals to fruition would require London Government, specifically the Mayor of London, to be endowed with enhanced powers to identify and respond to the capital's immigration needs. However, we are clear that ultimately final decision-making power over UK immigration policy would remain with central government. Nonetheless, LCCI believes that a system whereby regions are empowered to set and enforce immigration policies, even with central government retaining final oversight, would make matters more locally accountable and provide a greater degree of transparency to local communities who may have concerns about migration into their area.
25. These proposals, encompassing greater local accountability and flexibility but retaining central government control, would also better reflect regional differences in priorities and outlook; not least that a majority of Londoners, and 28 out of the 33 London council areas, voted to Remain in the June 2016 Referendum.

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MCKEOWN, ARTHUR

Introduction

This submission is from Arthur McKeown, a Volunteer teacher of English at the Belfast Unemployed Resource Centre, in response to the All Party Parliamentary Group (APPG) for Social Integration's call for evidence for Stage Two of its inquiry into immigration and integration.

He is writing in a personal capacity, based on his experience in designing, documenting and delivering a Pre-ESOL programme for Absolute Beginners that has proved to be successful in meeting the needs of newly arrived adult migrants as they seek to build their skills and confidence in using English as they make their journey towards a successful transition to life in Belfast and beyond.

Arthur was born and brought up in Belfast. After university in Scotland and training as a teacher, he worked as a teacher of English as a Foreign Language, teacher trainer and centre manager on three different continents. The most significant element in his background is the four years (1979-1983) when he was the Director of the International House school in Tripoli, Libya. The school employed 20 teachers and delivered General English courses for up to 45 different nationalities on a variety of programmes. A significant number of the students were adult Libyans who needed a considerable amount of help, especially with reading and writing, before they could progress to a Beginner level General English programme. The principles, material and methodologies for teaching that were successfully used in Tripoli over a period of nearly 15 years have been adapted for use in the BELFAST Programme – ***Building English Language For A Successful Transition***.

www.arthurmckeown.com

Belfast Unemployed Resource Centre

The Belfast Unemployed Resource Centre has been in existence for more than 30 years. It is a charitable organisation whose objectives are to provide support, education / training and facilities to the unemployed and other groups suffering from social and economic disadvantage.

The organisation delivers programmes across Northern Ireland and in border areas to community groups, young unemployed, women in prison, families involved in the Juvenile Justice System and black and ethnic minorities. *Routes to Resilience* is a five year programme funded by the Big Lottery from 2016, enabling children and their families to strengthen relationships so that they can become participate more fully in the wider communities in which they live.

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For the last two years Volunteers (currently 30+ in number) working for the organisation have provided English language support:

- *English for Employability* for adult foreign nationals, so that they can better understand the job-hunting process locally, can create the paperwork required (CVs, application forms, covering letters, etc.) and can prepare appropriate responses to the questions they are likely to be asked at an interview.
- *English for Beginners* for those familiar with the Roman script
- *English for Pre-ESOL* for those unfamiliar with the Roman script; for example from Syria, the Horn of Africa.

All that is provided by the BELFAST Programme is free to the Learners.

www.thebelfastprogramme.org

1 English language provision

a) How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes be improved?

Syllabus

An accredited nationally agreed syllabus is needed for Entry 0 that can be used as a structured programme of work with adult Absolute Beginners who require help and support with understanding and using:

- The vocabulary, grammar and pronunciation of English at the most basic level, especially language for everyday life in the UK and Ireland
- The skills of listening, speaking, reading and writing
- The learning skills required to benefit from an Entry One ESOL course provided in a local college or language school.

The syllabus should be expressed as CAN DO statements, rather than in formal grammatical terms, and can be made available to Learners in their first language.

The syllabus used for the BELFAST Programme has a module description in the format that will be familiar to other teachers of ESOL who are working either in a church / community setting or in a college, (or similar) environment.

A documented procedure to guide Volunteers in the use of the syllabus ensures consistency in the Learner experience, especially when a number of different Volunteers are involved as Teachers in the delivery of the BELFAST Programme. Other procedures are in place to provide consistency in the way that the BELFAST Programme:

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- Recruits and inducts new Volunteers
- Keeps records of critical documents (Learner registration details, attendance lists, etc.)
- Provides training for Volunteers
- Arranges the provision of new stationery, teaching resources, etc.
- Creates and manages Personal Learning Plans for individual Learners
- Provides and monitors the use of Self Access resources and facilities.

The BELFAST *Absolute Beginners Compendium*

The BELFAST Volunteers draw on the *Absolute Beginners Compendium* to provide lesson inputs and further practice activities for the 60 hour programme (ideally 6 hours per week for 10 weeks). The *Absolute Beginners Compendium* is a substantial set of photocopiable material, written by Volunteers in Belfast, that can be used by individuals and small teams of Volunteers to introduce, practise or revise significant areas of English language.

Each Learner gradually compiles such worksheets, etc. as a portfolio of their English language skills that can be presented as evidence of achievement when they apply for an Entry One level course at a local college, etc.

Each Learner also uses exercise books to trace, copy and produce examples of their handwriting and an A6 indexed notebook in which they compile their personalized dictionary of key vocabulary.

Self Access Centres

Material for self study and autonomous learning is provided in local libraries, community centres and church halls. Examples include:

- Grammar practice at a range of different levels
- Vocabulary practice at a range of different levels
- Dictionary skills
- Extensive reading
- Guidance on job-hunting in Belfast
- Information about the city and events in the local environment.

Individual Learners are provided with Personal Learning Plans (based on a diagnostic language test and a short interview with an experienced Teacher), so that they can make the most effective use of the material and their study time.

Training is provided both for the Learners who make use of such resources and for the Facilitators who make the resources available and monitor their use.

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Sector-specific language practice

The BELFAST Programme has built up a library of resources to help job-hunters in Belfast to acquire confidence in using the language, especially the vocabulary, that is specific to different types of employment; for example: hospitality and restaurants sector, office work, hospitals and care homes.

As part of this offering we are also able to provide language training related to areas such as food safety, health and safety at work, etc.

Building contacts for employment and enterprise

Volunteers have sometimes being able to identify, through their own contacts and networks, opportunities for adult foreign nationals to move into employment or to consider starting their own small business, following an enterprise development portal that has been used successfully with native speakers for many years.

Community of practice

An online community of practice is growing in Moodle where those involved in the delivery of ESOL locally can share resources and best practice.

Such resources should take account of the need to observe important principles, including:

- The syllabus should be granularised, so that the syllabus is delivered in small digestible chunks of language that can be used immediately in the wider environment outside the formal classroom
- Material should be localised, so that Learners see references to (and pictures of) people, places and events that are becoming familiar to them in the community where they have come to live and build their lives.

The 30+ Volunteers are united in a passionate commitment to make Belfast and beyond a more welcoming place for adult foreign nationals. Some are young and are seeking opportunities to practise and develop their skills as teachers of English, perhaps before they move abroad to work; others are more mature and seek to give something back as they move into retirement.

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b) What role, if any, should central and local government, businesses, and service users play in the funding and delivery of these initiatives?

Volunteers regularly look for and get donations and gifts that can help with the further development of the BELFAST Programme.

No public funding has been received to date to support its activities.

We are currently seeking support in several ways:

- Computers and wifi

Learners sometimes have mobile phones but can benefit from having online access at home.

- Sponsorship

We are beginning to make some progress with finding work shadowing and employment opportunities for some of the Learners.

- Funding

Some potential sources of grants and funding have been identified and are being written for submission.

c) What are the advantages and disadvantages of college-based ESOL provision and community-based English language programmes, respectively?

Advantages of College-based ESOL provision

Formal structures and pathways leading to nationally recognised qualifications (both English and vocational)

Infrastructure for student support

Meeting the expectations of some Learners

Disadvantages of College-based ESOL provision

Class size

Some Learners may be challenged by the presence of strangers, especially if there is a wide range of nationalities and languages in the same teaching group.

Intimidating environment

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Some Learners may be challenged by the surroundings they encounter when entering a formal college environment.

Advantages of community-based English language programmes

- Community-based English language programmes provide a welcoming, empathetic and holistic approach to help adult foreign nationals to get started with new lives in Belfast and beyond. Individuals gradually acquire the confidence as they move along their journey to education, employment or enterprise. Such an approach is resource-intensive, based to the various skills, talents and (considerable!) commitment of the Volunteers.
- Volunteers on the BELFAST Programme can provide some one-to-one and pastoral support for individual Learners, some of whom have medical or emotional constraints when they enter the classroom.

In some cases it has been possible to signpost Learners to further language practice opportunities that are available through EmbraceNI www.embraceni.org.

That said, members of the Volunteer team are aware of a clear line of demarcation between the language support they provide and the work that is done and professional services provided by key workers from organisations such as Extern, Red Cross and Barnardos.

- Where necessary or appropriate, individual Learners (or small groups of Learners) with particular needs can be given additional support by members of the volunteer team; for example: vocabulary practice, grammar practice, handwriting practice, reading practice.

Disadvantages of community-based English language programmes

- *Dependence on Volunteers*

It can be challenging to manage the provision of sessions for Learners that depends on the availability of Volunteers, especially if the Volunteers have work-related, family or caring responsibilities that mean that (sometimes at very short notice) they may not be available to meet commitments they had previously made.

- *Lack of funding*

- though this is being addressed.

2 Barriers to participation

- a) What are the most common barriers to participation in English language classes?

Complex needs

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Adult Learners may have complex needs, resulting in the need to balance the provision of not only the face-to-face classes but also related transport, childcare services, etc.

Insufficient awareness of the provision of ESOL in the local community

Word of mouth is an important medium for alerting members of different communities of foreign nationals of the provision of arrange of English language classes and programmes.

We have had considerable success in making use of WhatsApp to provide online support and messaging for our Learners. Occasional messages in 'foreigner friendly English' can be used to encourage current and past Learners to invite their family, friends and other contacts to sample the BELFAST Programme.

Location of classes

Some Learners are unwilling or unable to pay the costs of public transport. They therefore appreciate face-to-face classes that are within reasonable walking distance of home, especially at night or in bad weather.

Learners in Lurgan have depended on the provision by local churches and community groups of minibus transport to bring them to the face-to-face classes.

Timing of classes

Morning, afternoon or evening classes have been provided for different presentations of the BELFAST Programme.

Classes normally last for 2 hours, three times per week, for ten weeks: total 60 hours.

Such timings suit the personal circumstances of some individuals - but not everyone. Some Learners with children at school like morning classes, especially if they can come after they have left children at school and then collect them after the English language class is over.

Childcare

Many Learners have young children who are not yet old enough to go to school. Appropriate crèche and childcare facilities, Staffed by an appropriately qualified people, need to be in place. It is also necessary to make arrangements for similar cover on days when local primary schools may have training days for staff; primary school age children may then be accompanying there parents to the English language class were the parents will be absent to look after the children at home.

Provision of gender-specific classes

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Generally, the BELFAST Programme is provided for mixed groups. Some women prefer to be in a class where they only meet other women. Volunteers working on the BELFAST Programme have experience of providing English language courses for mature women only at the Belfast Islamic Centre.

Appointments

The teams of Volunteers for the delivery of the BELFAST Programme are made aware at Induction of the need to ensure that any language points or material introduced in a lesson is revisited and used again for consolidation, revision or further practice activities, so that individual Learners who may have medical, dental or other appointments or not disadvantaged.

Team-working by Volunteers is an asset here, as the Learners are unaware how much repetition they are getting to reinforce new language and skills if the presentation stage, controlled practice stage and production stage have been done by different Volunteer teachers in different lessons.

Cultural sensitivity

Volunteers working on any aspect of the BELFAST Programme are made aware at Induction of the need to be sensitive to cultural issues; we use the acronym *PARSNIP* to alert Volunteers to the need to avoid references to anything that could be regarded as insensitive or inappropriate: *politics, alcohol, religion, sex, narcotics, -ISMs of different sorts and pork*.

b) How can these be overcome?

Regular information sharing and liaison with foreign national communities

For example, through shops regularly used by foreign nationals.

Regular information sharing and liaison with statutory bodies

For example, Housing, Police, Hospitals, Schools

Effective – and more - use of social media

Signposting to other language practice opportunities

Learners can be actively signposted to other opportunities for English language conversation and practice that may be available in their local community, especially when these complement the more formal provision and practice in a classroom environment.

Sourcing suitable venues for the face-to-face classes

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The venue used for the delivery of the BELFAST Programme in Lurgan has not only spacious and suitable classrooms but also a range of other facilities onsite:

- The men's shed
- The community garden
- The thrift shop
- The crèche facilities
- The café

- all available under the same roof in the building where the English language teaching is provided.

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MIGRATION YORKSHIRE

Introduction

1. Migration Yorkshire is the regional strategic migration partnership (RSMP) for Yorkshire and the Humber. Migration Yorkshire works with national government, local government and others to ensure that Yorkshire and Humber can deal with, and benefit from, migration. We work with agencies across the statutory, voluntary, community and private sectors to help support the delivery of high quality services to migrants in a way that benefits everyone living in local communities.
2. We welcome the opportunity to respond to this inquiry into how the UK's immigration system could promote integration. In this submission we have drawn on our experience of working with local organisations in Yorkshire and Humber as well as directly with diverse groups of migrants, including refugees, third country nationals, EU migrants, migrant Roma, and others. This response was also informed by consultation with partner agencies.

Summary

3. Migration Yorkshire believes that for new immigrants, integration should begin immediately upon arrival in the UK and should continue for as long as they remain.
4. Integration is important for the individual, but is also essential for the cohesiveness, prosperity and safety of everyone in local communities. Trading these things for a 'hostile environment' or in an attempt to enforce 'behaviour change' places significant risks on the individual and society.
5. We believe that integration policies should apply to *all* migrants, not only those defined as 'economic migrants'. Integration happens in local neighbourhoods regardless of immigration status and integration policy should reflect this practical reality of community life.
6. The government's current approach to ESOL is about getting people into work, but there are other positive impacts of ESOL related to health and wellbeing, independence and community cohesion. We would welcome a broader ESOL strategy that reflects the importance of English language skills beyond work that is linked to wider governmental policies including health, education or social care.
7. Regional devolution of immigration should be place-based, adequately resourced and enable local control with regional co-ordination.

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Detailed response

Principle three: Government must reassess its current 'one size fits all' approach to immigration policy

8. The EU referendum showed that the current immigration policies are seen as not working for everyone. Yorkshire and the Humber voted predominantly to leave the EU, with Remain winning in only 3 of 21 counting areas (York, Harrogate and Leeds)⁴⁴.
9. Our local councils indicated that they often feel they have to respond to local migration challenges without having any control over it, and are unable to show clear benefits for their local communities. While change needs to be made, it is imperative that policies are developed through discussion with local authorities and other stakeholders, to ensure that they work for all regions, including Yorkshire and the Humber.
10. In rethinking the 'one size fits all' approach to integration we share the APPG's view that integration covers economic, civic and social integration. We believe that integration policy should reflect different abilities, skills and needs migrants have and cover support in different areas – not only language, but also in understanding British values and culture, in accessing services and understanding our 'systems', having their qualifications recognised or in being welcomed into the local community.^{45,46,47}

Principle four: For new immigrants, integration should begin upon arrival in the UK.

11. Our position has always been that for new immigrants, integration should begin immediately upon arrival in the UK and should continue for as long as they remain. Integration is important for the individual, but is also essential for the cohesiveness, prosperity and safety of everyone in local communities and wider society. Trading these things for a 'hostile environment' or in an attempt to enforce 'behaviour change' places significant risks on the individual and society.
12. We believe that integration policies should apply to all groups of immigrants, including family joiners, refugees and asylum seekers, as the groups excluded from this inquiry's remit

⁴⁴ House of Commons Library (2016) *European Union Referendum 2016*

<http://researchbriefings.files.parliament.uk/documents/CBP-7639/CBP-7639.pdf>

⁴⁵ Integration up North (2015) *Introduction to Migration* series. Migration Yorkshire: Leeds.

www.migrationyorkshire.org.uk/introductiontomigration-iun

⁴⁶ A. Ahmed et al (2015) *Destination Integration: Third country nationals in the North of England: Final report* www.migrationyorkshire.org.uk/userfiles/file/projects/IUN/IUN-finalreport-Jun2015.pdf

⁴⁷ Migration Yorkshire (forthcoming) *Mapping services engaging with Roma communities in Barnsley, Doncaster, Rotherham and Sheffield*.

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are more likely to settle in the UK permanently⁴⁸, but some, such as family joiners, often require greater integration support⁴⁹. Integration happens in local neighbourhoods between newcomers and existing residents, regardless of immigration status or migrant group, and integration policy should reflect this practical reality of community life.

13. Economic immigrants are more likely to find the process of the integration easier by being exposed to British norms at their workplace⁵⁰. This is especially applicable to non-EU migrants, who must have a sufficient level of English and a job offer when applying for a work visa. The situation with EU migrants is more variable, as they come to the UK with a wide range of skills, from highly skilled to unskilled. ESOL provision and integration programmes should be tailored to cover the needs of all groups, as even highly skilled migrants might require additional support in navigating British health and legal systems, as their language and conversational skills might be limited to their specialist field of employment.
14. To enable integration from the start, new arrivals need a clear path and timescale to follow. Integration policies need to recognise different preferences and legal options for migrant settlement in the UK in the long-term. Settlement intentions are perhaps more predictable in relation to non-EU migrants (according to their visa conditions), but are more changeable for EU migrants in the current pre-Brexit context. Measures to encourage integration will inevitably be affected by policies that hinder the settlement process, such as the income requirement for Tier 2 visa holders and the recently announced 'safe return review' for refugees⁵¹.
15. The government's current approach to ESOL is work-focused⁵². While contributing through working and paying taxes is an important component of integration⁵³, there are other positive impacts of ESOL related to health and wellbeing, independence and community cohesion. We would welcome a broader ESOL strategy that reflects the importance of

⁴⁸ Home Office (2017) Statistics on changes in migrants' visa and leave status: 2015
www.gov.uk/government/publications/statistics-on-changes-in-migrants-visa-and-leave-status-2015/statistics-on-changes-in-migrants-visa-and-leave-status-2015

⁴⁹ A. Ahmed et al (2015)

⁵⁰ Ibid.

⁵¹ Home Office (2017) *Refugee leave*

www.gov.uk/government/uploads/system/uploads/attachment_data/file/597990/Refugee-Leave-v4.pdf

⁵² House of Commons Library (2017) *Adult ESOL in England*

<http://researchbriefings.files.parliament.uk/documents/CBP-7905/CBP-7905.pdf>

⁵³ A. Ahmed et al (2015)

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English language skills beyond work that is linked to wider governmental policies including health, education or social care.

16. The acquisition of ICT skills should be a component of the integration process for new migrants. The importance of ICT skills is becoming increasingly apparent, not only for the acquisition of English (with more resources and ways of learning available online), but also in the wider process of integration⁵⁴. More services are only available online (e.g. universal credit) and employers increasingly use social platforms to advertise jobs.

Specific questions: English language provision

How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes be improved?

17. ESOL provision should be a co-ordinated initiative which is planned and delivered with the appropriate stakeholders, including local authorities, businesses, schools, religious institution, third sector organisations and local migrant groups⁵⁵. This should enable better delivery and a clear pathway between college-based and community-based initiatives. All courses (including community-based ESOL) should be run by qualified ESOL teachers to enable progression and make learning more meaningful, especially for learners with no or very basic previous education.⁵⁶
18. ESOL courses should include the option of a local orientation module to ensure that new arrivals know about the communities they are going to be part of, and have the knowledge of local services and facilities in their new surroundings to help and assist with the integration process⁵⁷.
19. College ESOL courses should be more flexible, with options of online/self-learning. Learners should not be tied into specific classes, but given a choice of times and intensity, which fit with their routines and best suit their needs⁵⁸. Courses should be designed to start at various times in the year, as a limited number of enrolments during the year prevents new arrivals from accessing courses immediately if they arrive after the admission cut-off date.

⁵⁴ Information gathered by Migration Yorkshire in the role of regional ESOL coordinator for Syrian Resettlement and during our South Yorkshire Roma Project.

⁵⁵ Submission from a local authority in Yorkshire and the Humber, February 2017

⁵⁶ Information gathered by Migration Yorkshire in the role of regional ESOL coordinator for Syrian Resettlement

⁵⁷ Submission from a voluntary organisation, based in Rotherham, February 2017

⁵⁸ A. Ahmed et al (2015)

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What role, if any, should central and local government, businesses, and service users play in the funding and delivery of these initiatives?

20. ESOL funding should be longer-term to enable stakeholders put together programmes that work for their communities and facilitate their integration. A lack of continued and stable funding streams disrupts progression routes into further education, training and work⁵⁹.
21. Some local authorities in the region believe that employers should contribute to the provision of language classes for migrant workers, especially when they recruit directly from abroad⁶⁰. Migrants employed in low-skilled jobs, especially in sectors with a high percentage of the migrant workforce such as agriculture, food production, hospitality, social care and construction, have the poorest proficiency in English⁶¹.
22. The role of local authorities should be to liaise with relevant stakeholders⁶² to coordinate provision of ESOL, identifying premises for delivery, and to compile and maintain a directory of classes/groups, but not to contribute to ESOL funding.

What are the advantages and disadvantages of college-based ESOL provision and community-based English language programmes, respectively?

23. These are summarised in the following table:⁶³

⁵⁹ J. Simpson et al (2011) *ESOL neighbourhood Audit Pilot (Harehills, Leeds): Methodological Toolkit* www.education.leeds.ac.uk/assets/files/research/cler/ESOL-neighbourhood-audit-pilot-methodological-toolkit-May-2011.pdf

⁶⁰ Submission from a local authority in Yorkshire and the Humber, February 2017

⁶¹ Migration Advisory Committee (2014) *Migrants in low-skilled work: The growth of EU and non-EU labour in low-skilled jobs and its impact on the UK*, p.240
[www.gov.uk/government/uploads/system/uploads/attachment_data/file/333083/MAC-Migrants in low-skilled work_Full_report_2014.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/333083/MAC-Migrants_in_low-skilled_work_Full_report_2014.pdf)

⁶² Such as schools, colleges, businesses, religious institutions and third sector organisations.

⁶³ Information gathered by Migration Yorkshire in the role of regional ESOL coordinator for Syrian Resettlement, South Yorkshire Roma Project and Integration Up North.

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	Advantages	Disadvantages
College-based ESOL	<p>More structured lessons and clearer ESOL progression path for learners</p> <p>Certificate upon completion (the key to further study and employment opportunities)</p> <p>Formal initial assessments so learners places with others at the same level</p> <p>Delivered by qualified teachers</p>	<p>Too formal as even the lowest level requires literacy and basic education</p> <p>Requires regular attendance and ability to commit from the learner</p> <p>Childcare rarely available</p> <p>Enrolment once/twice a year</p> <p>Fee exception linked to specific unemployment benefits</p> <p>Often delivered far from the learner</p>
Community-based ESOL	<p>Affordable</p> <p>Provide language for everyday use</p> <p>More informal, allows for flexibility e.g. parents can bring children with them</p> <p>Often delivered in the community settings, without the need for travel</p> <p>Availability of pre-entry and pre-pre-entry ESOL classes</p> <p>Culture sensitive provision, i.e. availability of women only classes</p> <p>Allows other 'soft benefits', i.e. making friends, building confidence, reducing isolation, increasing wellbeing</p>	<p>Often delivered ad hoc and for a short period due to lack of funding</p> <p>Often a low number of hours per week</p> <p>Some, more conversational, might not have formal progression</p> <p>Often no formal initial assessment, mixed abilities in same class</p> <p>Often delivered by volunteers with no qualification in ESOL teaching</p> <p>Women often have children with them which can hinder learning</p>

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Specific questions: barriers to participation

What are the most common barriers to participation in English language classes?

24. From our experience, the most common barriers to participation in Yorkshire and Humber include:

- Oversubscription of affordable courses
- No childcare provision
- Strict criteria applied to enrolling on college-based programmes (i.e. free ESOL classes only available to the unemployed, so are unavailable to housewives, for example)
- Work commitments / few classes outside of normal working hours
- Few community settings
- Illiteracy/no education in first language
- Cultural/religious barriers (i.e. women-only classes)
- Lack of co-ordination/knowledge about provision available.

How can these be overcome?

25. Proposed solutions are reflections from our past and current projects⁶⁴, and suggested in our consultation with local stakeholders in the region:

- Co-ordination and regular review of available provision
- More effective communication and stronger links between stakeholders
- Classes run in early learning settings to maximise uptake of free childcare
- Loans for ESOL learners to pay fees
- More workplace-based ESOL, delivered around working hours at employer's premises
- Sharing good practice in coordinating ESOL, such as MESH project in Leeds.⁶⁵

Specific questions: devolution of immigration policy

To what extent could some of the responsibility for immigration be transferred to devolved governments, metro-regions, Local Enterprise Partnerships, or groups of local authorities?

⁶⁴ Syrian Resettlement Programme, South Yorkshire Roma Project, Roma MATRIX, Integration Up North, Roma Source.

⁶⁵ Learning English in Leeds (2017) *About us* www.lel.help/index.php/about/about-lel

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26. Yorkshire and Humber has a long and strong history of regional cooperation and implementation of migration policy, often providing a leading role nationally. Our region has an effective and widely respected structure for dealing with migration and regularly requests further control over immigration from government.
27. We support the devolution of some of the responsibilities for immigration. This does not need to be a 'one size fits all' approach and would reflect considerations including the range of devolved structures in the UK, existing migration structures, the preferred system of local authorities, and the desire and ability to manage devolved immigration systems.
28. Regional devolution of immigration should be place-based and enable local control with regional co-ordination. Devolved structures at a regional level are well-placed to connect migration to other strategic developments focused on the geography of a place, a common view of deprivation, skills and economic regeneration plans. The impacts of migration could be better managed through a dialogue with communities, and the resources developed are more likely to be more appropriate, more efficient and therefore more effective, as they would be directly targeted to specific places.
29. As the Regional Strategic Migration Partnership (RSMP) in Yorkshire and Humber we recommend careful implementation of any new system, with the full involvement of all stakeholders. If devolution is to allow regions to be able to manage migration better, the system would need to be transparent, accountable, have genuine powers and be sufficiently funded by central government to be able to anticipate and deal with the impacts of migration. It would need to be flexible, able to adapt to the different contexts in each region, and avoid creating inequalities between them i.e. by ensuring each region takes its fair share of migrants arriving through different routes and programmes, including asylum seekers and resettled refugees.

How might the establishment of a regionally led immigration system impact, positively or negatively, on levels of integration?

30. A regionally-led system could enable local authorities and RSMPs to take a more active part in dialogue on migration in local communities. It would enable a better response to local migration challenges, such as geographically-specific shortages in skills and housing, allow for smarter application of migration data and other evidence to identify needs and gaps in the workforce, prevent migration to localities under particular socio-economic pressures, and to lessen any negative impacts of migration by ensuring local services have capacity to increase their client base.
31. A regional system would also enable each region to balance the local context with different programmes where central government asks for our support, such as: asylum dispersal, the

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national transfer scheme, the Syrian VPRS, 'Dubs' and Dublin III arrivals, to name a few of the recent schemes we have supported.

How might it impact on the political and public debate on immigration issues?

32. There is potential for immigration to be seen as a solution to local issues (i.e. addressing skills gaps) and reflecting public goodwill towards vulnerable migrants (i.e. resettled refugees). A regional approach could help to counter myths around immigration, with a system based on local context rather than generalisation of the issues to every location, and improve community cohesion and community tensions, if policies to be co-produced and co-managed with local communities.
33. However, as already stated, it is vital for a regional system for be transparent, accountable and evidence-based, so that local residents are informed and included. A positive local debate would also require adequate funding and processes to promote the integration of migrants and evidence the benefits of migration in the local area.

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MUMS AND FAMILIES (MAF)

Introduction

1. MAF is a small charity that aims to tackle issues of community cohesion/social integration in one of the most ethnically diverse constituencies in the country: Hall Green in Birmingham. Recently noted as an area in which there have been numerous terrorist related arrests, Hall Green encompasses the communities of Sparkhill and Sparkbrook, which have a Muslim majority population made up of immigrant families from countries including Pakistan, Bangladesh and Somalia.
2. MAF provides a programme of events to which families, mums or carers of primary school aged children have an opportunity to converse freely with those from different cultural, religious or racial backgrounds to their own with the aim of developing respect, understanding and toleration of each other through the medium of “learning about each other, from each other ...”. Events usually have a core cultural or community theme enabling attendees to share and learn about each other’s culture, food, or customs etc. Active steps are taken to encourage dialogue between those who would not otherwise be included to speak to each other. The programme of events is run both within schools and outside in the local community.
3. By enabling mothers and carers to have the confidence to converse and interact with individuals who are different to themselves, not only will they themselves benefit but their children will develop a better understanding of the values and lifestyles of others, and consequently be better able to interact with people from a wider range of backgrounds in their future studies and careers.
4. Although in existence as a group for a number of years, MAF has only recently gained charitable status and is planning to open a small office soon, in cooperation with the local Quaker Meeting, to enable it to develop its activities further.

Sources of Information

5. Through its activities MAF has contact with a large number of women from Muslim immigrant backgrounds. It held a discussion group specifically around the issue of ESOL provision for the purposes of this evidence paper. Soundings were also taken from some individual women interviewees. The remainder of the information comes from interactions and conversations that have taken place during the charity’s activities and events. Finally, the writer is also a Trustee of the Muslim Women’s Network UK, and some of the information set out in this paper derives from discussions with fellow

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Trustees/staff at that charity, including the Chief Executive who manages the MWN Helpline.

Response to Questions

6. Due to the nature of its work, MAF is unable to comment in any detail on the issue of Devolution of Immigration Policy (question 3) and drawing on international examples (question 4).

English Language Provision

7. Quite clearly, in areas of greatest need, there is a dearth of ESOL provision. With the withdrawal of funding for such classes there was a drastic drop in terms of accessibility which is still being felt. MAF does not often work with those who have immigrated to the country recently, but instead has contact with many individuals (mainly women) who fall into one of the following groups: -
 - a) Those who've been in the UK longer but have failed for one reason or another to integrate despite wishing to do so;
 - b) Those who have arrived to family support in the UK and who either do not themselves perceive the need to integrate or are discouraged from integrating by their families.
8. One interviewee, a (Muslim) former primary school teacher who has recently taught ESOL, reported that at the first class she was due to teach, which was scheduled for eight students, 19 students attended, only one of whom was male. Due to cultural sensitivities she asked the male to leave the class as she knew that if he remained many of the women would have dropped out. This anecdote is notable for two reasons: firstly the huge oversubscription for the class; and secondly, the fact that in order to deliver more effective outcomes (i.e. more people being taught) she had to take what many may have thought to be an unfair decision towards the male student.
9. What is reported to us is that in the Muslim families we interact with (and this is a fact clearly observable at parents evenings at local schools) the men are likely to be better at English language than their wives as it is the father who goes out to work and whose English necessarily improves: if – as often happens – the wife is at home, living, socialising and shopping within a community where she does not need to speak English, there is no incentive for her to learn.
10. In areas such as Hall Green there is concern that agendas, discussions and policies on issues relating to minority communities are London-centric and out of touch with the reality of what happens in the regions. For example, in a relatively middle class area of

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Birmingham (at the opposite end of the Hall Green area to Sparkbrook) with a more ethnically diverse population including Muslim Pakistani families that may be perceived as more integrated, around 50% of the Muslim women were either born outside the UK and brought into the country as a spouse, or were born in the UK, with their spouses being brought into the UK upon marriage. The marriages were usually arranged by the families and in some cases were forced. In either case, the familial pressure not to integrate can be overwhelming. However when these matters are discussed at a national level, the perception is that immigration through such routes and/or forced marriages and/or family pressure is a relatively uncommon phenomenon: it's not. In our local area it's part of everyday life.

11. Relating these points back to the issue of English Language Provision and in particular Principle 4, it's MAF's view that yes, new immigrants should have immediate access to English and integration classes (particularly including sections on the principles of non-discrimination against women alongside other cultural aspects of life in the UK) however this should not be developed as purely a process for new immigrants, but instead should incorporate elements or modules that can be taken up by immigrants who have been living in the UK for some time but who have failed to develop the skills needed to integrate well.

ESOL Provision and Barriers to Participation

12. This paper addresses these two points together as in some respects they overlap. MAF's view is – understandably given its remit – informed from the perspective of women in relatively inward looking immigrant populations. When looking at what role governments (central and local) should play and/or business or community groups in funding and provision of English classes, MAF has no concluded view other than that to be effective in immigrant communities a national policy or programme, without significant local input, will be costly and probably less effective due to perceived barriers i.e. 'it's official therefore it will be costly, and I don't want to be seen doing something so divorced from my own community'. This is different to the situation for new immigrants, where a more tightly controlled programme is likely to need significant input from local government at least.
13. In terms of the barriers to participation, one interviewee (Muslim of Pakistani descent) summed up the difficulties by noting that within the Muslim community locally you get the "*coconuts*" on the one hand, fully integrated and not necessarily practising their faith; then in the middle, the vast majority or normal Muslims who are "*bumbling along*", getting on with their lives, happy trying to reconcile their faith as they want to practice it against the general UK cultural background, and then the "*unreachables*" who have community, cultural or familial rules that meaning that further integration is deemed

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unacceptable or unwelcome. The 'unreachables' in this scenario are the individuals who need to be targeted.

14. MAF's dedicated discussion group on accessibility/barriers to ESOL spoke generally around the issues of cost, location, childcare and opportunity to attend (personal). This corresponds with the views of the MWNUK that 'safe' spaces for English lessons need to be considered. The women speaking directly to us were slightly more reticent to use the word 'safe' but in practice it amounts to the same thing: they effectively need to have venues and timings to participate that can be incorporated into their daily routines so as to include some sort of provision for childcare. This need not be full childcare: conversational classes in a 'play and stay' setting was noted as one acceptable solution (and one that MAF is going to be setting up as a consequence of the discussions held). One reason for their wish to have locally based, free or very cheap conversation classes where child care was available is obvious: mothers on limited incomes with small children will of course find it difficult to access centrally located formal, fee paying college classes. The other reason is slightly more subtle but came across from the MWNUK, the interviews and the discussion group alike, that if they could attend a class accompanied by their with smaller children, whilst their older children were at school and their husbands are at work, their families would not notice and/or be inconvenienced, and they would not be criticised or prevented from attending. Further, given that – as MAF well knows - some husbands are reticent to allow their wives to participate in activities where there may be contact with non-related men, it is imperative that the sessions are for women only. Although from the perspective of equal rights this seems wrong or counterproductive, taking the line of least resistance at this stage, allowing women the means to integrate better – participate in their children's school lives and feel confident to shop and access services outside their local area – is ultimately going to mean that they and their children feel more integrated into the cultural life of the UK.
15. Certainly MAF has identified as the common thread by which different groups (of parents) can be brought together is the desire of all to see their children succeed. This is why it is of the view that the best place to hold such classes would be schools (either at, or close to (but with the support of) the school). MAF had pretty much the same response on this point from all interviewees/participants in discussions. MWNUK has this at the top of its list of 'safe' spaces, alongside Sure Start centres (such as still exist after the funding cuts), libraries and churches/church halls (although ironically, not mosques many of which have not developed the community centres, rooms for hire etc that local churches have).
16. MAF is also of the view that education of children within schools could be married up with a school linked language initiative for mothers/carers. Schools are obviously under

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a duty to promote British values, but giving parents/mothers some information about what their child is being taught about this subject could help promote discussion and learning within the home environment that may otherwise be lacking.

17. One interviewee considered the content of such courses: how to fill in a job application; how to make a doctor's appointment; how to use public transport; how to access other services e.g. mental health. The bottom line, she noted, was the aim of giving individuals the springboard of language by which they could access jobs and opportunities. Although possibly constrained by familial/cultural/community rules, once given the means to broaden their level of interaction it is likely that levels of integration will steadily increase.
18. The other issue that arose strongly in discussions about integration generally is the need to address the problem from all directions and not just place the onus on immigrants. MAF believes very strongly that integration is a two way street, and that immigrants cannot be required to forfeit their culture, religion or way of life because some within the indigenous population want them to do so. If the language and integration programme is going to be effective, there has to be some involvement from people outside their own communities: if the only interaction the immigrants get with anyone outside their community is with an English teacher and their GP the integration process will be much slower and less effective.
19. It is noted that the Casey Review was critical of 'sari and samosa' type events, and it's easy to see why: the level at which knowledge and information is exchanged at such events tends to be superficial and somewhat voyeuristic without being geared to forming real bridges between individuals. It seems that the success of projects such as Stepney City Farm Open Volunteers and Together (referred to in the Interim Report) would seem to be at least partially based on the fact that the contact goes both ways. From this it's clear that to work effectively any language/integration type policy or programme will have to be planned to incorporate some involvement (not just input) from people who are not immigrants, who are culturally integrated, and who have good language skills.
20. In terms of administration as noted above, the more centrally controlled the initiative is, in MAF's view, the less likely it is to be effective. Local authorities would – a few years ago – have been in the best position to oversee such programmes, as they would be able to ascertain local need and target resources appropriately. It is obviously the case now that imposing such a burden upon local authorities would not be feasible without their being empowered to set aside or receive dedicated funding for the purpose.

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Devolution of Immigration Policy

21. MAF is not in a position to make anything other than a passing comment on this issue, but in summary it seems that to devolve responsibility for an issue of such national importance as immigration to local government would lead to further polarisation between those areas with large immigrant populations and those where there are few immigrants. The Canadian precedent is interesting, but the provinces to which it applies are huge compared to UK local authority regions. The rationale for a large Canadian province being able to direct immigrants to areas where there are labour shortages etc is clear: allowing Birmingham CC (or the metro-region) to decide whether immigrants should live in Olton rather than Sparkhill seems a little pointless due to the small geographical area involved, and the relative lack of diversification between communities within the Birmingham CC area. The 'Welcoming Communities' initiative would appear to be similar in approach to what Scottish councils are doing already (as referenced in Interim Report, p.14). Alongside this it would be sensible for the national management of controlled immigration to have a formal mechanism included in the process to take enable local authorities' needs to be advocated and taken into account.

Sophie Garner

Chair,

Mums and Families

17 March 2017

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NATIONAL ASSOCIATION FOR TEACHING ENGLISH AND OTHER COMMUNITY LANGUAGES TO ADULTS (NATECLA)

NATECLA is a registered charity and the only independent national forum and professional organisation for ESOL practitioners in the UK. NATECLA is leading the call for a national ESOL strategy for England and has formed a steering group to take this forward. For more information about our work and our vision, please visit [our website](#)

How might ESOL provision be improved?

Our submission to this APPG reflects the five principles laid out on p.15 of our document [Towards an ESOL strategy for England](#), which we launched in October 2016. We firmly believe that having a national strategy for ESOL will help to ensure:

- **‘inclusion’**- that everyone who needs ESOL can access it
 - **‘participation’**- that ESOL learners will be enabled to participate in society
 - **‘progression’** – that learners are able to improve their life chances through access to ESOL provision.
 - **‘equality’**- that migrants with ESOL needs are valued in society
- and
- **‘quality’**- that ESOL provision is high quality and cost-effective

A strategic approach would offer a framework for all ESOL stakeholders and a way of measuring outcomes through regular reviews. Without a long-term strategy the country risks replicating decades of uncertainty, where funding and eligibility rules reflect the ambivalence of successive governments towards immigration.

Our proposals for what should go in a strategy are laid out on p.2-3 of the document and also well summarised in the recently produced [parliamentary briefing on ESOL](#). They were produced as a result of extensive consultation with ESOL stakeholders as well as research into pre-existing reports and articles.

Role of central and local government, businesses and service users

Local government

Key to achieving successful provision, we believe, is establishing local hubs which map, co-ordinate, quality assure and signpost learners. There is scope for building on effective practice from those that currently operate throughout the country, two of which are presented in our report: *Basic Educational Advice and Guidance in Nottinghamshire (BEGIN)* and *Learning English in Leeds*.

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Local authority hubs must also promote cross-sector working to ensure a holistic approach, to maximise resources and be as inclusive as possible. An example of what can be achieved is the recent [Manchester Adult ESOL strategy](#), which used our own strategy document as a source. Other examples of this approach can be seen in the work of the 12 regional coordinators for the [Syrian Vulnerable Persons Resettlement Programme](#). Funded by the Home Office and the DfE, they are currently mapping ESOL provision nationally and identifying gaps. If this work could be sustained and developed beyond the 6-month limit for the project this would be of great benefit to migrant communities, since ESOL hubs serve as disseminators of innovation and good practice and ensure that provision matches local need. In the case of the regional coordinators it would ensure that the lessons learned and resources developed by short-term initiatives are maximised and sustained.

Matching local needs requires a range of responsive provision and support structures. For instance, newly arrived, traumatised refugees often need informal provision in a safe setting, without pressure to do exams. Migrants with no or low levels of literacy need extra support as do learners at or below Entry level 1. At higher levels, learners with good study skills would benefit from fast-track blended learning approaches which may be vocationally oriented and include vocational ESOL courses.

Migrants in rural areas with childcare needs and/or who are housebound may best be served by a voluntary home tutor scheme. [Merton Home Tutoring Service](#) is an excellent example. As with all good voluntary schemes, MHTS ensure that learners progress as soon as appropriate and feasible onto mainstream college or community-based courses taught by qualified teachers. NATECLA is working with NAVTE (National Association of Voluntary Teachers of English) to develop a code of practice for volunteers working in ESOL settings. It is important to stress that although volunteers can provide valuable support in relation to supporting language learning, this cannot replace the quality and effectiveness of ESOL programmes taught by fully trained and qualified teachers.

Businesses

Questions around the role of employers in supporting employees with ESOL needs generated the second highest number of written comments in our consultation about a strategy (p.14). The general consensus was that employers should be encouraged to choose from a range of options for supporting employees who need ESOL and that unions should be closely involved. Some examples can be seen in our [blog for TUC Unionlearn](#) with whom we are currently working to develop a framework for employers. Consultation is essential to ensure the appropriacy of any initiative in a workplace setting.

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Another project run by 'Talk English' involves the provision of training for local businesses and public services to increase ESOL awareness amongst teams of staff from those businesses and training them as 'sympathetic listeners'.

Central government

The 'infrastructure' for a quality ESOL service can only be provided by central government. A curriculum, qualifications for learners, qualifications and CPD (Continuing Professional Development) for teachers need to be co-ordinated centrally. There is much to build on from the *Skills for Life Strategy* in the early 2000s which included ESOL. NATECLA has recently worked with the Education and Training Foundation to restore ESOL materials on the Excellence Gateway, but these need updating.

Barriers to participation

- Availability of provision - funding for ESOL has reduced by 60% since 2009 (see *House of Commons Research Briefing*). Recent targeted funding such as through the DCLG (Department for Communities and Local Government) has been very welcome for those learners it has benefited, but it is short term and only targets certain groups. EU funding (European Integration Fund (EIF) and the Asylum, Migration and Integration Fund (AMIF) has played a crucial role in helping providers to run holistic ESOL focused integration programmes which can engage and support migrants, particularly women, who might otherwise be disenfranchised. Many newly-arrived migrant women with spouse visas are unable to access SFA funded provision for the first three years. However, EU funding is for short-term projects; what is needed is sustainable funding so that colleges and other providers can plan long term.
- Level of classes - frequent changes in funding methodology, sometimes with very short notice, make provision of courses for Entry 1 and those learners with little education and basic literacy needs particularly problematic. There are no funded qualifications at the lowest level and more favourable funding is attached to fast-track, higher level qualifications. This results in a disincentive for providers to cater for the lowest level, high-needs learners which, in fact, should be a priority.
- Eligibility - eligibility currently favours those who are seeking employment. Only those in receipt of work related benefits are eligible for free classes. Others can obtain 50% subsidy if they can demonstrate that the course will lead to employment. This system seriously disadvantages those who are in very low paid work or are unable to work such as women with young children. For the pressures on women in particular, see 'Why refugee and migrant women aren't able to learn English & what we can do'

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As those who are in low-paid employment probably have sufficient English for the work they are being employed to do, their employers will not pay their fees. However, if employees were funded and supported to improve their English in order to obtain better jobs, this would be good for the UK's skills base and good for integration as they would be better able to support their families and participate in community and civic life.

As a result of Brexit, newly-arrived EU nationals are likely to have to pay high overseas student rates.

- Difficulty of navigating local provision and eligibility rules - it is at the discretion of providers whether to waive fees. For instance, many do so for asylum seekers who are not allowed to access classes until 6 months after they have made their claim and at which point they have to pay 50%. The different rates charged by providers can be very confusing for learners. A local hub such as *BEGIN* can offer valuable support (see above).

For more details of barriers to participation, please refer to our strategy document-

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TUC Unionlearn blog: Learning Support for Workers (casestudy)
<https://www.unionlearn.org.uk/blog/do-some-employees-you-represent-need-improve-their-english-if-so-please-read-we-need-your-help>

Talk English <http://www.talk-english.co.uk/introduction/talk-english-here/>

Wonder Foundation report: *Why refugee and migrant women aren't able to learn English & what we can do* <http://www.wonderfoundation.org.uk/RefugeeESOLReport>

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REFUGEE ACTION

Refugee Action is a national charity which works to enable asylum seekers and refugees in the UK to rebuild their lives. We are the leading provider of reception and integration services for resettled refugees in the UK, and we provide advice and support to thousands of asylum seekers and refugees every year.

We also campaign with a wide range of partners to achieve change; and are currently campaigning on English language provision for refugees through our Let Refugees Learn campaign⁶⁶.

Importance of English to integration

Every day, Refugee Action works with refugees who are determined to learn English. They know that learning English, more than any other factor, is the key to them being able to build successful, independent lives in the UK.

Without it, they are unable to find work, study, volunteer and become part of their local community; and undertake everyday tasks such as going to their GP or talking to their children's teachers.

These insights are mirrored by widespread and growing recognition that English language teaching is the single most important contribution to refugees' and others' ability to integrate; and that society as a whole benefits.

In December 2016, Dame Louise Casey's review for the Government on integration and opportunity⁶⁷ highlights that 'in relation to integration and economic success, one factor that stands out strongly as a barrier to progress is proficiency in English'. Her report emphasises the strong links between English language skills and further education, qualifications and employment rates; and the importance of women being able to speak English.

The Casey review's recommendations to the Government include further funding for English language classes, both for Adult Skills Budget funded and community-based learning.

⁶⁶ http://www.refugee-action.org.uk/campaigns/let_refugees_learn/

⁶⁷ 'The Casey Review: a review into opportunity and integration', Department for Communities and Local Government, 5 December 2016 - <https://www.gov.uk/government/publications/the-casey-review-a-review-into-opportunity-and-integration>

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The Casey review was swiftly followed in January 2017 by the APPG on Social Integration's interim report⁶⁸, which noted 'speaking English is the key to full participation in our society and economy', and urged the Government to markedly increase funding for English for Speakers of Other Languages (ESOL).

These reports build on the already widespread consensus on the importance of English language provision for all categories of migrants in the UK. Government research^{69 70} shows that English skills are critical to integration in society; and directly linked to other integration outcomes.

Furthermore, politicians of all parties have repeatedly highlighted the importance of migrant communities being able to speak English.

Current situation

Provision of ESOL is devolved to each UK nation. In England, ESOL policy for adult learners is the responsibility of the Skills Funding Agency (SFA), now overseen by the Department for Education (until July 2016, it was overseen by the Department for Business, Innovation and Skills). It is financed through the Adult Skills Budget. ESOL is a regulated programme made available through providers – usually Further Education colleges.

Despite the overwhelming evidence of the importance of ESOL to integration, new data published by the House of Commons Library shows that the level of government funding for ESOL in England fell by 60% in real terms from 2009-10 to 2015-16, from £203m to £90m⁷¹.

In theory in England refugees are eligible for fully-funded ESOL provision on the condition that they have attained refugee status and meet necessary income requirements. However, in practice (as detailed below) the experience is very different.

In contrast, asylum seekers are only eligible for co-funding at 50% of cost and only after they have waited for a decision on their asylum application for six months. In Scotland and Northern Ireland, asylum seekers are eligible for fully funded ESOL from the point of their asylum claim.

⁶⁸ 'Interim report into the integration of immigrants', All Party Parliamentary Group on Social Integration, 5 January 2017 - <http://www.socialintegrationappg.org.uk/reports>

⁶⁹ 'Moving on Together: Government's recommitment to supporting refugees', UKBA, March 2009

⁷⁰ 'Home Office research and policy conclusions relating to the effective integration of refugees', Still Human Still Here, 2016

⁷¹ 'Adult ESOL in England', House of Commons Library, 22 January 2017, <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7905#fullreport>

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Since the start of 2016, there has been a small number of one-off Government initiatives on ESOL for refugees and other groups.

In January 2016 the then Prime Minister announced a new, one-off £20m fund⁷² to provide English language tuition to Muslim women. Its stated aim is to combat the threat of radicalisation in long-standing communities, and therefore refugees will effectively be excluded from this funding.

The Home Secretary announced in September 2016 an extra £10m over the next five years for ESOL provision for Syrian refugees resettled through the Vulnerable Persons Resettlement Scheme (VPRS)⁷³. Refugee Action believes this is a welcome step, but does not go nearly far enough – the funding supports one small select group of refugees to integrate while neglecting the vast majority (including other resettled refugees; and Syrian refugees who came to the UK as asylum seekers).

The Government also launched the Controlling Migration Fund in November 2016⁷⁴, which aims to mitigate the impacts of immigration on local communities. It includes £25m a year for four years from which councils in England can bid for funding to tackle “local service impacts”, which can include funding for ESOL provision. Again, this is welcome - yet local authorities will be under no obligation to fund ESOL through this scheme.

These recent measures demonstrate that where political will and a perceived need exist, the Government will act and funding can be identified.

However, they clearly do not constitute the comprehensive response needed from the Government to restore the huge cuts in ESOL funding in recent years; or to ensure that all refugees can access the English language learning they want and need, to fully integrate into UK society and economy, unlock their potential and build new lives for themselves.

Beyond the recent substantial funding cuts, the prospects for high quality provision are further

⁷² “Passive tolerance’ of separate communities must end, says PM’, 10 Downing Street press release, 18 January 2016 - <https://www.gov.uk/government/news/passive-tolerance-of-separate-communities-must-end-says-pm>

⁷³ ‘First anniversary of government commitment to resettle 20,000 Syrian refugees’, Home Office news story, 7 September 2016 - <https://www.gov.uk/government/news/first-anniversary-of-government-commitment-to-resettle-20000-syrian-refugees>

⁷⁴ ‘Controlling Migration Fund: prospectus’, Department for Communities and Local Government and Home Office, 9 November 2016 - <https://www.gov.uk/government/publications/controlling-migration-fund-prospectus>

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reduced by the fact that England (unlike Scotland and Wales) doesn't have either an integration strategy or an ESOL strategy, to set and measure progress against clear agreed objectives.

Refugees' experiences

While refugees are in theory entitled to fully-funded ESOL, research carried out by Refugee Action among resettled refugees in 2016⁷⁵ found that in practice, their experiences did not reflect this.

All of the refugees we spoke to were desperate to learn or further improve their English. The reasons for this were many: without exception those we interviewed wanted to work and felt they are more likely to achieve this with English. Refugees also wanted to learn so that they can meet their neighbours, go shopping, visit the doctor and volunteer in their community. Refugees with low levels of English reported that they often feel isolated.

Our research identified the following barriers associated with accessing ESOL as experienced by resettled refugees, many a direct result of funding cuts negatively impacting on individuals' learning prospects and experiences:

- We spoke to refugees still on waiting lists who have been in the country for several months and others who experienced lengthy waits before accessing classes.
- Some refugees are required to travel significant distances to attend ESOL classes. This can be prohibitive for individuals on limited incomes due to the cost of travel; for those who are in work; and for those with other responsibilities such as childcare.
- The number of teaching hours available varies, and is often not enough. Some respondents had been placed in ESOL courses that were below the level at which they were assessed.
- Female refugees face these and other additional barriers

This year, Refugee Action has undertaken new research⁷⁶ among seven ESOL providers in England.

We found that:

- Several providers reported refugees waiting over a year for English lessons – and in one area the wait can be up to two years.

⁷⁵ 'Let Refugees Learn', Refugee Action, May 2016 - <http://www.refugee-action.org.uk/wp-content/uploads/2016/11/letrefugeeslearnfullreport.pdf>

⁷⁶ 'Locked out of learning: A snapshot of ESOL provision in England', Refugee Action, March 2017 - <http://www.refugee-action.org.uk/resource/locked-learning-snapshot-esol-provision-england/>

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- Of the providers surveyed, the average waiting list size was over 700 people. Some providers had waiting lists for lessons stretching to more than 1,000 people.
- Providers say the situation is getting worse – the main reason is government cuts, with funding failing to keep pace with high demand.
- Limited childcare provision is cited as a barrier to women being able to attend classes.
- Some providers have been forced to cut the number of ESOL hours offered by over half in recent years.
- Due to unmanageable numbers, certain providers have stopped taking new applicants for the first time in recent memory in order to cope with the backlog.

The overall picture which emerged shows a squeezing of ESOL services, with providers and their partners affected by relentless government cuts and a lack of resources.

This is despite the efforts of those providers to prioritise ESOL lessons, sometimes to the detriment of other areas, and to do all they can to keep waiting lists to a minimum.

Our findings echoed a survey carried out in 2014 by the National Association for Teaching English and Community Languages to Adults (NATECLA)⁷⁷ which found that over 80% of providers have significant waiting lists of up to 1,000 students for ESOL courses.

In contrast to formal, accredited, government-funded ESOL, community-based provision refers to English language support offered on a voluntary basis by individuals or charity, faith or community organisations.

There are a huge range of initiatives of this kind. Many groups provide regular classes for groups of refugees or asylum seekers, taught by professional teachers and volunteers.

We welcome these initiatives, and believe that formal English language learning can be effectively supplemented through additional support from charities like us and from volunteers in the community, particularly for spoken English.

At Refugee Action we train and support volunteers to provide English language support to refugees through all our resettlement programmes in the North West of England, the Midlands and London; and provide weekly ESOL classes for refugees at different levels of English language, delivered by volunteers in Bradford.

Our recommendations (see below) include a proposal for a national framework to connect and strengthen these initiatives.

⁷⁷ 'Migrants on huge waiting lists for English courses as government funding is cut again', NATECLA, 2014
- <http://www.natecla.org.uk/news/779/ESOL-waiting-lists>

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However, we also strongly believe that community-based ESOL can only serve as a complement to, rather than as a replacement for, formal, accredited ESOL – partly to reflect the importance of professional, formal language teaching; partly because upon completing a formal ESOL course, learners are awarded a qualification as a certificate, which refugees need in order to advance to further education or employment.

Public support for action

Independent opinion polling shows strong public support for all refugees being able to learn English; and clear recognition of the benefits this brings both to refugees themselves and to the UK as a whole.

A recent poll by Ipsos MORI⁷⁸ finds 60% of the British public believe the Government should invest in English lessons for all refugees. Just 3% believe the Government should provide funding for only Syrian refugees to learn English.

Polling carried out in 2016 by BritainThinks⁷⁹ showed that of those surveyed:

- 73% agree that there are benefits to Britain and to local communities if refugees can speak English.
- 75% agree that learning English is beneficial to refugees.
- 91% think refugees in the UK have a responsibility to learn English.
- When asked what is the single most important benefit to British society of refugees speaking English, the most popular response was that refugees are better able to work and make a living, cited by 18% of participants.
- When asked to select up to three main benefits, the two most popular responses were refugees are better able to integrate (56%) and refugees are able to work and pay taxes (52%).
- 40% say they would consider volunteering to help refugees learn English.

Recommendations

Refugee Action believes that if the UK recognises an individual's status as a refugee, we should also provide them with the tools to fully integrate into our society and successfully build a new life for themselves. Access to high quality English provision is key to this.

⁷⁸ Ipsos MORI, 2017, upcoming release as part of ongoing immigration series in partnership with Unbound

Philanthropy. Latest data available at: <https://www.ipsos-mori.com/researchpublications/researcharchive/3732/>

Immigration-one-of-the-biggest-issues-for-wavering-EU-referendum-voters.aspx

⁷⁹ BritainThinks for Refugee Action, April 2016. http://www.refugee-action.org.uk/campaigns/let_refugees_learn/

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We are therefore calling on the UK Government to act on five essential recommendations:

1. Create a fund specifically to support refugees learning English

This should enable all refugees that require English lessons to have free, accessible ESOL for their first two years in England.

Our analysis shows this would cost around £1,600 per refugee per year; this would require the Government to invest £42m a year to achieve this goal. This is in addition to the £10m committed by the Government for providing ESOL lessons to resettled Syrian refugees, in order to ensure that all refugees – regardless of their nationality or means of arrival in the UK– have the opportunity to learn English.

The cost of two years' ESOL for each refugee is effectively fully reimbursed to the taxpayer following an individual's first eight months of employment at the national average wage, and within 15 months at the lower wage of £18,000 per year. Teaching refugees English is therefore a sound investment for Britain.

2. Publish an ESOL strategy for England

This should set clear national targets for ESOL provision and attainment, and enshrine refugees' access to ESOL as an entitlement to ensure that refugees do not have to wait to access the provision they require.

Similar strategies are already in place in Scotland and Wales and can be used to draw from.

3. Ensure full and equal access to ESOL, particularly for women

Female refugees' ability to attend English language classes can be improved by ensuring they have access to childcare facilities. In addition, in all cases where ESOL providers are located far from the homes of refugees, funding should be made available to cover travel costs.

4. Provide asylum seekers with the right to access free English language learning

This would support their integration right from the point when they make their initial asylum claim. Currently, people in England seeking asylum are not eligible for government-funded English language teaching until they have waited for six months or more for an outcome to their asylum application, at which time they can receive partial funding to cover 50% of the course. This is inadequate, as asylum seekers are not allowed to work during this period and therefore are unlikely to be able to afford the other 50% of the cost of the course.

This learning could be delivered through a combination of formal and informal means; however, given the very low levels of income that asylum seekers usually live on, it is essential that this teaching is available free of charge. Free English teaching from the point of claiming asylum is currently available in Scotland and Northern Ireland.

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5. Facilitate a national framework for community-based language support

Community support for refugees wishing to learn English can be a vital complement to (but not a replacement for) formal, accredited ESOL learning for refugees. The UK Government should bring together civil society, the private sector, local government and other key stakeholders to develop a framework that enables all interested parties to pool resources, share good practice and thereby increase the provision and quality of community-based language support.

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RUTH HAYMAN TRUST

Introduction

The Ruth Hayman Trust was set up as a charity in 1983 by NATESLA (now NATECLA, the National Association for Teaching English and Community Languages to Adults) to support the education and training of adults settled across the United Kingdom who speak a language other than English as their first language. Our trustees, who include refugees and ESOL speakers, have a wide experience of language teaching and working with immigrants and refugees in both the statutory and voluntary sectors. We are also grateful to have very supportive patrons. We are entirely run by volunteers so over 90% of the money we raise goes directly to help learners. Last year we awarded more than £30,000 to 165 applicants coming from 44 countries. The vast majority were refugees and asylum seekers. They were on courses from Entry 1 Level ESOL to degrees and for medical professionals seeking registration. All applications have to be accompanied by a reference (see Annual Report for 2015-6 attached).

In this submission we draw on our 33 years experience, supported by case studies, as we consider the issues from the perspective of ESOL learners. Other data quoted comes from the Parliamentary briefing paper.

Principle Three: “one size fits all”

Our experience has always been that our applicants come to us with the widest range of skills, qualifications and life experience: qualified refugee professionals; younger refugees, whose education has been catastrophically disrupted by war; those with no or limited literacy; newly arrived spouses and women emerging from a period devoted to looking after young children who now want to improve their skills and enter the workforce. One size certainly does not fit all, either in the curriculum or in the time needed to acquire the different language skills.

Principle Four: For new immigrants integration should begin on arrival in the UK

We know from the weight of applications we receive that new arrivals want to learn English immediately, and we know there is research to show that many make more progress if they can do this. (This may not be true for some severely traumatised refugees.) However there are barriers to immediate access. Asylum seekers face different policies across the four nations of the United Kingdom; they are required to pay fees in England. All new arrivals face the same barriers to access: travel and childcare costs; waiting lists for classes; finding money for fees: finding that classes are full when they do get the money. (See below under Barriers to access.)

1 English language provision

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a) How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language provision be improved?

The Ruth Hayman Trust does not recognise the distinction implied in this question. We have supported learners from all backgrounds, and with the full range of learning needs, in FE colleges, in community-based provision and in provision run by voluntary organisations across the UK. Our concern is to fulfil the duty of care and responsibility, which we have to both our donors and our applicants. This is to ensure that provision is of good quality and relevant, and to check that there are systems in place for accountability and quality control.

In terms of improvement we cannot emphasise enough the importance of ensuring learners can **progress** from discrete ESOL classes to academic and vocational provision or have pathways straight into employment. Such routes are essential and require good careers advice and student counselling and, where necessary, continued language support. More than 50% of our awards are to support fees on such courses or to gain certificates for immediate access to employment.

b) Role of central and local government, business and service users

Overall strategy

We believe there is a role for all agencies but first there needs to be a strategic overview by central government of all the needs for ESOL across England. This can then enable the development of an ESOL Strategy for England, which is now being proposed by NATECLA. One already exists in Scotland and Wales. At a local level there is need for provision to be mapped and for providers to work together to maximise the opportunities for learners.

Sufficient provision

It is central government's role to ensure there is adequate funding to support ESOL provision. The fact that funding has been cut by 60% over the past six years (briefing paper) has seriously affected learners and would be learners.

Securing ESOL provision for which funding has been agreed

We are concerned that any central government plans for ESOL could be imperilled by having no hypothecated funding for ESOL when funding overall is delegated to the Local Enterprise Partnerships.

Quality control

As a charity we have a duty to our applicants and our generous donors and fundraisers (including ESOL students who themselves raise money for us) to ensure our awards are made to

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pay for good quality tuition, on programmes with clear quality control and accountability. At the moment most courses are inspected by OFSTED. We are concerned that plans for extending responsibility for much ESOL provision to Local Enterprise Partnerships should continue to include systems for quality control and accountability.

Learners on low or minimum wages.

We are also concerned that the needs of the low paid in work (see below under Barriers to access) could continue to be ignored

c) College based and community provision

As already noted the Ruth Hayman Trust supports learners on ESOL courses run by FE colleges (which can also be community based) and by community and voluntary organisations. There are strengths in all forms of provision if they are appropriately tailored to meet specific needs. But they fail in their responsibility to their learners if they see themselves as competing and exclusive and there is no co-operation across sectors to enable learners to progress.

Progression

The best provision we have encountered has clear lines of progression from say conversation clubs to community based classes and then to colleges with access to vocational and academic courses. We have supported applicants who have made that journey. Only half our awards pay fees for discrete ESOL provision. The rest are to support adults who speak English as a second or other language on vocational and academic courses, and to help refugee doctors, dentists and pharmacists to pay the costs of validating their qualifications here. Supporting learners in this way not only improves their employability and their opportunity to make a significant contribution to the UK economy. It also encourages integration.

Case study: A refugee from Somalia started ESOL classes. Then in 2009 when she was still an asylum seeker she enrolled in an FE college and applied to us for help with the exam fee for IELTS – the International English Language Testing System. This is the English language qualification needed for university entrance. She was granted indefinite leave to remain, gained a degree in pharmacy, has successfully completed her work placement and is working for her registration.

Case study: A young woman refugee from Mauritius progressed successfully from a beauty therapy class with English language support onto a mainstream class leading to a professional qualification.

2. Barriers to participation

Fees required from Asylum seekers

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In England (but not in Wales, Scotland and Northern Ireland) asylum seekers can be, and are, asked for around £300 for a term's ESOL course out of their £35 a week maintenance allowance. We are constantly asked to support fees for them and do our best to help as many as we can. By no means all of them are recent arrivals, with some applicants who are still waiting for a Home Office decision after being here for more than five years.

Case study: A young woman asylum seeker from Angola, who had been here three years and was helping out in a charity while waiting for a decision on her status, applied to us for help to pay the £650 fees for the Entry Level 3 and Level 1 ESOL courses to improve her reading and writing so she would be ready for work when she was granted leave to remain.

Insufficient provision.

We have examples of applicants receiving our award in good time to register for an ESOL course only to discover it is full and they have to wait several months to try to register again.

No access to child care

We are clear on our website, and in all the information we send out, that we do not have the funds to support child care. However, we still receive applications for help. For example we recently received applications from two women, one from Nigeria and one from Uganda, who want to return to study to get the English qualifications to enable them to access courses in child care and nursing but need help with their own child care costs.

Travel costs

We provide help with travel costs only when the application is accompanied by a medical certificate from a clinician. But we receive applications (with supporting references from lecturers and advisers) asking for help for students who are not disabled but have to travel several miles to their classes each day. They are mostly on benefit or asylum seekers and give us details of their income and the cost of a weekly travel pass to demonstrate how difficult or impossible it is for them pay the travel costs.

Applicants on low incomes who are not themselves entitled to fee remission

In the experience of the Ruth Hayman Trust there are many learners in this category, especially women who want to return to study and then work, but who have a husband on benefit or a very low income.

Case study: A wife from Morocco who has been here one year and whose husband receives a Disability Living Allowance cannot afford the £500 fees for her year-long Entry 2 Level ESOL course.

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Case study: A Kurdish refugee has been here 11 years, bringing up her family and looking after elderly parents. Now her children are all in primary school she wants to enrol in an Entry Level 3 ESOL class and eventually gain a qualification in child care. Her husband works part-time on a low income, so they find it very difficult to meet the £152.50 for fees.

Case study: An older woman from Bangladesh who has been here 22 years bringing up her family also needs to improve her English before gaining a qualification in child care. Her husband is in work but the details provided show he is on a very low income and finding the £150 fees is very difficult.

Case study: A Bulgarian woman doing casual domestic work wants to improve her English in order to fulfil her dream to be a nurse, but cannot afford the £240 termly fee.

3. Devolution of immigration policy

For 33 years the Ruth Hayman Trust has supported ESOL learners across the United Kingdom. We do have concerns on how the devolution of immigration policy might affect ESOL learners themselves. They already tell us of the challenges they face when they move across and within the UK: from Belfast to Bradford; from London to Glasgow; from Doncaster to Leeds. They encounter different priorities and different systems for paying for and providing education and training, whether it is for basic ESOL courses or for vocational and academic tuition.

At the same time the English language requirements for settlement and citizenship are the same across the UK.

So if the systems across the UK are different, the variety of needs of the learners themselves and the barriers they face are similar. This is true whether they are preparing to take the language tests, or are recent arrivals with no English and little previous educational experience, or they come with advanced professional qualifications or are women seeking ESOL classes after a period spent bringing up their children.

The focus of the Ruth Hayman Trust's submission has therefore been to use the evidence from our applicants to look at issues from the point of view of the ESOL learners themselves.

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SCOTTISH QUALIFICATIONS AUTHORITY (SQA)

Scottish Qualifications Authority (SQA)

SQA is the National Awarding Body in Scotland (established by Act of Parliament). SQA is independent of government but works closely with government

SQA is responsible for all qualifications in Scotland (other than university) degrees. We develop the qualifications and then devise the examinations, assessment and quality assurance processes.

Our qualifications support the development of our competitiveness as a nation and our aim is to assist all of our citizens to achieve their learning goals

SQA would like to respond to the following question:

Devolution of immigration policy:

- a) To what extent could some of the responsibility for immigration be transferred to devolved governments, metro-regions, Local enterprise Partnerships, or groups of local authorities?**

Since 2005, SQA has worked in partnership with the Scottish Education sector and the Scottish Government in developing a full suite of ESOL qualifications which sit at the heart of the Scottish Government's successful Adult ESOL strategy. The resulting qualifications developed ensure that candidates can develop their skills and knowledge in an integrated manner with a focus on relevant contexts - everyday life, work and study. They are qualifications not just end point tests. The teaching, learning and assessment associated with these SQA ESOL qualifications take place in a network of highly valued Scottish public sector colleges and community education providers – which are subject to regular inspection by Education Scotland.

At the same time, SQA engaged positively with the UK Home Office to ensure that applicants for British citizenship, settlement or Indefinite Leave to Remain were able to use a SQA regulated ESOL Qualification, latterly at SCQF level 4 (B1 Common European Framework of Reference (CEFR)) to meet the English language requirement. SQA invested significant resources over 10 years on areas such as citizenship materials, teaching resources and adapted assessment support packs to meet and react to the Home Office requirements around citizenship/right to remain.

Secure English Language Tests (SELT)

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When the SELT process was set up to deal with overseas applicants for work and study visas, it was accepted that UK based applicants could use other recognised and regulated English Language qualifications (including SQA ESOL) to support their citizenship/right to remain.

From 5th November 2015 the Home Office decided that all applicants for citizenship/right to remain must now take the Secure English Language Test (SELT) in specific test centres and as such other qualifications could not now be used as evidence of an applicant's English language skills. The Home Office appointed two providers to deliver the SELT's worldwide. These are Trinity College London and the IELTS SELT Consortium. There are only two SELT test centres in Scotland, one for Trinity SELT in Glasgow and one for IELTS SELT in Edinburgh.

Impacts on integration:

Immigrants are less motivated to attend ESOL courses in Scottish colleges/community learning centres, where ongoing integration can take place and from which they can gain qualifications to apply for British citizenship, settlement or Indefinite Leave to Remain. They are more likely to attend shorter preparation for SELT sessions rather than extended college SQA ESOL courses which focus on integration through teaching, learning and assessment by exposing candidates to a range of meaningful and relevant contexts matched to their needs and aspirations.

The SELT qualifications are not based in the language and culture of Scotland and local contexts and ESOL courses preparing immigrants for SELT do not address citizenship, local contexts and employability. Assessment of SQA ESOL qualifications ensure that the national standards for English are met at SCQF Level 4 (CEFR B1) while learning takes place in meaningful contexts, fostering ongoing integration.

The SELT qualifications are not accessible as there are only two centres in Scotland. SQA qualifications can be accessed at SQA Approved and Education Scotland inspected centres throughout Scotland, fostering local integration and progression in the development of English language skills.

Recommendation:

Given the above and in order to promote and encourage more meaningful ongoing integration of immigrants, SQA would recommend that the responsibility for determining the approach to evidencing English Language skills for citizenship/right to remain should be transferred to devolved Governments, perhaps working within a nationally agreed framework, covering such aspects as the level of language to be evidenced. In Scotland we already have devolved authority for education and as such this approach would ensure that Scotland's own qualifications which sit at the heart of the education system are recognised for settlement and citizenship purposes.

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SOCIAL SUPPORT AND MIGRATION IN SCOTLAND PROJECT (UNIVERSITY OF GLASGOW/SWANSEA UNIVERSITY)

This submission comes from a team of researchers working on the Social Support and Migration in Scotland project team (SSAMIS, <http://www.gla.ac.uk/research/az/gramnet/research/ssamis/>): Prof. Rebecca Kay, Dr. Moya Flynn, and Dr. Paulina Trevena from the University of Glasgow, and Dr. Sergei Shubin, Dr. Holly Porteous, and Ms. Claire Needler from Swansea University). Our 4-year ESRC-funded study (2013-2017) focuses on migrants from Central and Eastern Europe living in both urban (Glasgow and Aberdeen) and rural (Angus and Aberdeenshire) areas of Scotland and covers a broad variety of issues impacting on their everyday lives, including access to ESOL courses and integration. In the course of the research we have spoken to over 200 migrants and 60 experts and conducted observations at workplaces, sites of service provision and places where people meet socially. Based on our research results, we would like to share some recommendations applicable to this call.

Moreover, one of the researchers on the SSAMIS project, Dr Paulina Trevena, will be carrying out a project with the Scottish Parliament exploring the rationale behind and opportunities for introducing a Scotland-wide inclusive integration policy for migrants arriving/living in the country. This project will run September 2017-July 2018, and Dr Trevena will be happy to share the results with the APPG on Social Integration upon its completion.

Ad. 1. ESOL provision

- a) Improvements to provision. In order to increase effectiveness of provision, ESOL programmes should ideally be:
 - led by trained professionals with sound knowledge and experience of teaching ESOL (volunteers included);
 - made as practical as possible with focus on language learners' needs and on communication in action, e.g. through applying the social practice model of learning;
 - sites of gaining local knowledge, e.g. through use of real-life materials in teaching (such as leaflets about recycling in the area, housing opportunities etc.);
 - complemented by informal learning and mixing with native speakers.
- b) Businesses employing a large percentage of migrant workers with no English or low levels of English should support their language learning by co-operating with local language providers (such as Workers Educational Association, WEA). Language provision is often available to business yet providers encounter a number of problems in offering such delivery, for example:

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- many businesses do not wish to engage with language providers at all (even if courses are offered to them for free or at a low cost and over a short period of time);
 - businesses typically agree to the language courses on their premises only taking place directly before or after a shift. This often puts additional pressure on learners as shift work typically starts very early and/or finishes late and involves 8-10 hours of work. This does not support successful learning as the course attendants are simply too tired to learn. The overwhelming majority of businesses are not willing to allocate any of the non-English speaking staff's work time to language learning, which would be the best solution for both providers and learners;
 - many businesses struggle to provide suitable premises for course delivery: courses often take place e.g. in meeting rooms which are not always available during agreed course time (business meetings take precedence).
- c) College-based ESOL usually provides high-quality teaching but is not available to many learners due to affordability, working patterns, childcare issues and limited availability (demand is constantly higher than supply). Moreover, it rarely provides learners with the opportunity to mix and establish meaningful links with the local community as part of the educational experience. Community-based learning is often run by untrained volunteers who may not have the right skills and/or experience to teach but usually provides more opportunities for becoming part of the community.

Ad. 2. Barriers to participation in language provision

Most common barriers to participation in language courses:

- timing and lack of flexibility of classroom-based courses (especially for shift workers whose shifts change regularly hence making it impossible to attend courses at the same time every week);
- childcare issues (lack of childcare provision and scarce opportunities for family learning);
- transport (especially in rural areas) – links, access, affordability;
- affordability, especially of full-time College courses (learners often need to move from full-time to part-time working arrangements when taking up a course at College and many learners cannot afford to do this);
- accessing information about available courses (including the language barrier!).

Possible solutions to the above barriers are:

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- provide opportunities for more flexible learning (e.g. courses running at different times of the day, e.g. morning and evening or classroom-based courses complemented by online courses);
- provide more family-learning or (affordable) childcare options for adult learners;
- provide more free/low-cost courses;
- incentivise employers to provide more opportunities for workplace learning (formal or informal);
- improved marketing of available courses, including producing information material in other languages;
- improving the registration process for language courses, especially in big cities, which would enable different providers to share information on available spaces and allocate these more effectively.

Ad. 3. Devolution of immigration policy.

a) To what extent could some of the responsibility for immigration be transferred to devolved governments, metro-regions, Local Enterprise Partnerships, or groups of local authorities?

Scotland, as opposed to most other parts of the UK, needs migrants to sustain its demographic and economic growth (Scottish Government 2013). There is great concern in the region about the impact of Brexit and curbing migration to Scotland on its economy, particularly in certain areas and industry sectors which rely heavily on migrant labour. Local authorities across Scotland have noted the social, demographic and community diversity benefits of migration and therefore a UK-wide approach focused primarily (if not exclusively) on the economic impacts of migration and labour force needs may be less appropriate (COSLA 2016). Local authorities are already largely responsible for issues relating to community development, language provision, integration, but these responsibilities do not currently come with appropriate powers regarding a devolved model of migration policy. Therefore, a regional migration policy seems as the most sensible solution to Scotland.

b) How might the establishment of a regionally led immigration system impact, positively or negatively, on levels of integration?

There is a growing body of research pointing to the fact that integration takes place at local level (Penninx et. al 2004, Penninx 2009, Caponio and Borkert 2010). Therefore, the responsibility for supporting integration should lie above all with the local authorities, especially as the local context differs greatly between councils (and wards within councils) in terms of levels of migration, resident populations, their needs and locally available resources. Considering this, a local integration policy (or strategy) which would be able to take this specific context into account would positively support levels of integration. Nevertheless, these local policies

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(strategies) should be designed in line with a shared vision of integration and linked to national level mechanisms which would support sharing of good practice and systems for addressing local issues.

Indeed, the SSAMIS research has shown a need for greater support for integration at neighbourhood/local level both in large cities and small towns. Migrants from Central and Eastern Europe often work in highly segregated workplaces (with a predominantly migrant workforce) where they have little scope for learning English or meeting people from the local community. A number of our interviewees have mentioned the desire to make more Scottish/British friends but at the same time have talked about the barriers to doing so. The biggest are language and lack of opportunities for meeting local people in a communal space. This is felt especially strongly in our rural research locations, where many of our participants reported social isolation. Thus, providing public, family-friendly and safe spaces where migrants could establish meaningful links with other people from the community as part of a local integration strategy would greatly improve the process of integration and fostering good community relations.

Since having strong links with others in the community are crucial to developing a sense of well-being and feelings of belonging in a new country, we are currently working towards creating opportunities for people to come together and establish such links (please see links to blog posts on the initiatives below). As follows from our research and community work, a social integration strategy including all categories of migrants (asylum seeker and refugees, economic migrants, students, those arriving as family members) and engaging directly with members of the long-settled community which would be implemented at a local level would be highly beneficial for the UK.

For further information on SSAMIS community initiatives:

<http://www.europenowjournal.org/2017/01/31/language-cafes-as-a-site-of-wider-cultural-integration/>

<https://gramnet.wordpress.com/2017/01/19/and-making-it-happen-in-angus/>

c) How might it impact on the political and public debate on immigration issues?

The SSAMIS research shows that people coming to live in the UK often come across negative portrayals of who they are which are supported by the overwhelmingly negative discourse on immigration dominant in the mainstream media. 'They come here and they go on benefits, they steal our jobs, they get housing' are the types of portrayals many migrants in the UK are faced with. Meanwhile, the experiences and perspectives of migrants themselves often remain little understood. Here again a local integration policy would be of benefit as it would provide scope for people to actually establish links with one another rather than make assumptions about one

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another and support mutual understanding rather than maintaining negative myths. Therefore, it supports a more informed political and public debate on migration.

One of the examples of a locally-led initiative which supports community building was the SSAMIS 'Journeys' exhibition. As mentioned earlier, our research found that there is little visibility of migrants in the public space in many areas where they have settled, and in areas of 'new migration' in particular. At the same time, several of our research participants commented on perceptions of 'migration' and 'migrants' that did not reflect their own experiences and stories and felt that these were missing from both local and national discussions and media representations. This concern has led SSAMIS to create a platform for migrants to represent themselves, their lives and their everyday experiences by developing an exhibition called 'Journeys' for the Arbutnot Museum in Peterhead in partnership with a number of local organisations. The museum has a collection of artefacts reflecting Peterhead's whaling and fishing past, but nothing that shows the impact of recent migration to the town, nor the experiences of migrants themselves. The migrant community is also underrepresented in visitor numbers. 'Journeys', an exhibition containing artefacts loaned by study participants and other co-created materials included workshops and public events. It was an example of creating a space for reflection: 'Why do people move to Scotland? What does it feel like? How can we make newcomers Scotland?' The feedback from the Museum was very positive: visitor numbers were high, people found the exhibition interesting, and it drew in people from migrant communities as well. Therefore, this initiative is an example of how partnership working at local level can improve mutual understanding and support community building.

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SWINNEY, KATHERINE

This submission is from Katherine Swinney in a personal capacity. I am an Economic and Social Research Council funded doctoral researcher in the School of Education, University of Sheffield with thirty years' experience of English language education provision, having worked in commercial language schools, in FE, in community education and currently in the voluntary sector and in HE. I work as Director of Studies for Aspiring Communities Together (ACT) an inclusive Sheffield-based community organization delivering services in health, ESOL, employment, training, social and physical activities for adults and children.

I am an Associate Lecturer at the University of Sheffield, teaching modules for the Department of Lifelong Learning in Globalisation, Research in Teaching and Learning and Sociolinguistics. I was an invited expert to the European Council Linguistic Integration of Adult Migrants Conference in Strasbourg 2016 and my paper will be published in spring 2017. The basis of these recommendations is a research study which has explored the role of ESOL provision in relation to the community it serves in Burngreave in Sheffield and advocates a networking approach. I also draws on the work of Phillimore (2011), Simpson (2011) and Wessendorf (2012).

How might the provision of English for Speakers of Other Languages (ESOL) and community-based English language programmes be improved?

The government reassessment of its current 'one size fits all' approach to immigration policy for new immigrants is particularly welcome with regards to English language learning. The concept that integration should begin upon arrival in the UK also has resonance regarding initial language assessment and placement within appropriate provision.

Recommendation 1. Initial assessment of language education needs should distinguish language level, previous educational and occupational background and students' purpose in learning English.

Recommendation 2. Three routes of language provision should be offered

a) Intensive literacy based basic education for adults with little or no education in their country of origin and low levels of literacy,

b) Standard ESOL language training for adults with at least primary education and some secondary education, who are motivated to learn for communicative purposes, for example, to support their children, find a job and become active citizens.

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c) Intensive fast track language training for adults who already have FE or HE education and a vocational or professional career path which they could access in the UK with appropriate language training. This could lead to an IELTS type accreditation.

Research regarding adult migrants' primary motivation in learning English demonstrates at least three ways to assess and categorize adult migrants which are relevant to the provision of language learning. Phillimore (2011) categorised adult students according to their motivation and educational background as 'communicators', 'improvers' and 'higher levels'. This approach is corroborated by my study in Burngreave where adult learners are motivated to learn predominantly to live independent lives and in their roles as parents and community members. The Adult ESOL Core Curriculum and learning resources based on a functional model of literacy and language is now in need of a review to reflect changes in society and in technology available for learning. People who have arrived in the U.K. with higher levels of English exemplified by either 'improvers' or 'higher level' learners students 'seeking to transfer qualifications gained in other countries to study or work are not well served by this functional curriculum. Another group who are not served well are adult migrants who have had little or no previous education because they are unable to progress beyond a very basic level given the resources which are currently allocated. These learners need an intensive literacy and study skills input to compensate for their previous lack of basic education.

Recommendation 3. Language classes should be networked to services, to employment opportunities, to advice services and to career and professional development.

A key area is the role of language classes which are linked to other services (NIACE, 2012). In my study in Burngreave which has a very young population, schools are focal points of community life and for students in the study they played a vital role in networking. Schools offer a welcoming environment and give adult students an insight into school life in England as well as offering other classes, voluntary opportunities such as reading volunteers and opportunities for employment as playground supervisors, classroom assistants, cleaners, teaching assistants and teachers. Community organisations which offer advice services, preschool provision and complementary language schools also root language classes in community life. There is a difference between provision which is networked to the community it serves not just located there.

Another key area is the consideration of English language classes, not merely as participants in local networks, but as generators of community networks. The profile of the English classes (in Burngreave in Sheffield) shows that the classes represent a crucial meeting point of people from diverse language, ethnic and educational background. Wessendorf (2012) calls this a unique zone of contact. Their meeting in the classroom is sustained across many years and is not limited to one class. Local community campaigning organisations can offer students the chance to engage in active citizenship and networking opportunities. However, active and grassroots

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organisations best suited to providing supportive services for residents of super-diverse communities may themselves require bridging mechanisms to local authorities as they are crucial to the networks

What role, if any, should central and local government, businesses, and service users play in the funding and delivery of these initiatives?

Central and local government can contribute positively in the delivery of these initiatives by recognizing that each area is different and that local community organisations and local businesses can play an important role in delivering and supporting services for local people.

It is important that local organisations and local service users are recognized as experts in their own lives. Flexible and collaborative approaches to research enable community knowledge to be generated about data which directly impacts on community concerns. This knowledge is different to the knowledge of educational professionals. High level standard English is not necessary in every research scenario and valuable contributions to knowledge can be gained from research which uses a combination of approaches including informal translation, informal interpretation, 'Englishing' and explaining and sensitive communication. Visual tools can help this process and can enable adult students to understand data about their own provision and make considered judgements and recommendations.

What are the advantages and disadvantages of college-based ESOL provision and community-based English language programmes, respectively?

The strength of college based provision is that there is potential for access to additional student services which are not available in the community for example dyslexia support and library and learning centre resources. The main advantage is that there is potential for direct access to vocational courses and Access to HE and HE courses. These services depend on ESOL tutors and ESOL courses being integrated into mainstream student facilities within colleges, being networked to other departments and resources. This requires integrative and inclusive practices and monitoring of student progression with colleges. College provision is ideal for students who are ready to join vocational courses and Access to HE courses.

In contrast to college provision which enrolls every academic year, community focused classes represent continuity and a building of relationships over many years (Simpson et al., 2011). Students become volunteers and students who get jobs in schools become role models for students in the class. In Burngreave, English language students have led in campaigns to keep the library and the adventure playground open and in the formation of local voluntary groups. The concept of a networked centre and a networked classroom can serve as a tool for tutors and providers to evaluate their role in relation to their students and to the wider community. For tutors this practical application enables an analysis of classroom practice, investigating how a class is orientated towards the wider community and links to other activities and opportunities.

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**What are the most common barriers to participation in English language classes?
How can these be overcome?**

Childcare is the single biggest barrier to participation in English Language classes and can be overcome by situating English Language classes in schools or in centres with pre-school provision and crèche facilities. Classes in schools enable parents to make one single journey which also saves bus fares and travel time.

Attendance on English Language classes which have been identified through a thorough assessment process to address the needs of the adult migrant need to be protected from courses of study and appointments from benefit agencies which serve government agendas about unemployment figures and other benefit claimant. The systems need to work together to promote education and the realisation of each person's potential.

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TOMLINSON, JESS & MENADUE, BEN

Abstract

Migrants are participants in the labor market as well as members of civic society and a range of measures are required for successful integration into local communities. Delivery of regional migrant services in the UK could efficiently employ existing capacity and experience in devolved project and financial management that has been gained in the allocation, management and auditing of EU funded projects which supported economic development and social inclusion through a series of inter-related funds. These are most clearly seen in the action of delivery of the Objective One programme for under-developed regions, a common feature of EU Convergence funding. Focused programmes that develop migrant entrepreneurs are a facilitator for social inclusion that identifies migrants as economically active and locally beneficial participants rather than separately cloistered groups, operating independently of national and local economic and social practices. The provision by Local Authorities of funding networks and information access will optimize conditions for new business creation, creating more attractive and effective opportunities outside the traditional migrant hubs. This, in turn, will catalyze social integration by breaking cloistering trends and potentially transform societal views of migrants.

1 Introduction

Established citizens integrate employment with social and cultural factors. Historical evidence shows us that migrants integrate into their adoptive society, even if they do so at different rates depending on a variety of external and internal factors. The aim of migration policy is to facilitate integration to transform migrants into economically and socially integrated contributors to society as smoothly and rapidly as may be possible. It is neither economical, nor desirable, to treat migrants as having characteristics of culture and employment that require separate interventions. Beneficial integration into society may be more rapid if we assist migrant entrepreneurs to be economically successful, as this requires social integration and skill development which will align migrants with the values and expectations of their adoptive business and social cultures.

A programme of targeted funding within a structure that is attractive to central government, the regions being expected to manage devolved migration and also to migrants is required in order to facilitate the successful economic and social integration of migrants. Satisfying these three requirements in one structure is not a new approach, and it is one in which the UK has some special expertise as a legacy of being in receipt of decades of funding from the EU, funding which has required clear and effective management under stringent auditing regulation. It is logical, therefore, especially in the light of current political trends, to redeploy this expertise in addressing the issues surrounding migrant integration into the same regions that have been

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recipients and managers of EU funding that has featured similar targets regarding education and business development as may be found in the current proposals for devolution of migration.

2 Addressing the barriers

A devolved immigration and integration system could address the issue of cloistering among cultural, ethnic and religious groups. Making periphery regions more attractive for entrepreneurs to start businesses and found long term futures outside of the traditional hubs will reduce the concentration of ethnic populations driving cloistering in the capital and other major urban areas. Devolved funding for migrant socio-economic development provides a catalyst for regional economic growth, including the retention of existing expertise and reduction of reliance on central government funding to support regional economies.

3 Who should this funding structure target?

Migrants now start 1 in 7 of all businesses in the UK. With higher proportions of individuals starting their own business over native citizens, migrants represent a key demographic of business creators and wealth generators. This is focused on London, with 1 in 2 businesses starting in the capital (note). It is necessary to recognise that migrants often come from entrepreneurially successful backgrounds and will wish to be able to develop businesses in the UK. Migrants must be provided with realistically equitable opportunities if they are to be expected to successfully integrate into regional areas.

A devolved immigration system would need to support migrants to start business in order to protect their current productivity. This would entail a package of inter-related services aimed at optimizing their success rates.

Migrants are both numerous and successful at creating businesses in rural areas, but there are issues that the funding model can explicitly address:

- 1) Offering low interest loans to micro and small enterprise start-ups can reduce the impact of undercapitalization of businesses. Migrants who have significant entrepreneurial experience and skills may be inhibited by the lack of financial support available to them through traditional sources such as banks or venture capital.

- 2) Providing ESOL classes through schools and colleges to help migrant entrepreneurs integrate, and improve their economic opportunities by the increased levels of independence that English speaking provides. This may be especially important for the social integration of immigrants who are members of cultures that do not readily support the engagement of women in external culture or labor activities.

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3) Allowing entrepreneurs to set up quickly and effectively to utilise knowledge networks on both local and global scales, which are related (Bathelt & Cohendet, 2014)

4 Preferred characteristics of the structure

The delivery of services must have characteristics that are attractive both to migrants and to UK government at central and regional levels. To be successful the model must blend the requirements of immigrants with the realistic costs and management overheads that will be generated compared with the potential economic and social benefits.

4.1 Positive features for government

Experience with delivery of EU funded projects provides many local authorities outside the London catchment area with a readily available pool of skilled staff and known service providers that can be redeployed gainfully to provide similar services. The retention in employment and economic productivity of economic and social development units in rural and regional areas will be a significant issue now that EU programmes are likely to be significantly diminished in the current political climate, and retention provides recognisable benefits to local and regional authorities which will encourage their active and enthusiastic participation in a devolved migration programme that will have characteristics which may provoke local political and social resistance. A clear case for the economic benefits to local regions, which are economically dependent upon a combination of government and micro-business employment, is an essential feature for the success of any devolved programme, which will otherwise suffer from a lack of local support. Former Objective One funded regions in the UK are excellent candidates for devolved integration of migrant communities for this reason. As an example, the development of the Objective One programme in Cornwall identified that more than 80% of employment was in micro-businesses employing five or fewer staff, usually family based. It is to be expected, therefore, that the local economic environment in these regions be ideally suited to the acceptance and integration of similar businesses set up by migrants. Continued employment of highly skilled individuals in local government to administer and manage a devolved programme is an additional success factor, as is the fact that these individuals are readily recognisable and respected by local councilors and service industries that have benefited under the EU funded programmes and may, consequently, act as ambassadors for the programme.

4.2 Positive features for migrants

To be attractive to migrants, the structure and ancillary programmes must display characteristics that are similar to those that were a feature of EU funding delivery in their clarity and precise targeting.

4.2.1 It must be an accessible and neutral source of information and education.

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Migrant entrepreneurs are often unfamiliar with the rules and regulations of owning and running a business, and often tend to *cloister* and trade within their own community. This tendency is exacerbated by the fact that intermediaries barely understand cultural constraints of new businesses, which encumbers integration. A key objective of funds dispersed through this structure should be to better integrate migrant entrepreneurs as business people first, rather than focusing on regular civic society membership, as the same processes that make them effective members of the business community will also drive social integration. To this end, it is necessary to provide business support in key areas such as marketing, human resource management and financial management for sustainable businesses in an environment that allows interaction with other entrepreneurs to extract valuable information about the context of the market.

4.2.2 Provide ESOL classes in formal environments with sensitivity to cultural values and previous history in education.

If ESOL classes are compulsory*, the aim must be to make them culturally relevant to drive interest and engagement, and to some degree tiered to cater to different levels of expertise. Migrants who wish to set up businesses fall into three main categories in regard to their English language requirements:

1. Migrants with no English language skills - targets for traditional ESOL classes to develop a foundation of knowledge upon which to develop business community integration.
2. Migrants with English language skills who have limited or no business experience - candidates for a business orientated ESOL class that familiarizes migrant entrepreneurs with rules, regulations, regional issues and access to local business networks.
3. Migrants who possess English language skills and successful entrepreneurial experience - language courses that cater to migrants with foreign qualifications can enable a significantly skilled workforce and develop them from overqualified job fillers to effective job creators.

*Implementing compulsory language classes as a *civic course*, as per Belgium as a device to better equip businesses operations rather than as *society* members. In theory, the first will precursor the second when businesses grow and permeate local social structures.

5 How will funding be delivered?

As has been the case with other programmes, local authorities will bid for specific funding under an umbrella of policy driven measures which accommodates for local variation of delivery structure and form, acceding to the requirements of local experts who are better placed to

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determine precise intervention methods, but retaining oversight of the funding delivery based on national requirements. Local authorities will manage service delivery by a set of measures that benefit both the migrants and the local economy:

5.1 The payment of teachers, local business leaders and service providers to distribute necessary knowledge and information in order for new businesses to survive.

Ensuring ME's can speak the local language, learn necessary skills to compete with the modern market and learn what business challenges and opportunities of the area are critical areas to be addressed by an approach that acts local, but thinks global.

5.2 The procurement of education spaces in colleges and schools, SME incubator and accelerator spaces and multi-purpose business units to provide easy access to the market.

The LA must work together with its HE and FE education institutes to provide affordable, purpose built spaces for learning, and professional business environs for businesses with rapid growth potential. Similarly, LAs may want to invest in multi-purpose business premises so that SME's can trade without the commitment of traditional premises costs. Multi-purpose business environs have been extremely successful elsewhere, with Old Street station in London offering a mixture of large and small shops fronts, restaurants, stands and stalls for short-term lease.

5.3 Providing modest and low cost loans to small businesses, a direct investment and endorsement from the government that Britain is 'Open for Business'.

Despite the focus of resources targeting the development of entrepreneurs themselves, funds should be earmarked to invest in businesses that show potential, or are suffering from underinvestment. The onus must remain on training entrepreneurs to *know* when their business requires outside influence rather than applying a policy of direct monetary investment as a stimulant, and outside investment must also not be ignored: financial stimulation often comes from migrants' network, and this tendency of outside investment must be encouraged to offset financial risk on public funds. Match funding of the finances available to migrant entrepreneurs is a model that has been successfully applied under EU programmes, which enables business development but shares the risk with the entrepreneur, reducing the likelihood of default.

The model proposed suggests a regionally led immigration policy that is delivered by local government, but informed by local business. Thus, regional business networks and partnerships have a healthy responsibility to influence the accurate designation of resources, and the fulfillment of goals and objectives set from the top down.

6. Core benefits

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- Government can be seen as *investing* in economic and societal growth by stimulating the market effectively, and investing in migrant entrepreneurs is a worthwhile strategy. Migrant entrepreneurs are effective and low-maintenance investments to make when making a regional market more competitive. They bring new skills and new philosophies that might be successfully integrated into traditional local approaches for mutual benefit.
- Repurposing an existing funding structure that is **auditable, manageable** and **effective** with scope to provide **responsible** influence is in the interest of national and regional government.
- Devolving financial management and enabling local distribution of services and funds by existing experts will both maximize the effectiveness of investment and increase the attractiveness of the proposal to local authorities.

7. Cornwall as a model region

A devolved social integration strategy could face its most difficult challenges in deprived and underdeveloped areas, which currently have very low numbers of migrants. Issues of economic development, social inclusion and increasing skills (which are faced by indigenous populations as well as migrants) have been recognised by the EU as key factors in offering funding to projects that addressed the two key issues of economic development and social inclusion.

Cornwall could provide an effective testing bed for such a policy. As a long-standing recipient of EU Structural Funds, local authorities are experienced in bidding for and distributing funds based on locally designed, nationally sanctioned, models. The universal availability of superfast broadband to the region, provided through EU funding, gives a foundation upon which modern, innovative businesses can thrive. Information technology is the third most popular industry for migrant entrepreneurs to enter into, and with the right conditions, Cornwall could represent an excellent opportunity for technology innovators to augment a developing and nascent market. Funding was also utilised under Objective One to integrate existing educational facilities in Cornwall into a combined university hub and spoke model, which can provide educational opportunities for migrants.

Cornwall's fragile development status and economy based on micro-business and government service delivery offers a suitable test-bed for investigating the effects of devolved integration policy in a stable region. The prevalence of small, family-based businesses provides an environment which may be familiar to migrants, and which may be more ready to accept them as they display similar economic aims to local people. Cornwall's development challenges are echoed in outward migration of young people who, like international migrants, seek opportunities in more heavily urbanized locations. This is an issue that was directly addressed

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by EU funding for local businesses and services and which reduced net migration out of the county.

****Improve mechanisms for moving the funding of smaller businesses away from asset-based criteria to one that is easier for entrepreneurs who may not have the collateral required by most banks.**

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(Bathelt & Cohendet, 2014) The creation of knowledge: local building, global accessing and economic development – toward an agenda in *Journal of Economic Geography*, Volume 14, Issue 5 September 2014

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UNITED AGAINST SEPARATION (UAS)

ABOUT US

UNITED AGAINST SEPARATION is a grassroots campaign group that supports Scotland remaining part of the United Kingdom. With over 90,000 supporters on Facebook we are one of the largest grassroots campaigns opposed to separation.

OUR VIEW

Our primary concern is ensuring the unity of the United Kingdom of Great Britain and Northern Ireland. We strongly oppose any proposals that in any way would create further difference or assist separatist parties in their obsession to destroy our United Kingdom.

ON THE ENGLISH LANGUAGE

(Question One and Two)

We support efforts to increase social cohesion and believe that the English language is essential for such integration. It should be a requirement for all to have a strong understanding of the English language. The English language should also be given official status as the national language of the United Kingdom, to symbolise its importance. There is recognition for regional minority languages, but no such official recognition for the English language.

DEVOLUTION OF IMMIGRATION POLICY

A) To what extent could some of the responsibility for immigration be transferred to devolved governments, metro-regions, Local Enterprise Partnerships, or groups of local authorities?

We strongly oppose any attempt to devolve any power relating to immigration to the devolved administrations or other regions of the United Kingdom. Immigration is a national policy that must be handled by the UK Parliament and Government. Having different immigration policies within the United Kingdom would lead to serious fragmentation, and it would in fact seriously damage social cohesion and integration, rather than help it. Such a policy would further the cause of separatists who seek to break up our country. It would also go against the Smith Commission Agreement signed by all 5 of Scotland's main political parties from 2014 which chose not advocate devolution of immigration policy accepting it should remain a reserved matter.

b) How might the establishment of a regionally led immigration system impact, positively or negatively, on levels of integration?

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It would have a terribly negative impact on integration. Clearly if there are different immigration policies between the regions and nations of the UK that is going to lead to fragmentation. It will in some ways potentially lead to people only choosing to integrate with the one region they choose to live, rather than integration into British society. Such an impact could have devastating consequences and benefit those who seek the breakup of the United Kingdom.

c) How might it impact on the political and public debate on immigration issues?

It would negatively impact on the public and political debate, not just on immigration but also on other matters including the constitution. Devolution of immigration would fundamentally undermine the United Kingdom's Parliament's ability to control the UK's borders, and it could lead to increasing anger against immigration if some parts of the UK are actively increasing immigration numbers whilst other parts of the United Kingdom are wanting to see a reduction in numbers. Especially as it will be very difficult to enforce a separate immigration policy within the United Kingdom. Huge amounts of resources and time would be needed to try and manage such an arrangement.

On the issue of public views. In recent days a survey by NatCen Social Research was published which found 62% of Scots want to see the same EU immigration rules and trade policy as the rest of the United Kingdom. There is no public demand for separate immigration policies, and previous polls conducted have also showed that Scottish people are relatively in line politically with people from other parts of the United Kingdom on attitudes towards immigration.

DRAWING ON INTERNATIONAL EXAMPLES

(Question A and B)

We strongly urge against considering other countries methods as suitable for our own country. When looking at countries such as Australia and Canada it is extremely important to remember these are federal states with very different structures in place and without the severe threat of separatism that we currently face. The United Kingdom is not a federal state it remains a unitary state with devolved institutions responsible for certain local policy decision making.

We strongly oppose any attempt to adopt federalist policies as it would seriously weaken the United Kingdom and would lead to the breakup of the country. It will not create more integration and social cohesion, it will in fact cause more division and segregation.

IN CONCLUSION

We welcome this All Party Parliamentary Group's aim of promoting integration and social cohesion. We just hope that in all of your efforts you do not advocate any proposals that will

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harm the unity of the United Kingdom of Great Britain and Northern Ireland. The SNP do not speak for Scotland. When they advocate devolution of further powers, it is not because it is in the interests of Scotland or what the people of Scotland want, it is because they seek to further their cause of separation and division.

There must be a single UK wide immigration policy with no regional variations, and certainly not with devolution of such powers to the devolved administrations. Control of Borders and Immigration levels must be a matter for the sovereign UK Parliament.

We support efforts to encourage more integration and social cohesion. Instead of looking at devolving more and more powers to the devolved institutions which does harm, British MPs should be supporting policies that will bring all the people of the United Kingdom together in unity.

For example. Why is the United Kingdom one of the only countries in the world without a designated national day to bring people together in celebration of common national identity? A UK national day to celebrate the United Kingdom and its history and heritage could unite all the people of the different parts of the UK no matter what their background. How can we expect immigrants to properly integrate and embrace British identity when we are not ensuring that British citizens across the UK are doing the same? For too long patriotism and national identity has been deliberately undermined and this has benefited the separatists who seek to rip our country apart and it had led to a failure of integration for some migrant communities in Britain.

There are many policies that could be introduced to strengthen the United Kingdom and build social cohesion. We would be happy to share more of our suggestions with this group in the future and hope that you will consider our concerns. The number one priority must be to “do no harm”. Devolution of immigration powers and even just advocating devolving such powers does harm, and we strongly urge against it. Thank you.

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UNITED NATIONS HIGH COMMISSIONER FOR REFUGEES (UNHCR)

- 1) UNHCR welcomes the opportunity to contribute to the second stage of the All Party Parliamentary Group (APPG) on Social Integration's Inquiry. Referring to Principle Three of the APPG's *Interim Report into Integration of Immigrants*, namely that "Government must reassess its current "one size fits all" approach to immigration policy", UNHCR's submission will focus on considerations relating to persons falling within UNHCR's mandate, namely refugees, asylum-seekers and stateless persons. This will include addressing issues relating to English language provision.
- 2) UNHCR has been entrusted with the responsibility for providing international protection to refugees, and together with governments, to seek permanent solutions to their plight. As set out in the 1950 Statute of the Office of UNHCR⁸⁰ (paragraph 8(a)), UNHCR fulfils its mandate by, *inter alia*, '[p]romoting the conclusion and ratification of international conventions for the protection of refugees, supervising their application and proposing amendments thereto.' UNHCR's supervisory responsibility over the implementation of international instruments is also reflected in Article 35 of the 1951 Convention relating to the Status of Refugees and Article II of its 1967 Protocol (1951 Convention),⁸¹ obliging State Parties to cooperate with UNHCR in the exercise of its functions; and is further found in European Union law.⁸² UNHCR has also been formally mandated by the UN General Assembly to prevent and reduce statelessness around the world, as well as to protect the rights of stateless people.⁸³

⁸⁰ UN General Assembly, *Statute of the Office of the United Nations High Commissioner for Refugees*, 14 December 1950, A/RES/428(V), available at: www.refworld.org/docid/3ae6b3628.html.

⁸¹ UN General Assembly, *Convention Relating to the Status of Refugees*, 28 July 1951, United Nations, Treaty Series, vol. 189, p. 137, available at: www.refworld.org/docid/3be01b964.html.

⁸² See, for example, European Union, Declaration on Article 73k of the Treaty establishing the European Community, OJ C 340/134 of 10.11.1997, Declaration 17; Council Directive 2005/85/EC of 1 December 2005 on minimum standards on procedures in Member States for granting and withdrawing refugee status, OJ L 326/13 of 13.12.2005, Article 21(c).

⁸³ See UNHCR *Note on the Mandate of the High Commissioner for Refugees and his Office*, October 2013, available at: <http://www.refworld.org/docid/5268c9474.html>.

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UNHCR and Integration

- 3) UNHCR's interest and involvement in integration stems from its mandate to seek permanent solutions to the plight of refugees. The 1951 Convention explicitly enumerates refugees' social and economic rights and Article 34 obliges States, as far as possible, to facilitate the "assimilation and naturalization" of refugees.⁸⁴ UNHCR has produced various materials relating to integration, including the handbook to guide reception and integration of resettled refugees,⁸⁵ and several publications to facilitate refugees' integration in the European Union.⁸⁶ Additionally, UNHCR's Executive Committee (ExCom) issued a number of conclusions related to integration, such as UNHCR's 2005 ExCom Conclusion No. 104 on Local Integration.⁸⁷
- 4) On 19 September 2016 the New York Declaration adopted by the world's leaders recognized the need for a humane, considered and comprehensive approach to tackling the realities of displacement. The Declaration stresses the need for refugees' integration and inclusion, "with particular reference to access to education, health care, justice and

⁸⁴ UN General Assembly, *Convention Relating to the Status of Refugees*, 28 July 1951, United Nations Treaty Series, vol.189, p137, available at: <http://www.refworld.org/docid/3be01b964.html>. See also *Protocol Relating to the Status of Refugees*, 31 January 1967, United Nations, Treaty Series, vol. 606, p. 267, available at: <http://www.refworld.org/docid/3ae6b3ae4.html>.

⁸⁵ UNHCR, *Refugee Resettlement. An International Handbook to Guide Reception and Integration*, September 2002, available at: www.refworld.org/docid/405189284.html. See also www.unhcr.org/uk/local-integration-49c3646c101.html.

⁸⁶ See, for example, UNHCR *Note on Integration of Refugee in the European Union*, May 2007, available at: <http://www.unhcr.org/463b462c4.pdf>; UNHCR, *A new beginning: Refugee Integration in Europe*, September 2013, available at: <http://www.unhcr.org/protection/operations/52403d389/new-beginning-refugee-integration-europe.html>; UNHCR, *Rights of Refugees in the Context of Integration: Legal Standards and Recommendations*, June 2006, POLAS/2006/02, available at: <http://www.unhcr.org/44bb90882.pdf>; UNHCR, *UNHCR comments on the European Commission proposal for a Regulation of the European Parliament and of the Council on the European Union Agency for Asylum - COM (2016) 271*, December 2016, available at: <http://www.refworld.org/docid/585cde7a4.html>; and UNHCR, *Better Protecting Refugees in the EU and Globally: UNHCR's proposals to rebuild trust through better management, partnership and solidarity*, December 2016, available at: <http://www.refworld.org/docid/58385d4e4.html>.

⁸⁷ UNHCR, *Conclusion on Local Integration*, 7 October 2005, No. 104 (LVI) - 2005, available at: www.refworld.org/docid/4357a91b2.html.

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language training”.⁸⁸ States signatory to the Declaration, including the United Kingdom, committed to reducing the risk of marginalization of refugees, asylum-seekers and stateless persons, and fighting xenophobia, racism and discrimination, while globally supporting the development of national policies relating to integration and inclusion.⁸⁹ UNHCR commends the abovementioned materials to the APPG for its consideration.

Defining integration

- 5) Integration is the end product of a dynamic and multifaceted two-way process with three interrelated dimensions: a legal, an economic and a social-cultural dimension.⁹⁰ UNHCR fully concurs with the need for integration to be a “two way street” process, as defined by the APPG on Social Integration *Interim Report into Integration of Immigrant*, or, as UNHCR also describes it, a “social contract” between refugees and host countries.⁹¹ While refugees should evidently follow the host country’s laws and values, the host societies need to do everything possible to ensure a more effective integration of refugees, while also respecting their cultural identity. This process is thought to rely on ‘adaptation’ of one party and “welcome” by the other. It does not require beneficiaries of internal protection to relinquish their cultural identity as integration differs from assimilation.

⁸⁸ UN General Assembly, *New York Declaration for Refugees and Migrants: resolution/adopted by the General Assembly*, 3 October 2016, A/RES/71/1, paragraph 39, available at: <http://www.refworld.org/docid/57ceb74a4.html>.

⁸⁹ *Ibid.*

⁹⁰ UNHCR, *A new beginning: Refugee Integration in Europe*, September 2013, available at: <http://www.unhcr.org/protection/operations/52403d389/new-beginning-refugee-integration-europe.html>. See also UNHCR, *Rights of Refugees in the Context of Integration: Legal Standards and Recommendations*, June 2006, POLAS/2006/02, available at: <http://www.unhcr.org/protection/operations/52403d389/new-beginning-refugee-integration-europe.html>.

⁹¹ UNHCR, *Better Protecting Refugees in the EU and Globally: UNHCR's proposals to rebuild trust through better management, partnership and solidarity*, December 2016, p. 19, available at: <http://www.refworld.org/docid/58385d4e4>.

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A National Strategy for Integration of Refugees, Asylum-Seekers and Stateless persons

- 6) UNHCR recognises the positive work undertaken in Scotland and Northern Ireland to implement integration strategies.⁹² However, while the Home Office issued strategies for refugee integration in 2000,⁹³ 2005⁹⁴ and 2009,⁹⁵ it has not done so on a national basis since then. There has also been no widespread systematic evaluation of the integration of refugees since the *Survey of New Refugees in the United Kingdom*, between 2005 and 2009, which was published in July 2010.⁹⁶
- 7) UNHCR underlines the importance of having a comprehensive published integration strategy and systematic monitoring and evaluation of integration.⁹⁷ Without this the specific situation of beneficiaries of international protection and the barriers or facilitators to their integration risk being overlooked. Further, the expert support needed to assist this group in becoming economically productive, self-reliant and to help ensure dignity may be diminished.
- 8) Below, UNHCR identifies issues relating to asylum-seekers, refugees and stateless persons that the Government may wish to take into account in developing and implementing a National Integration Strategy, including those relating to the provision of English language.

⁹² The Scottish Government launched their *New Scots: Integrating Refugees in Scotland's Communities (2014 – 2017)* strategy, available at: www.gov.scot/Resource/0043/00439604.pdf. The initiative has been running in parallel with the Holistic Integration Service, the second interim evaluation report of which is entitled *Insight into Integration Pathways, New Scots & the Holistic Integration Service*, whilst the evaluation report of year three is titled *Rights, Resilience and Refugee Integration in Scotland* ([www.scottishrefugeecouncil.org.uk/what we do/policy and research/research reports](http://www.scottishrefugeecouncil.org.uk/what_we_do/policy_and_research/research_reports)). The 2014 Northern Ireland Assembly also commissioned the *Report on Refugees and Asylum Seekers in Northern Ireland* (available at:

www.migrationni.org/DataEditorUploads/RAISE%20Refugees%20and%20Asylum%20Seekers%20in%20NI.pdf), which, *inter alia*, identified a range of concerns relating to asylum-seekers and refugees.

⁹³ Home Office, *Full and Equal Citizens: a strategy for the integration of refugees into the United Kingdom*, 2000.

⁹⁴ Home Office, *Integration Matters: a national refugee strategy for refugee integration*, 2005.

⁹⁵ Home Office, *Moving on Together: government's recommitment to supporting refugees*, 2009, available at: <http://goo.gl/Tb4Fnz>

⁹⁶ Home Office, *Spotlight on Refugee Integration: findings from the survey of new refugees in United Kingdom. Home Office Research Report 37*, 2010, available at: <http://goo.gl/8Vz4Ti>

⁹⁷ UNHCR, *A New Beginning: Refugee Integration in Europe*, September 2013, available at: www.refworld.org/docid/522980604.html.

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Recommendation:

- I. The UK Government, together, where applicable, with the devolved administration, should introduce a coherent integration strategy pertaining specifically to beneficiaries of international protection and systematically monitor and evaluate their integration trajectories.**

English language and schooling

- 9) Knowledge of the hosting state's language facilitates the active participation of children in school and is important for adults to access employment in the host country. Language training should ideally be provided during the asylum procedure, unless it is reasonably foreseen that the asylum-seeker will stay in the country for a period not exceeding a few weeks. To increase its efficiency, language training should be adapted to the divergent learning capacities of asylum-seekers, refugees and stateless persons and convey key information about the host society and its functioning.⁹⁸

ESOL provision

- 10) UNHCR welcomes the September 2016 announcement by the Home Office that the Government would commit £10 million in new funding towards ESOL for Syrian resettled refugees. It should, however, be recalled that this new funding will not benefit all resettled refugees or others with international protection needs in the UK; consideration should be given to strengthening English language provision more widely.
- 11) UNHCR's ongoing survey of the initial reception and integration for Syrians resettled under the Vulnerable Persons Resettlement Scheme (VPRS)⁹⁹ indicates that there are areas in the provision of English language for Syrian resettled refugees that should be improved. In the absence of available alternative child-care and/or child-friendly class times, attending classes is problematic for refugees who have children.¹⁰⁰ Further,

⁹⁸ UNHCR, *Note on the Integration of Refugee in the European Union*, available at <http://www.unhcr.org/463b462c4.pdf>.

⁹⁹ Due to be finalized by mid-2017.

¹⁰⁰ In addition to childcare responsibilities, language provisions should also take into account others factors such as refugees' employment needs and level of literacy, as it has also been pointed out also in Home Office, *English Language training for refugees in London and the region*, available at:

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consideration should be given to increasing involvement in English language courses of low participation groups, specifically, women with young children, men aged between 17 and 24 years old and elderly refugees. The survey is also raising questions about the most successful format of delivery of language provision; absolute beginners, for example, appear to be facing challenges with English only immersion classes that do not provide interpretation support.¹⁰¹

English for employment

12) Reception policies for refugees, asylum-seekers and stateless persons should be designed to minimize isolation and separation from host communities and should provide for effective vocational skills development, and assistance to pursue employment.¹⁰²

13) UNHCR's ExCom has recognized that promoting the self-reliance of refugees from the outset will enhance the sustainability of any future durable solution,¹⁰³ and vocational training is welcomed by UNHCR. Such courses can have an empowering effect as they enable refugees to meet the host population on equal terms rather than as recipients of services. Vocational training may also be beneficial for re-integration upon return of rejected asylum-seekers, as it can open new employment opportunities in the home country. Additionally, the workplace offers opportunities for positive socialization. Employment provides the individual not only with an income but also with independence, social status, and recognition.

Welcoming asylum-seekers and refugees

<http://webarchive.nationalarchives.gov.uk/20110218135832/rds.homeoffice.gov.uk/rds/pdfs2/rdsolr1403.pdf>.

¹⁰¹ See also Refugee Action, *Challenges and opportunities to improve language provision to refugees in England*, May 2016. Available at: <http://www.refugee-action.org.uk/wp-content/uploads/2016/11/letrefugeeslearnfullreport.pdf>.

¹⁰² UNHCR, *Note on the Integration of Refugees in the European Union*, May 2007, available at <http://www.unhcr.org/463b462c4.pdf>.

¹⁰³ The preamble of the UNHCR Executive Committee, Conclusion on Local Integration, No. 104 (LVI) – 2005, argues that self-reliance is “beneficial if promoted before official recognition as a refugee”, available at: <http://www.unhcr.org/excom/exconc/4357a91b2/conclusion-local-integration.html>. See also UNHCR Executive Committee, Conclusion No. 93 (LIII), 2002 para (b)(vii), which has recognized that “reception arrangements can be mutually beneficial where they are premised on the understanding that many asylum-seekers can attain a certain degree of self-reliance, if provided with the requisite opportunities”, available at: <http://www.unhcr.org/excom/exconc/3dafdd344/executive-committee-conclusion-93-2002-conclusion-reception-asylum-seekers.html>.

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- 14) In addition to English lessons, to facilitate integration and success at school, children should also feel welcomed in their classes. UNHCR recognizes that introducing students to refugees, asylum and migration can be a challenging task and has developed teaching toolkits and education material to support teachers in explaining facts, concepts and definitions relating to asylum and migration in Europe.¹⁰⁴ UNHCR encourages the APPG to consider the valuable role these materials may play for persons of concern to UNHCR.

Recommendations:

- II. More focus on and, where needed, greater enhancement of access to the quality provision of ESOL for all refugee should be facilitated. The UK Government may wish to consider broadening efforts to strengthen ESOL beyond refugees resettled under the VPRS, including for other refugees, asylum-seekers and stateless persons.**
- III. The UK authorities should re-examine what format of delivery has been the most successful in terms of ESOL attendance and learning success.**
- IV. English lessons to facilitate employment and vocational training should be supported and, where needed, strengthened.**

Addressing the Consequences of Trauma

- 15) Persecution and displacement can have a serious impact on the mental and physical health of asylum-seekers, refugees and stateless persons. Inadequate reception and integration policies can exacerbate or perpetuate the effects of trauma. It is important to adequately address these issues, especially as incorrect actions may cause significant impairment and long-term suffering.¹⁰⁵ UNHCR highlights, in particular, the importance of those working on integration with vulnerable individuals to be suitably qualified.

Recommendation:

- V. Specific training should be organized for professional working in areas linked to integration, particularly in the areas of health, education and employment, to assist**

¹⁰⁴ See for example www.unhcr.org/uk/not-just-numbers.html and www.unhcr.org/teaching-about-refugees.html.

¹⁰⁵ UNHCR, *Note on the Integration of Refugees in the European Union*, May 2007, available at: <http://www.unhcr.org/463b462c4.pdf>.

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social workers in dealing with refugees' psycho-social needs, reactions to traumatic experiences and pathological conditions

Discrepancies between Official Dates of Births

- 16) Some beneficiaries of international protection originate from countries where birthdays are not culturally or administratively significant and the precise date of birth may have never been recorded or the persons do not possess any forms of identity which indicate a specific date of birth. In these situations the Home Office may provide that an individual's date of birth is 1st of January of a given year. However, the Department for Work and Pensions has been known to designate the same individuals with a 31 December date of birth. The discrepancy in having two officially endorsed dates of birth creates undue hardship whilst navigation through important administrative matters. In the worst case scenario, individuals may face sanctions owing to imputed fraudulent activity by presenting with official documentation showing contrasting birth biometrics.

Recommendation:

- VI. The UK authorities should ensure that the date of birth given to beneficiaries of international protection is consistent between government departments and on official documentation issued.**

Documentation and access to services

- 17) Requirements on schools, landlords, banks and general practitioners' surgeries to verify the immigration status of foreigners may negatively affect the reception and integration of persons of concern to UNHCR. These types of documentation carried by asylum-seekers, refugees and stateless people as well as those with subsidiary or complementary forms of protection can be varied and complex, and could overburden service providers and create misinterpretation about the legality of the individual's status. These challenges may result in unintended consequences such as the denial of housing and other services to asylum-seekers and beneficiaries of international protection, including those who have been resettled. In particular, access to banking facilities can be problematic for a range of reasons including those pertaining to credit

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history, the poor implementation of banking guidelines and unintended consequences of international sanctions.¹⁰⁶

Recommendation:

VII. The types of documentation issued to those recognised by the UK as being in need of international protection should clearly and consistently be explained to service providers by the UK authorities. Access to banking facilities and other services needs to be monitored and acted upon where deemed appropriate

Immigration Detention

18) Detention can have a negative impact on detainees' integration prospects, as it may severely deteriorate the physical and mental conditions of those who experience it.¹⁰⁷ UNHCR believes that immigration detention should apply only when necessary, reasonable and proportionate,¹⁰⁸ and, whenever possible, alternatives to detention should be implemented.¹⁰⁹ The Shaw Review on the Welfare in Detention of Vulnerable Persons, a report to the Home Office published in January 2016, argues that immigration

¹⁰⁶ See for example "The Guardian", *Refugees unable to open UK bank account facing debt and destitution*, 6 January 2016, available at: <https://www.theguardian.com/world/2016/jan/06/refugees-unable-to-open-uk-bank-accounts-facing-debt-and-destitution>.

¹⁰⁷ This is well-documented in the Joint Inquiry of the All Party Parliamentary Group on Refugees and the All Party Parliamentary Group on Migration, *Report of the Inquiry into the Use of Immigration Detention in the United Kingdom*, 2015, available at: <https://detentioninquiry.files.wordpress.com/2015/03/immigration-detention-inquiry-report.pdf>, and in the Stephen Shaw, *Review into the Welfare in Detention of Vulnerable Persons*, 2016, available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/490782/52532_Shaw_Review_Accessible.pdf.

¹⁰⁸ See UNHCR, *Guidelines on the Applicable Criteria and Standards relating to the Detention of Asylum-Seekers and Alternatives to Detention*, 2012 (Detention Guidelines), available at: <http://www.refworld.org/docid/503489533b8.html>.

¹⁰⁹ See UNHCR, *Back to Basics: The Right to Liberty and Security of Person and "Alternatives to Detention" of Refugees, Asylum-Seekers, Stateless Persons and Other Migrants*, April 2011, PPLA/2011/01.Rev.1, available at: <http://www.refworld.org/docid/4dc935fd2.html>. See also UNHCR, *Beyond Detention: A Global Strategy to support governments to end the detention of asylum-seeker and refugees, 2014-2019*, 2014, available at: <http://www.unhcr.org/53aa929f6.pdf>.

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detention powers are “currently being used excessively, harmfully and ineffectively”,¹¹⁰ and it recommends that the Home Office investigate the development of alternatives to detention.¹¹¹ UNHCR welcomes this recommendation and encourages the Government to expand the use of alternatives to detention for refugees, asylum-seekers and stateless persons in the UK. UNHCR also notes that detaining stateless persons is often ineffective as their removal is subjected to extensive delays and sometime it is even impossible, due to their lack of national identity.¹¹²

Recommendation:

VIII. The Government should urgently explore expanding the use of alternatives to detention and ensure that detention is only used when necessary, reasonable and proportionate.

Transition Period

19) The Home Office has responsibility for reception and support arrangements during the asylum process and for beneficiaries of international protection newly receiving status until the end of the 28 day move-on period. This transition requires the issuance of documents and the following of a complex administrative process, as well as intra-governmental co-ordination between relevant departments. Various reports have been

¹¹⁰ Stephen Shaw, *Review into the Welfare in Detention of Vulnerable Persons*, 2016, p.22, available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/490782/52532_Shaw_Review_Accessible.pdf.

¹¹¹ Stephen Shaw, *Review into the Welfare in Detention of Vulnerable Persons*, 2016, recommendation 63, p.190, available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/490782/52532_Shaw_Review_Accessible.pdf.

¹¹² See European Network on Statelessness, *Protecting Stateless Persons from Arbitrary Detention*, 2016, available at: http://www.statelessness.eu/sites/www.statelessness.eu/files/ENS_Detention_Toolkit.pdf. See also UNHCR, *Handbook on Protection of Stateless Persons*, 2014, par 112, available at: <http://www.unhcr.org/53b698ab9.pdf>. See also Conclusion on Identification, Prevention and Reduction of Statelessness and Protection of Stateless Persons Conclusion on Identification, Prevention and Reduction of Statelessness and Protection of Stateless Persons, No. 106 (LVII) – 2006, Executive Committee 56th session. Contained in United Nations General Assembly document A/AC.96/1035 Available at <http://www.unhcr.org/453497302.html>.

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published on coordination issues and gaps in providing support during this period, including by the British Refugee Council and the British Red Cross.¹¹³

Recommendation:

- IX. Work to address the coordination problems in transferring individuals from Home Office support to mainstream welfare support services should continue and be concluded in a timely manner**

Family Reunion

20) It should be emphasised that family separation affects a multitude of areas relating to integration for beneficiaries of international protection. Furthermore, enduring isolation and grief in the absence of family members reduces an individuals' ability to function;¹¹⁴ while living with family members can promote integration by reinforcing the social support system of refugees.¹¹⁵ In addition, increased and enhanced family reunion channels could remove a powerful incentive for many third country nationals to embark on risky irregular travel and move onward in the European Union.¹¹⁶ UNHCR continues to advocate for the strengthening of family reunification standards and procedures in the UK.

Recommendation:

- X. In March 2016, UNHCR released a briefing paper on family reunion in the UK, in which there are twenty-two recommendations made that are also highly pertinent to integration and this inquiry. UNHCR recommends careful and favourable**

¹¹³See British Refugee Council, *28 days later: experience of new refugees in the UK*, 2014, available at: http://www.refugeecouncil.org.uk/assets/0003/1769/28_days_later.pdf, and British Red Cross, *The move-on period: an ordeal for new refugees*, 2014, available at <http://www.redcross.org.uk/~media/BritishRedCross/Documents/About%20us/Research%20reports%20by%20advocacy%20dept/Move%20on%20period%20report.pdf>.

¹¹⁴ UNHCR, *A new beginning: Refugee Integration in Europe*, September 2013, p.127, available at: <http://www.unhcr.org/protection/operations/52403d389/new-beginning-refugee-integration-europe.html>.

¹¹⁵ UNHCR, *Note on the Integration in the European Union*, 2007, available at: <http://www.unhcr.org/463b462c4.pdf>.

¹¹⁶ UNHCR, *Briefing Paper: Family Reunion in the UK*, 2016, available at: <http://www.unhcr.org/protection/basic/576019c67/family-reunion-in-the-united-kingdom-briefing-paper-2016-576019c67.html>.

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consideration of these recommendations by the UK Government.

Challenges faced in the asylum process and statelessness determination procedure

- 21) Due to their precarious legal status, asylum-seekers may experience a certain degree of uncertainty concerning the assistance from the government that they are entitled to receive while their asylum claim is processed. This is particularly evident in the case of the provision of health care assistance¹¹⁷ and concerning asylum-seekers' right to rent a property.¹¹⁸ An additional challenge in the UK is that asylum-seekers can only apply for permission to work to fill a shortage vacancy if they have been waiting for over twelve months for an initial decision on their asylum claim.¹¹⁹
- 22) Stateless determination procedures are an essential mechanism to help facilitate the integration of stateless persons and to reduce their risk of prolonged and arbitrary detention. Whilst UNHCR very much welcomes the introduction of the statelessness procedure in the UK,¹²⁰ it should be noted that the statelessness determination procedure does not provide applicants (and their dependents) with recourse to any

¹¹⁷ See Concluding Observations, 58th session of the Committees on Economic, Social and Cultural Rights, held in Geneva from 6-24 June 2016, available at:

http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=E%2fC.12%2fGBR%2fCO%2f6&Lang=en

¹¹⁸ See Joint Council for the Welfare of Immigrants, *Passport Please: The impact of the Right to Rent checks on migrants and ethnic minorities in England*, February 2017, available at:

https://www.jcwi.org.uk/sites/jcwi/files/2017-02/2017_02_13_JCWI%20Report_Passport%20Please.pdf.

¹¹⁹ House of Commons Library, Commons Briefing Papers SN01908, Should Asylum seekers have unrestricted rights to work in the UK? 11 May 2016, available at:

<http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN01908>.

¹²⁰ The UK is a signatory of the *Convention Relating to the Status of Stateless Persons* and the 1961 *Convention on the Reduction of Statelessness* (See UN General Assembly, *Convention Relating to the Status of Stateless Persons*, 28 September 1954, United Nations, Treaty Series, vol. 360, p. 117, available at:

<http://www.refworld.org/docid/3ae6b3840.html>; UN General Assembly, *Convention on the Reduction of Statelessness*, 30 August 1961, United Nations, Treaty Series, vol. 989, p. 175, available at:

<http://www.refworld.org/docid/3ae6b39620.html>) and the implementation of policies to facilitate the integration and naturalization of stateless persons "must be seriously considered by states which are committed to finding durable solution to statelessness" (The Equal Rights Trust (ERT) *ERT Guidelines to protect Stateless Persons from Arbitrary Detention*, 2012, Guideline 60, p.153, available at:

<http://www.equalrightstrust.org/ertdocumentbank/guidelines%20complete.pdf>)

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form of accommodation or financial assistance, and that the process is long and burdensome for some applicants.¹²¹

Recommendations:

- I. Work to guarantee that asylum claims are processed fairly and efficiently; ensure that asylum-seekers and service providers are adequately briefed on asylum-seeker rights and entitlements; consider expanding access to employment for asylum-seekers.**
- II. Statelessness claims should be processed in a timely manner with adequate support provided to applicants (and their dependents) during the process.**

Resettlement

23) UNHCR projects that 1,190,000 individual refugees will be in need of resettlement in 2017.¹²² UNHCR has and continues to call on States to create or expand legal pathways for admission.¹²³ UNHCR is extremely grateful to the UK Government, both at national, devolved and local levels, as well as civil society, for the international solidarity shown through the introduction and implementation of the various UK resettlement programmes.¹²⁴

24) Although the report is yet to be finalised, observations from UNHCR's joint survey on initial reception and integration for Syrians resettled under the VPRS to-date have been positive of the coordinated and operational response of Local Authorities and regions as well as the politically backed commitment from the Home Office and other relevant

¹²¹ See the British Red Cross, *Can't stay. Can't go. Refused asylum seekers who cannot be returned*, in particular p. 30, available at: <http://www.redcross.org.uk/~media/BritishRedCross/Documents/About%20us/Research%20reports%20by%20advocacy%20dept/Cant%20Stay%20Cant%20Go%20webready.pdf>.

¹²² UNHCR, *UNHCR report puts projected resettlement needs in 2017 at 1.19 million*, 13 June 2016, available at: www.refworld.org/docid/575f97844.html.

¹²³ UNHCR, *Global Responsibility Sharing through Pathways for Admission of Syrian Refugees*, 2016, available at: <http://reliefweb.int/sites/reliefweb.int/files/resources/56f29f579.pdf>

¹²⁴ The traditional Gateway Protection Programme and Mandate Refugee Scheme (www.refworld.org/docid/54339eb45.html); as well as the expanded Syrian Vulnerable Persons Resettlement Scheme, which now also has a recently initiated Community Sponsorship component; together with the new Vulnerable Children's Resettlement Scheme.

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government departments to deliver the VPR. The study has, however, indicated potential challenges for Syrian refugees. These include those related to possible misconceptions in relation to family reunification; in isolated cases, access to timely medical care; access to employment and adequate English language tuition.¹²⁵

- 25) Further, the level of integration support, type of legal status (refugee or humanitarian protection) and availability of travel documentation for resettled refugees varies in the UK depending on the resettlement scheme utilized. This, in turn, may contribute to expectations that are difficult to manage, create divisions between categories of resettled individuals, and between those resettled and those recognised as being in need of international protection ‘in country’ contributing to disaffection.
- 26) The survey and report on initial reception and integration for Syrians resettled under the VPRS will be finalised by mid-2017.

¹²⁵ As mentioned already, UNHCR welcomes the UK’s recent announcement to commit £10m towards language tuition to help Syrians resettled to integrate into British society.

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TO: All-Party Parliamentary Group (APPG) on Social Integration

FROM: The Wonder Foundation

RE: Call for evidence for Stage Two of its inquiry into immigration and integration

INTRODUCTION

The *Interim Report* identifies Six Principles that will guide the development of the new integration programme for the post-Brexit immigration system. While these identified principles are relevant and appropriate to improving UK's approach to integration, the findings and proposals presented in Principle Three and Principle Four are limited, particularly as they relate to the gender dynamic of integration. The Wonder Foundation thus aims to achieve two goals in the call for evidence report: **1.** to critically examine the contents of the APPG's interim report to promote the development of a sound and realistic integration programme, and **2.** to advocate for and present the voice of female immigrants as any new integration programme should be inclusive of all types of immigrants to the UK.

At this stage we need to ask how we define integration. The British Council Report, "[Whose Integration?](#)" states:

...integration is not a fixed state which people attain or fail to attain, but is instead a dynamic ... integration is not a one-way street, or even a two-way street between migrant and 'host' community but is as complex and multi-directional as a 'Spaghetti Junction'.

Discussing the integration of immigrants into British society we remember that UK culture varies between social and geographical groups and is ever-changing.

Additionally, the APPG's definition of 'migrant' fails to recognise the vulnerabilities of some in this category, for example female dependents coming from very gendered cultures, who may be in forced marriages, experience VAWG etc.

PRINCIPLE THREE: GOVERNMENT MUST REASSESS ITS CURRENT 'ONE SIZE FITS ALL' APPROACH TO IMMIGRATION POLICY.

The report recommends a regionally-based or devolved immigration system as it could provide the national government with the means to direct migration flow patterns within the UK. This recommendation is based on the belief that a more equal distribution of immigrants within the UK will bolster regional economies, particularly those that have traditionally attracted few immigrants. Moreover, the Interim Report suggests that the dispersion of immigrants will

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improve an immigrant's ability to integrate. While we agree that improved economic performance and social integration is vital for the UK's future, we are concerned by the approach taken in the report regarding immigrants and integration.

A. PARTNER WITH IMMIGRANT COMMUNITIES TO IMPROVE INTEGRATION.

A key stance of the Interim Report is that immigration to existing and large immigrant communities reinforces social exclusion and poor integration experienced by migrants. The report references a resource provided by the Migration Observatory as academic evidence to support this claim. However, in examining this resource, we found a different perspective to be presented. In fact, the author, Sarah Spencer CBE, is careful to posit a causal link between geographical concentration of migrants and poor integration outcomes. She, instead, focuses on the complex and multi-dimensional aspect of social integration and only lightly suggests that where an immigrant chooses to live may contribute to his/her ability to integrate. Therefore, we find the proposal of "promoting the geographical dispersal of immigrants" to improve overall integration to be one that is lacking in substantive evidence.

Our own research, which we conducted for our consultation report, Empowerment through Education: Women Breaking the English Barrier, also presents a different perspective on the role of immigrant communities on integration. The women we spoke to, all of whom are vulnerable immigrant women in London, discussed how socialising opportunities with other female immigrants helped to diminish their feeling of social isolation. Additionally, community centres and volunteers, who were also interviewed in our report, remarked on the unique role immigrants can play in providing contextualised and needed support and guidance to newer immigrants. Thus, we do not believe in pillorying immigrant communities, as our evidence shows that they are critical to the successful integration of future immigrants to the UK.

B. INTEGRATION IS NOT A ONE-WAY STREET

As other parts of the interim report rightly conclude, integration is a shared responsibility between immigrants and the host community. Unfortunately, what is echoed in Principle Three is disappointingly different. In arguing for a regionally-led or devolved immigration system, the Interim Report implies that this type of system will prevent immigrants from entrenching themselves in social segregation; the perception here is that a regionally-based or devolved system is needed in order to improve an immigrant's own ability to integrate. However simply nudging immigrants to migrate to less concentrated areas will not automatically improve integration outcomes. After all, if the less concentrated areas do not have the capacity or desire to support and welcome immigrants, as well as provide them with the means to participate in society, integration is unlikely to improve.

C. EMPOWER LOCAL OR REGIONAL GOVERNMENTS TO BETTER WELCOME AND SUPPORT IMMIGRANTS

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A shift away from a ‘one size fits all’ policy means empowering and encouraging local and regional governments to challenge their respective established communities to better welcome and support immigrants.

For example, Sarah Spencer CBE (referenced in section A) highlights how the Mayor of London and other local politicians have developed locality-specific integration strategies for refugees and immigrants. She remarks that this type of initiative makes sense as local authorities are closer to the issues affecting immigrants in their respective communities, but are most successful with Government support. She states that the Government can: **a.** provide a normative approach to supporting and welcoming immigrants and **b.** allocate and coordinate funds and resources to support local efforts that promote and facilitate integration. Thus collaboration between the national and local/ regional governments may yield improved integration outcomes.

The findings in our report are consistent with the position above. Many of the women we interviewed had a vested interest in meeting and interacting with more native English speakers but were unable to do so for various reasons. Some simply did not know how to engage with British people socially, both due to language barriers and, in many cases, because they did not have the economic resources or the leisure time to engage in activities alongside British people. These sentiments inspired one of our key recommendations: “Mentoring and befriending of migrant English learners by nationals and better established migrants should also be encouraged and funded at the local and national level.”

We believe that through national and local support, we can create spaces where immigrants and British citizens can have the opportunity to meet each other as peers, citizens and neighbours, and establish the relationships and friendships that are the foundation of integration and lead to natural and sustainable cross-cultural dialogue – the “spaghetti junction” of integration. Ultimately, this may lead to a more sustainable and effective model for inclusion as social integration will be viewed as a shared experience and responsibility.

D. KEY POINTS.

- 1.** Immigrant communities ought to be viewed as an asset for social integration, as opposed to a barrier. The new integration programme should aim to leverage these communities to improve social integration outcomes.
- 2.** Integration is not a one-way street. Any new immigration system should be cautious about adopting the perspective that the burden to integrate falls solely on the shoulders of the immigrant.

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3. The Government should adopt a national strategy for social integration that includes empowering local governments to promote and encourage integration between immigrants and citizens in their respective communities. With local and national governments working together best practices for integration will be reinforced at the national and local levels.

PRINCIPLE FOUR: FOR NEW IMMIGRANTS, INTEGRATION SHOULD BEGIN UPON ARRIVAL IN THE UK

This principle outlines how the UK can shift its current immigration policy to be more focused on integration. The recommendations include: **a.** expanding the national government's role in facilitating integration, **b.** adding an English language requirement where immigrants will either be expected to have learned English prior to arrival or be required to enrol in compulsory ESOL classes upon arrival, and **c.** considering a provision where immigrants could automatically be put on a pathway to citizenship. While we are highly supportive of more integration and English language support for immigrants, we want to ensure that female immigrants will be able to equally participate in and benefit from such opportunities. Additionally, we would like to highlight the importance of evaluating English learning beyond the scope of education.

A. QUALITY ENGLISH LANGUAGE COURSES MATTER FOR SUCCESSFUL INTEGRATION

In our report, [Empowerment through Education: Women Breaking the English Barrier](#), we investigated the English learning experience of vulnerable female immigrants. We conducted in-depth interviews, held focus groups, and completed a literature review with the goal of gaining a better understanding of the challenges they face in learning English. Though we were only able to conduct our field research in London, we were still successful in identifying feasible and pragmatic policies targeted at breaking down the barriers they face. More importantly, we believe that the recommendations below capture the perspective and voices of vulnerable female immigrants.

1. Adopt a national English learning strategy (such as the one proposed by **NATECLA: [Towards an ESOL Strategy for England](#)**) that acknowledges the different learning objectives and preferences (e.g. learning environment, content) of immigrants. For example, the women we interviewed often indicated that oral/aural English proficiency was their main goal.
2. Incorporate provisions within the national strategy that promotes equal access to ESOL. For vulnerable female immigrants, this would mean coupling ESOL with support services targeting self-sufficiency, health and wellbeing, and childcare.
3. Guarantee funding for accredited ESOL classes as they are a valuable option for female learners.

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4. Commit to a full-cost-recovery scheme to ensure ESOL providers are able to reduce administrative burdens that may hamper the delivery of their services, as well as recruit and retain high-quality instructors who are sensitive to the diverse needs of their students.
5. Ensure the pay and hours for ESOL teachers commensurate with their respective experiences and training to improve learning outcomes.
6. Recognise that English learning can take place in different environments (formal and informal) and celebrate the unique role local, community-based and non-accredited ESOL providers in providing welcoming and inclusive learning spaces, particularly for vulnerable female immigrants.

We recommend more comprehensive research to identify best practices for learning English, as this is critical to a successful English learning strategy.

B. ADOPT A WHOLE-PERSON APPROACH TO SOCIAL INTEGRATION

The interim report suggests that English language acquisition is a homogenous experience where outcomes can be improved by offering more ESOL courses. However, acquisition is more complex and multi-dimensional than presented in interim report as the different barriers faced by each immigrant play a critical role in how they are able to learn English. For vulnerable female immigrants, the unique barriers they face can have an immense impact not only on their ability to benefit from but also access English learning opportunities in formal (e.g. ESOL courses) and informal settings. Therefore, initiatives aimed at improving English language acquisition should be adapted to the needs of the immigrants and appreciate that some of the most vulnerable migrants may not have the capacity to learn English.

Through the research conducted for our report, we were able to identify key barriers faced by vulnerable female immigrants to learning English:

1. **Their ability to meet basic needs:** For vulnerable female immigrants, meeting a family's basic needs often means forgoing ESOL courses and working multiple jobs/ split shifts to secure a liveable wage. Consequently, they are unable to attain the English skills needed to move out of the low-wage job(s) that are preventing them from accessing ESOL courses in the first place.
2. **Their health and wellbeing:** Vulnerable female immigrants are often in poorer physical/ mental health. Academic studies indicate that a correlation exists between health and English proficiency - having poor health negatively affects women's ability to learn English and poor English proficiency negatively impacts their health.

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3. **Their care responsibilities:** In many families, childcare falls to the mother and therefore poor immigrant women often cannot attend ESOL courses as they cannot afford childcare.
4. **Their feeling of safety and agency:** Vulnerable immigrant women are exceptionally exposed to exploitation. Those who become victims of abuse can develop a range of symptoms that can persist even after they escape from the abusive environment. Many of these women also face barriers to reporting abuse and seeking assistance. As one might expect, for females who have a limited sense of safety and agency, their daily life is disrupted, which in turn can hinder their ability to commit to and participate in English learning.
5. **Their education level:** Vulnerable female immigrants often faced barriers to formal education in their country of origin. Consequently, they may be illiterate or have low literacy rates, or have limited experience learning in an educational environment. What this means is that they may have a more difficult time learning a new language, like English, as they simultaneously need to develop literacy from scratch.

What is important to recognise is that these are barriers of daily life. Therefore, their impact often extends beyond English learning.

C. KEY POINTS

1. As part of the new integration programme, a national strategy on English learning should be adopted. This is important because guidelines established at the national level can better standardise the quality of education provided, improve access to ESOL classes, and improve coordination amongst the various service providers involved in the English learning experience.
2. Immigrants, particularly those who are female and vulnerable, experience complex and multi-faceted barriers that often preclude them from participating and benefiting from English learning opportunities. More importantly, these barriers are not just limited to English language acquisition but can impact their overall ability to integrate. Therefore, the national government ought to consider how these barriers can be broken down.

CONCLUSION

We commend the APPG on Social Integration for recognising the need to evaluate and improve the current approach to integration. However, we believe that in order to develop a sound, realistic, and inclusive integration programme, the Government needs to:

1. Recognise the important role immigrant communities play in fostering integration

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2. Consistently promote and recognise that integration is not a one-way process,
3. Partner with local or regional governments so they feel empowered to promote best practices for integration,
4. Within the new integration programme, adopt a national strategy on English learning to improve the quality of and access of English learning opportunities, and
5. Recognise the complex and multi-faceted barriers faced by immigrants and examine how it can help to eradicate these barriers to improve English learning and social integration.

We hope that such a programme can be adopted as it will have meaningful impact on current and new immigrants to the UK. More importantly, we believe that this approach will allow the national government to identify appropriate means to measure social integration outcomes.

Wonder Foundation works to empower vulnerable communities worldwide through education.

We partner with locally-led projects in the UK, Asia, Africa, Latin America and Europe that primarily support women and girls and act as a stimulus for ending poverty and improving wellbeing in their families and communities.

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