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**Item No: 11**

**Meeting Date: Wednesday 29<sup>th</sup> November 2023**

## **Glasgow City Integration Joint Board**

**Report By: Susanne Millar, Chief Officer**

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### **Impact of Home Office Decisions via the Streamlined Asylum Process**

<b>Purpose of Report:</b>	To update the Integration Joint Board on (i) the impact on Glasgow City HSCP of Home Office decisions via the Streamlined Asylum Process which will result in circa 2,500 batched asylum decisions in Glasgow by the end of the calendar year; (ii) the associated impacts; and (iii) the preparations being made to respond.
<b>Background/Engagement:</b>	<p>In June 2023, the UK Government announced a streamlined asylum process to address the significant backlog of asylum decisions and reduce the numbers of asylum applicants in contingency and dispersed accommodation. Work is currently being undertaken by GCHSCP to mitigate the impact of the significant increase in demand for refugee services and accommodation in Glasgow.</p> <p>A report was presented to Glasgow City Council's Emergency Committee on <a href="#">12<sup>th</sup> October 2023</a> which highlighted the operational impact of this decision.</p>
<b>Governance Route:</b>	<p>The matters contained within this paper have been previously considered by the following group(s) as part of its development.</p> <p>HSCP Senior Management Team <input type="checkbox"/></p> <p>Council Corporate Management Team <input type="checkbox"/></p> <p>Health Board Corporate Management Team <input type="checkbox"/></p> <p>Council Committee <input checked="" type="checkbox"/></p> <p>Emergency Committee</p> <p>Update requested by IJB <input type="checkbox"/></p>

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	Other <input type="checkbox"/> Not Applicable <input type="checkbox"/>
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<b>Recommendations:</b>	<p>The Integration Joint Board is asked to:</p> <ul style="list-style-type: none"><li>a) Note the content of this report;</li><li>b) Note the financial impact of this decision could cost £53.4m;</li><li>c) Note that the UK Government have said they are not providing funding to cover these costs;</li><li>d) Note the operational impact of this decision, the limited capacity within available accommodation in the city and the requirement for increased use of B&amp;B and hotel accommodation;</li><li>e) Note that the situation could unfold extremely rapidly, and officers may need to make urgent decisions to respond to destitution; and</li><li>f) Note Glasgow City Council are considering available routes in escalating these matters to the Home Office and UK Government as well as any legal avenues given the wider financial, reputational and economic implications.</li></ul>
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**Relevance to Integration Joint Board Strategic Plan:**

<p>The requirement to support people to live within their communities and to protect those in need from harm is part of the strategic priorities of the IJB. Meeting the needs of those who enter the system via the asylum process contributes to meeting the priority Strengthening communities to reduce harm. The issues identified within this paper in meeting the needs of this population relate to the strategic priority to build a sustainable future.</p>
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**Implications for Health and Social Care Partnership:**

<b>Reference to National Health &amp; Wellbeing Outcome(s):</b>	The activity referred to in this paper relates to all nine health and wellbeing outcomes.
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<b>Personnel:</b>	Meeting the targets for processing applications and the ongoing support needs of those whose applications are processed will have a significant impact on staffing within the HSCP working within Asylum and Refugee and Homelessness teams. The staffing needs/costs of providing a response to the increased demand are outlined within section 3 of this report.
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<b>Carers:</b>	None
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<b>Provider Organisations:</b>	Work is currently being undertaken by the HSCP to mitigate the impact of the significant increase in demand for refugee services and accommodation in Glasgow. This will require multi-agency working across the HSCP/GCC/COSLA/RSLs/Third Sector.
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<b>Equalities:</b>	The decision that this report seeks to respond to was taken by the UK Government's Home Office and as such there is no equality impact assessment attached. It is highly likely that the impact of responding to the Home Office decision will include increased demand and unmet need in the asylum and homelessness population in the city, which will have a disproportionate impact on vulnerable citizens, including some with protected characteristics.
<b>Fairer Scotland Compliance:</b>	The impact of responding to the Home Office decision will likely have a negative effect on people within the city that are already suffering from socio-economic disadvantage and the HSCPs ability to offset this will be limited.
<b>Financial:</b>	<p>The potential cost to the HSCP could be as much as £53.4m taken as a full year effect and based on known numbers.</p> <p>The UK Government have confirmed that they will not provide any financial support to dispersal areas impacted by these batched decisions</p>
<b>Legal:</b>	The impact of the additional applications processed will increase the risk that the statutory obligation to provide assistance to those granted leave to remain and who present as homelessness will be breached. This carries the substantial subsequent risk of judicial review.
<b>Economic Impact:</b>	The requirement to respond to the support needs that emerge as a result of the decision will place the Council and IJB under further financial strain and could result in subsequent economic pressures across the city.
<b>Sustainability:</b>	Taken within the context of existing and increasing pressures in relation to the IJB's budget, the financial impact of responding to this decision will generate further risks to the financial sustainability of the IJB.
<b>Sustainable Procurement and Article 19:</b>	None
<b>Risk Implications:</b>	Significant risk of breaching statutory responsibilities in relation to the provision of accommodation required under homelessness legislation. There are also significant financial risks in relation to delivering a balanced budget and use of reserves, ability to deliver the Strategic Plan, risk of negative media coverage and reputational damage and dissatisfaction amongst citizens in relation to increased demand and delays in receiving services. Section 5.2 of this report provides more detail on risks.

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<b>Implications for Glasgow City Council:</b>	Glasgow City Council carries the risk of breaching statutory responsibilities and judicial review, as well as the risk of reputational damage and negative media coverage.
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<b>Implications for NHS Greater Glasgow &amp; Clyde:</b>	The increase in demand created by additional applications and positive decisions will result in increased demand for health services.
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<b>Direction Required to Council, Health Board or Both</b>	
<b>Direction to:</b>	
1. No Direction Required	<input checked="" type="checkbox"/>
2. Glasgow City Council	<input type="checkbox"/>
3. NHS Greater Glasgow & Clyde	<input type="checkbox"/>
4. Glasgow City Council and NHS Greater Glasgow & Clyde	<input type="checkbox"/>

### 1. Purpose

- 1.1 To update the Integration Joint Board on (i) the impact on Glasgow City HSCP of Home Office decisions via the Streamlined Asylum Process which will result in circa 2,500 batched asylum decisions in Glasgow by the end of the calendar year; (ii) the associated impacts; and (iii) the preparations being made to respond.
- 1.2 The potential cost to the HSCP could be as much as £53.4m taken as a full year effect and based on known numbers.
- 1.3 The UK Government have confirmed that they will not provide any financial support to dispersal areas impacted by these batched decisions.

### 2. Streamlined Asylum Process

- 2.1 Glasgow has been a proud dispersal city for more than two decades and Glasgow City Council has repeatedly affirmed its belief that asylum seekers are welcome in Glasgow and have added to the diversity of our city.
- 2.2 In June 2023, the UK Government announced a streamlined asylum process to address the significant backlog of asylum decisions and reduce the numbers of asylum applicants in contingency and dispersed accommodation.
- 2.3 In essence, the streamlined process applies to households from countries who are more likely to receive a positive asylum decision - these countries being Afghanistan, Eritrea, Libya, Syria, and Yemen.
- 2.4 When a person receives a positive decision, they are given 28 days to leave the accommodation that is provided by Mears. At that point, any household that has received leave to remain in the UK can seek assistance to the Local Authority under homelessness legislation.

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- 2.5 The homelessness application will be processed in the normal manner with those with leave to remain having the same rights to emergency and settled accommodation as any other household. Beyond this, asylum seekers in any part of the UK can make a homelessness application in any local authority area, as they are deemed not to have established a local connection during their stay in Home Office accommodation.
- 2.6 In April this year more than 600 positive decisions were made in Glasgow which required a major response from our asylum refugee team.
- 2.7 This figure has since translated to increased homelessness applications and an increase in the use of hotel and B&B placements, particularly for single males. There are currently 170 households with positive decisions which were made in April staying in Hotel/B&B accommodation.
- 2.8 This has put significant additional pressure on the rest of the homelessness service and has led to a rise in rough sleeping in the city. Limited accommodation options remain to deal with the further decisions that the Home Office are due to make in the coming weeks.
- 2.9 Working in partnership with COSLA, and based on current data and recent experience, the following impact would be estimated:
- There is likely to be an additional 2,500 asylum decisions made with 1,800 of these decisions likely to be positive decisions (i.e. leave to remain)
  - Approximately 77% of households who receive a positive decision would go on to make a homelessness application with the local authority, representing an additional **1,386** homelessness applications by the end of December 2023
  - Households who receive positive asylum decisions and go on to make a homelessness application are more likely than the domestic homelessness population to require temporary accommodation, since they do not have the same ability to draw on family or social support in the city
  - Additional positive decisions could mean that **1,026** (of the 1,386 households above) will likely require temporary accommodation pending an offer of settled accommodation being made
  - Around 82% of homelessness applications made by those who were previously asylum seekers result in a permanent tenancy being secured. This would suggest the HSCP would need to secure **an additional 1,138 lets** to meet this increase in demand
  - This additional demand will increase the current ask of RSLs for 60% of available social lets in the city for homeless households
  - If these additional lets cannot be met (there is already a shortfall of around 1,600 properties to deal with current pressures) this will lead to people spending longer periods in scarce and costly hotel/B&B accommodation
  - If this cannot be sourced it could lead to an increase in rough sleeping.

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- 2.10 Further to the pressures laid out above, it is also anticipated that Glasgow may see an increase in those seeking to access homelessness services from cities outwith the city. In the last 6 months, 147 applications were made from households who had received their leave to remain elsewhere in the UK but chose to present in Glasgow as homeless. The approximate cost of accommodating this number in hotels for a full financial year is £5.671m. Given that Scottish legislation (unlike English legislation) does not recognise accommodation provided by the Home Office as establishing a local connection, Glasgow must accept cases which emanate from other countries within the UK.
- 2.11 In addition to the positive decisions, COSLA have also indicated that there is likely to be around **700** negative asylum decisions. These households will have No Recourse to Public Funds (NRPF), and therefore have no rights to access homelessness services.
- 2.12 There will be additional pressure on the local authority especially in cases where there are children involved or where households are presenting with additional social care needs i.e., mental health issues which can often be prevalent in a population who have experienced trauma.
- 2.13 Given the scale of these figures there is every likelihood that Glasgow will see an increased pattern of people with NRPF rough sleeping like other parts of the UK requiring intense outreach capacity from third sector, health and social care support for those who are deemed most vulnerable. For those families with children the local authority retains a statutory role in providing accommodation through section 22 of the Social Work Scotland (1968) Act and must acknowledge that this will have a further bearing on financial pressures.

### 3. Resources

- 3.1 As a result of the Home Office decision, the number of people likely requiring homelessness assistance will increase and the HSCP's Homelessness Service will find it exceedingly challenging to meet the additional demand. There is particular concern in relation to the HSCP's capacity to:
- Respond to the level of new demand from asylum seekers who have received positive asylum decisions who can seek assistance under homelessness legislation
  - Provide all the necessary support to promote community integration
  - Coordinate ongoing health and education needs for families who will be required to relocate across the city
  - Provide arrangements for those with complex needs including those with complex disabilities etc
  - Provide emergency accommodation for asylum seekers
  - Secure permanent accommodation.

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The cost of the additional staffing resource for a 2-3 year fixed term period is detailed below.

- 1 Full Time Grade 8 Team Leader - £76,699 (inc on-costs)
- 1 Full Time Grade 7 Social Worker - £63,155 (inc on-costs)
- 2 Full Time Grade 7 Senior Social Care Workers - £126,310 (inc on-costs)
- 1 Full Time Grade 6 Business Support - £51,955 (inc on-costs)
- 3 Full Time Grade 6 SCWs - £155,865 (inc on-costs)
- 1 Full Time Janitor/Security Guard - £35,908 (inc on-costs)

### **TOTAL STAFFING COST - £509,892**

These figures remain conservative estimates and we will be required to consider the enhancement to our Asylum Bridging Health Team once we are clearer on the pace of these projections.

- 3.2 Beyond the funding issues, given the additional requests for emergency accommodation it is unlikely that the HSCP would be able to source the number of accommodation placements to meet demand. Furthermore, any placement would be within commercial hotels which would lead to a significant rise in the number of breaches of the Unsuitable Accommodation Order, which could in turn see the Local Authority subject to legal challenge.
- 3.3 In addition to capacity within the HSCP's services, it is also unlikely that third sector partners, such as Flexible Homelessness Outreach Support Services would have the capacity to provide support to these additional households without significant increases in staff which would present further financial challenges.
- 3.4 Given the outlined housing and emergency accommodation challenges within the city it is highly likely that an alternative source of accommodation will be required.
- 3.5 This will require extensive scoping and a return to contingency planning arrangements previously considered during the planning for Ukrainian arrivals such as rest centre scenarios. We acknowledge these arrangements will be less than adequate and will likely generate legal challenge and reputational risk as well as exacerbating longer term health and wellbeing problems for those affected.
- 3.6 This situation could unfold extremely rapidly, and officers may need to make urgent decisions to respond to destitution.

## **4. Financial Implications**

- 4.1 A report to the IJB in [September](#) highlighted an overspend of £21.4m for the IJB. This included a £10.1m overspend in Homelessness Services. This outturn reflected current demand pressures for this service but did not include the scale of positive decisions which has been highlighted by the latest

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information from the Home Office. This is due to the timing and the ongoing discussions which has taken place with the Home Office around the financial challenge this would place on these services.

- 4.2 It is difficult to estimate how quickly asylum-seeking decisions will be taken by the Home Office, however, we are anticipating that the number and pace will increase.
- 4.3 We have costed two different scenarios for Glasgow City. For both, we are maximising the allocation of all refugee funding available to us, some of which is one off from the Scottish Government and therefore is not recurring and will have financial impacts in 24/25.

### **Scenario One – Assumptions - Worst Case Scenario**

- 2,500 asylum applications, of which 1,800 receive a positive decision
- Of these 77% (1,386) make a homeless application and of these 77% (1,026) require temporary accommodation
- Decisions are taken at pace and are made within a 9-week window
- Cost of B&B is £120 per day net of housing benefit
- 6 months costs for cases which come from outwith Glasgow
- Additional staffing Costs of £0.510m included

**Outturn would increase from £10.1m to £27.6m.**

### **Scenario Two – Assumptions – Current Rate of Decisions**

- Current rate of positive decisions continues at the pace we experienced at the start of the year
- This will reduce the number of homeless applications requiring temporary accommodation in 23/24 to 692 (compared to 1,026 above) and also stagger these more evenly across the remainder of the year
- Cost of B&B is £120 per day net of housing benefit
- 6 months costs for cases which come from outwith Glasgow
- Additional staffing Costs of £0.510m included

**Outturn would increase from £10.1m to £15.8m**

- 4.4 It should also be noted that these proposals are predicated on existing hotel/B&B costs which are under immense pressure. In the event a financial framework was available to support this approach we would be required to source additional hotel /B&B accommodation which we anticipate would be more costly. It should also be noted that larger family-based hotel provision will also cost considerably more than the estimated £120 per night.
- 4.5 At this stage we cannot advise what the most likely scenario will be in relation to the financial challenges, and it will be dependent on the Home Office's capacity to respond to this volume of applications.



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- 4.6 There is no doubt however that it has the potential to be significant and add to a service area which is already under pressure. The full year implications for 24-25 also need to be considered especially given that the cost implications for 23-24 have been reduced because of the non-recurring funding which has been received.
- 4.7 If all 1,026 applications proceed **it represents an additional pressure of £53.4m** for this service in 24-25 in addition to the underlying budget pressure of £16.7m, representing a potential total budget pressure of £70.1m for 24-25.
- 4.8 This cannot be managed by the IJB and assistance would be required to fund this gap and discussions with Glasgow City Council (as per the provisions outlined within the [Integration Scheme](#)) and the Scottish Government will take place.
- 4.9 The UK Government have confirmed that they will not provide any financial support to Local Authorities to deal with these pressures.

## 5. Mitigations and actions

- 5.1 Work is currently being undertaken by the HSCP to mitigate the impact of the significant increase in demand for refugee services and accommodation in Glasgow. This will require working multi-agency working across the HSCP/GCC/COSLA/RSLs/Third Sector.

Actions being taken forward include:

- Glasgow HSCP have re-established fortnightly asylum pressures multi agency meetings including health and social care senior management, Asylum Bridging Health Team, third sector, NRS , COSLA, Police Scotland, DWP, Education, and property and development team (Chaired by Assistant Chief Officer Public Protection)
- Proposed staffing structure in response to emerging risks now drafted which will widen support for assessment and support including those at most risk.(led by Asylum Head of Service)
- Risk register has been created and subject to fortnightly multi agency review
- Engagement with Homelessness third sector partners have occurred with work streams identified to support increasing B & B population. (Asylum Pressures Group)
- Glasgow HSCP Chief Officer initiated meetings with colleagues in other authorities across the UK stimulating consensus on concerns and requirement for common modelling in response to risk.
- Retaining risk management approach as described in June IJB report and limiting impact of local connection in the absence of a financial framework being applied. ( HSCP Homelessness Services)
- Scoping out appropriate large properties, owned by Glasgow City Council, that can be utilised as first stop accommodation for refugees with positive decisions. (GCC to Lead)

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- Liaising with the Home Office and Mears to receive additional information in relation to the plans for decision making i.e., speed of decision making (HSCP/COSLA)
- Providing briefings and additional information to wider GCC and HSCP services including Education, Health, and Social Work teams.
- Closely collaborating with locality homelessness teams, temporary accommodation team, etc. to ensure that all services are aware of the forthcoming changes.
- Liaising with RSL partners to provide updates on the current situation and the impact that this will have on the HSCP's Local Letting Plan. (HSCP Homelessness Services)
- Work is underway in considering any viable options for refurbishing existing properties that could offer a solution to the proposed increase in demand. There should be an acknowledge however that any options will likely incur significant capital costs, time and a requirement to provide in reaching support.
- Options of rest centre type scenarios are also being considered however experience has informed that these options are significantly limited.

5.2 There are a number of obvious risks and it is proposed that a formal risk register is developed. The risks include:

- Safeguarding/health and wellbeing risks to the asylum population effected by positive asylum decisions who will be required to reside in temporary emergency accommodation for extended periods.
- Longer term financial planning for Ukraine has yet to be confirmed. Glasgow currently have circa 250 Ukrainian Displaced Persons (UDP) residing in hotels and 80 residing in host family arrangements. Scottish Government are currently focusing on the reduction of warm welcome hotel accommodation however clarity on the longer-term financial support for UDP who present as homeless remains outstanding.
- Social Unrest connected to the acceleration of asylum seekers leaving Mears properties
- Social Unrest/Risks to integration as the needs of the asylum seeking population is balanced with an already overheating homelessness system
- The projections in this report will have a significant impact on Glasgow City HSCP strategic priorities as described in our Rapid Rehousing Transition Plan (RRTP) and will principally impact upon our ability to reduce the use of Hotel/B&B accommodation for our homeless population.
- Inability to balance budgets in HSCP and GCC. There is a requirement to seek legal advice on the financial impact likely to occur and scenario planning based on proposed modelling will be necessary.
- Glasgow Homelessness Services are experiencing a steady increase in judicial reviews. This is likely to increase given the lack of available accommodation and the HSCP inability to fulfil some statutory functions.
- Glasgow is currently experiencing a small increase in rough sleeping which is subject to weekly review however there should be an acknowledgement that this will increase further with a likelihood that single males will be adversely affected especially those with negative decisions and subject to NRPF.

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- Glasgow HSCP homelessness Service are now reporting a shift in the proportion of positive asylum seekers residing in hotels. Positive asylum seekers now account for 170 out of the existing 710 residing in hotels which is increasing weekly.

5.3 There is an additional risk that our proposed figures could be larger. This view is based on the attractiveness of Glasgow as a large metropolitan city with the view that the city offers greater opportunities for employment etc. Since the relaxation of local connections in November 2022 these options have become more available for anyone residing in outlying local authorities. It is reasonable to assume this will compound the existing risks given the current trend of people arriving from other local authorities.

## 6. Recommendations

6.1 The Integration Joint Board is asked to:

- a) Note the content of this report;
- b) Note the financial impact of this decision could cost £53.4m;
- c) Note that the UK Government have said they are not providing funding to cover these costs;
- d) Note the operational impact of this decision, the limited capacity within available accommodation in the city and the requirement for increased use of B&B and hotel accommodation;
- e) Note that the situation could unfold extremely rapidly, and officers may need to make urgent decisions to respond to destitution; and
- f) Note Glasgow City Council are considering available routes in escalating these matters to the Home Office and UK Government as well as any legal avenues given the wider financial, reputational and economic implications.