1. Context and operating environment

St Mungo’s is a diverse organisation made up of volunteers, staff, supporters, and partners from around the world. Each contributes their unique skills and experiences to achieve our shared aim of ending homelessness in the areas in which we work. Many of the clients we support at St Mungo’s also come from across the world.

A migrant is an umbrella term that describes someone who has left their country of origin. There are lots of reasons why migrants might travel to the UK. Some might be seeking education, employment or to join family whilst others might be fleeing poverty, unrest, natural disaster, or other serious risks to themselves and their family.

People who leave their country because they are seeking safety from human rights abuses or persecution are referred to as asylum seekers. Seeking asylum is a human right. Someone who is successful in seeking asylum is granted refugee status and is afforded protection under international law.

Everyone’s story is unique, and each individual brings their own set of skills, ambitions and hopes for the future.

2. Scope of strategy

This strategy sets out our approach to ending migrant homelessness. To ensure there is a route out of homelessness for everyone, it is helpful to think about the following groups:

- Migrants with the right to live and work in the UK who also have access to welfare benefits should they need it.
- Migrants with the right to live and work in the UK who have restricted eligibility to welfare benefits.
- Migrants who have unclear or no immigration status in the UK and who require support to resolve their immigration situation before a long term housing solution can be facilitated.
3. Key external developments since our last Migrant Strategy

- **Brexit**: the UK’s decision to leave the European Union and the subsequent launch of the EU Settlement Scheme in 2019 meant St Mungo’s worked at scale with partners so every individual eligible for the scheme could preserve their right to live and work in the UK.

- **‘Everyone In’**: the availability of Covid-19 emergency accommodation enabled St Mungo’s to provide safe accommodation for individuals whilst they worked with their immigration adviser to resolve their immigration situation and secured a long term housing solution.

- **The Kerslake Commission**: St Mungo’s acted as Secretariat for the commission which was convened in March 2021 to examine the lessons from the emergency response to rough sleeping during the pandemic, and to understand how the learning can be embedded for the future. The Kerslake Commission’s findings were released in September 2021 and included a range of recommendations to address migrant homelessness.

- **Rough Sleeping Initiative (RSI) 2022-25**: RSI funding allocations have included significant investment in immigration advice capacity and represent an opportunity to build and embed learning on how the homelessness and migrant sectors work together.

- **Challenging political climate**: the legislative and policy environment including changes to the Immigration Rules affecting rough sleepers as well as the Nationality and Borders Act have extended the reach of the ‘hostile environment’ and made our work to end migrant homelessness more difficult.

4. What we do already

**We currently deliver wide-ranging and specialist services to respond to the need of individuals who are migrants including those with an immigration support need.**

- **Street Legal**
  Street Legal facilitates immigration advice through our partner advice providers. The service supported over 500 individuals to access advice through the ‘Everyone In’ initiative and led the development of best practice in joint work between homelessness professionals and immigration advice providers. Street Legal ‘Link Workers’ now operate across the organisation to embed this learning.

- **Routes Home**
  Routes Home supports individuals who wish to end their homelessness outside of the UK through safe reconnection to accommodation and holistic support. The team employ a rights-based approach to ensure individuals have independent immigration advice to understand the implications of leaving the UK on their current and future status. They maintain an extensive network of contacts alongside specialist knowledge and expertise to ensure individuals end their homelessness for good.

- **OISC Registration (Level 1 EUSS)**
  St Mungo’s is registered at OISC Level 1 EUSS and over the last two years has supported 250 individuals with advice on the EU Settlement scheme.

- **Welfare Rights Team**
  The Welfare Rights Team provides expert advice to migrants on their rights and entitlements in the context of the complex legislation governing access to benefits. A specialist migrant rights adviser works with welfare rights specialists across the sector to share learning and influence change. During the Financial Year 2021-22 the Welfare Rights Team generated over £1 million worth of additional income for our clients.

- **Employment as a route to accommodation**
  Support to access employment is a critical tool to ending homelessness, particularly for those who have a right to reside but are unable to claim welfare benefits. St Mungo’s has piloted a number of employment projects for migrants including an ongoing partnership with Beam.

- **Roma Rough Sleeping Team**
  The Roma Rough Sleeping Team responds to the cultural needs of individuals who are sleeping rough and from the Roma community. They ensure equal access to services including healthcare, immigration advice and support from adult social care.

  St Mungo’s has recently worked with The Passage and Westminster Council to commission research on the response to Roma Rough Sleeping and is developing knowledge sharing partnerships with organisations in Romania.

- **Matrix Support**
  St Mungo’s Head of Migrants and Advice Services is responsible for developing and sharing best practice and works with partners to respond to live issues. A regular ‘drop in’ session is available to all St Mungo’s staff and tools, resources and best practice are shared on MungosNet, the St Mungo’s internal intranet.
5. Why do we need a strategy?

Level of need

In London, where we have the most accurate data, 48% of individuals who are rough sleeping are migrants.

- 17% are from non-EEA countries
- 12% are from Romania

Whilst the numbers of migrants vary across the areas in which we work, we know we will not achieve our aim of ending homelessness, unless we end migrant homelessness.

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17% are from non-EEA countries
12% are from Romania

Specific needs

Like all our clients, migrants deserve a safe home, access to healthcare and support to enter employment. However, to achieve this they may require additional support to:

- Understand and access their rights and entitlements through qualified immigration and welfare rights advice.
- Recover from complex trauma including trauma that results from long periods of destitution.
- Develop language skills and links with their wider community outside of homelessness services.

Specific risks

Migrants may also be at risk from the following:

- Serious harm as a result of destitution which may also leave migrants vulnerable to exploitation and modern-day slavery.
- Disengagement with services due to fears associated with the Home Office’s Hostile Environment, the manifestations of which contribute to keeping individuals trapped in homelessness.
- Discrimination and/or racism including from services, employers or landlords.

6. Progress since our last strategy

St Mungo’s Migrant strategy 2017-21 was ambitious and comprehensive, however the operating environment of the last three years could not have been anticipated. The Covid-19 pandemic and ‘Everyone In’ initiative provided unique opportunities to innovate and connect with experts in the migrants sector in unprecedented ways. We were afforded a new opportunity to influence others, including through the Kerslake Commission.

In the last four years we have:

- Contributed to strategic partnerships that advocate for the needs of migrants. These include through the ‘Life off the Streets’ governance structure and the ‘Homeless Migrants Advisory Panel’ in London. We also sit on the Rough Sleeping Support Service advisory panel alongside other migrant sector colleagues.
- Heard the voices of clients, partners and stakeholders across the sector to better understand how we can work together creatively to end migrant homelessness through the Kerslake Commission and influenced the Kerslake recommendations.

- Developed partnerships across the areas in which we work to ensure all individuals have access to independent and qualified immigration advice. We are currently working in partnership with over 20 immigration providers and have established a procurement framework for immigration advice provided via Street Legal.
- Produced best practice guidance on our key service delivery models, including Street Legal, Routes Home and supporting Roma rough sleepers.
- Engaged our supporters and funders to understand and fund pathways out of destitution. This has included a significant expansion of the Street Legal Service.
- Piloted and secured ongoing funding for the Roma Rough Sleeping Team.
- Increased routes into accommodation for individuals with unclear or limited entitlement. This began with 12 accommodation units attached to our Street Legal service and was superseded as St Mungo’s led the Covid-19 response and provided emergency accommodation to over 4,000 individuals regardless of their access to public funds.
- Improved our capacity to provide supported reconnection including, in country support through the METRO project.
- Piloted initiatives to support migrants into employment. Our work with the business community including the provision of workers’ accommodation was limited by the pandemic and remains a key priority going forward.
7. Principles and strategic approach

Our work with migrants is driven by key principles

- **Client centred:** we put the individual’s needs and wishes at the heart of their support, so they are empowered to direct their own recovery.
- **Trauma informed:** we recognise that migrants, particularly those with an immigration support need, may have experienced significant trauma and require a psychologically informed response.
- **Culturally competent:** we have a responsibility to educate ourselves on the cultural needs of each individual so we can deliver the support that most meets each person’s needs.
- **Rights based:** our role is to ensure every individual has advice on their rights and entitlements and is supported to make positive decisions about their future.
- **Partnership focused:** our support to migrants is strengthened by strong partnerships with experts across the migrant sector.
- **Evidence based:** we have a key role to play in capturing quality data that evidences the needs of migrants who are homeless, the barriers to ending homelessness and the interventions that work.

8. Barriers to ending migrant homelessness

The changing political climate means the barriers to supporting migrants, particularly those with an immigration support need, are evolving quickly. It is critical that St Mungo’s continues to listen to, and work with, our migrant sector colleagues in order to shape our response.

**Access to advice**

Every individual with an immigration support need must be supported to access qualified immigration advice. This requires sufficient provision to be available and accessible to individuals who are homeless and who may have other support needs that make engagement more difficult. This includes sufficient access to Legal Aid.

St Mungo’s also has a key role to play in identifying individuals who will have a need for immigration advice in the near future and helping them to access advice when needed. This includes where the individual has Pre-Settled status or other Limited Leave to Remain.

**Restricted eligibility**

Welfare legislation is complex and difficult for people who are homeless, as well as homelessness professionals, to navigate without specialist advice. A particular challenge is individuals whose only right to reside is pre-settled status as they cannot rely on this as a route to claiming welfare benefits, if needed. We must find a way to support a significant group of migrants who have the right to live and work in the UK but are at risk of destitution with no route out of homelessness.

**Access to accommodation**

Many individuals who are experiencing homelessness and have an immigration support need have also experienced significant trauma and the process of engaging with immigration advice is likely to be re-traumatising. It is critical that each individual is physically and psychologically safe when accessing advice, however there are very limited accommodation options for those who do not have recourse to public funds.

The ‘Everyone In’ initiative clearly demonstrated that when individuals have safe accommodation alongside immigration advice and wrap around support, they can resolve their immigration situation and end their homelessness for good. We know that the chances of successful engagement with immigration advice without accommodation is much lower. This is incredibly challenging for the individual and not an effective use of resource.

**Training and development**

The response to supporting individuals with an immigration support need via the EU Settlement Scheme and through ‘Everyone in’ has shown what can be achieved when the homeless and migrant sector work together at scale. However, it has also demonstrated the need to bridge the gap between the knowledge and skills of our respective staff.

We must develop our training and resources so our staff are confident:

- Supporting individuals who have an immigration support need to access and engage with advice and identify appropriate routes away from the street.
- Providing a culturally competent service that meets the wider needs of migrants beyond resolving their immigration situation. This should take into account their skills and experiences as well as specific risks such as modern day slavery.
Equal access to services

The hostile environment continues to create fear amongst migrants and cause disengagement from services. Alongside this, a lack of knowledge from some statutory services can prevent migrants from receiving the support they are entitled to. This includes access to healthcare as well as appropriate responses from Adult Social Care in line with their duties under the Care Act. Similarly, delays and poor decision making from the DWP can create further challenges. More work is needed to challenge discriminatory practice, upskill professionals and remove administrative blockers to ending homelessness for migrants.

Home Office Policy

The practical implications of the hostile environment have led to individuals who are experiencing homelessness facing significant barriers to resolving their immigration situation. This includes evidence thresholds which are more challenging for those who are experiencing or have experienced homelessness to meet, as well as the financial barriers to submitting applications. In addition, there are significant delays to decision making when an application has been submitted with some individuals waiting up to a year for a decision.

Changes to immigration rules in December 2020 mean migrant rough sleepers could have their leave cancelled or refused as a result of rough sleeping if, for example, they are deemed not to be engaging in ‘support.’ This is an incredibly concerning development that punishes individuals for being homeless, pushes vulnerable individuals away from services and further increases the risk of destitution and exploitation.

The Home Office has stated an intention to issue 28 days enforcement notices to EU nationals who have not yet applied to the EU Settlement Scheme and there remains the ongoing risk of enforcement actions to all migrants with unclear or no entitlements.

The Nationality and Borders Act, which came into law in April 2022 contains concerning measures including changes to the Asylum system which risk further increasing homelessness amongst vulnerable migrants and exasperating the climate of fear that prevents individuals accessing the support they are entitled to.

9. Core challenge

If we are to achieve our aim of ending homelessness in the areas in which we work by 2025, we must also end migrant homelessness, including where individuals have unclear or limited entitlements.

To meet this challenge we must listen to the individuals we are supporting, our staff, our colleagues in the migrant sector and our partners, commissioners and funders. We must work together with creativity and tenacity to test new approaches, scale up interventions that work and influence policy change.

10. Our 10 strategic objectives

1. Work with our clients, staff, migrant sector colleagues and other partners to ensure that the migrant voice is front and centre of our work.
2. Develop excellence standards outlining best practice when supporting migrants that can be monitored through St Mungo’s quality assurance framework and which can be rolled out across the sector.
3. Provide staff and volunteers access to training, policies, procedures, and resources so they have the skills, knowledge and expertise to provide the highest quality support to migrants in all areas of our work.
4. Ensure every individual we work with who has an immigration support need has access to qualified immigration advice and is supported to safely and fully engage with it.
5. Ensure the needs of migrants are captured and addressed in all areas of St Mungo’s matrix work. This should pay particular attention to health, support for women and LGBTQIA+ community, move on and employment and skills.
6. Connect with partners and funders to increase accommodation options for individuals who are working to resolve their homelessness through innovative commissioning, and service design.
7. Design service models that promote employment as a route out of homelessness and include ‘in work’ support.
8. Create partnerships that develop best practice when meeting the wider needs of migrants including access to health, education, training and links to the wider community.
9. Evidence the needs of migrants who are homeless or at risk of homelessness, the barriers they face to ending their homelessness and demonstrate the success of interventions.
10. Work alongside the migrant sector to challenge policies and practices that risk causing destitution and prevent individuals from avoiding and ending homelessness.

Next steps
In the first quarter of the implementation of this strategy we will develop an action plan to underpin the delivery of this strategy.
For further information please contact:

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