

About CIH

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals and their organisations with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world.

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CIH contact:

John Perry, CIH policy adviser
john.perry@cih.org

Summary of our key points

CIH has been contributing to policy development and promoting good practice in community integration for at least 15 years. This response reflects that knowledge and experience although inevitably our contribution is limited by the scope of the green paper and the need to focus on the issues of place and community. Our key points are:

- We believe the government's new definition of an integrated community avoids some of the problems of earlier definitions. Nevertheless, in addition to positive steps to promote integration, CIH believes that there is a need for stronger emphasis on changing negative perceptions, reducing discrimination and fighting hate crime.
- An effective strategy needs serious resources. The promised £50 million is a very small sum. Furthermore, the strategy is launched at a time when resources are still being withdrawn from local areas on a huge scale affecting the facilities and services on which the strategy depends.
- The government repeats views that greater segregation is taking place, whereas the evidence is, at best, mixed. CIH believes that more needs to be done to assist integration in outer estates, suburbs and rural areas which are currently the least mixed.
- The strategy rightly emphasises the importance of speaking English. CIH warmly welcomes the proposed review of ESOL provision and calls for it to be properly funded.
- Community facilities (such as libraries) and local places in which people can interact are rightly seen as vital in promoting integration. The strategy makes no acknowledgement of the cuts which have been made in the budgets for

such services, the huge loss of facilities and the consequent effects on communities.

- The ‘whole government’ approach promoted in the strategy should extend to the Home Office and its ‘hostile environment’ policies, highlighted in the recent Windrush cases. These have a serious effect not only on migrants’ ability to feel welcome and to integrate but on host communities’ attitudes.
- New migrants tend to go to other migrants for help to settle, or to trusted organisations. Many voluntary groups and advice centres have disappeared or reduced their services as a result of recent cuts: government could look for ways to resuscitate and sustain these services, which often draw in volunteer support from both migrant and longstanding communities.
- Building on good practice is important, as the strategy acknowledges. CIH has led the way in documenting good practice in this field, most recently with our Sector Showcase on *Promoting Better Community Relations*.¹

For ease of reference, the specific consultation questions are referred to in the Annex with links to how they are dealt with in the main text.

Definition of ‘integrated communities’

CIH welcomes the government’s new definition of an integrated community and believes that it avoids some of the problems of earlier definitions.

Nevertheless we would caution against being overambitious. Our 2007 good practice guide pointed out that the main aim should simply be that people ‘...feel reasonably comfortable and accepted in an area and get on with [other] people, but not that they are necessarily engaged in a range of local groups or are community activists’. To achieve this, in addition to positive steps to promote integration, there is a need for stronger emphasis on changing negative perceptions, reducing discrimination and fighting hate crime. We are looking to the Integrated Communities Strategy (ICS) to do this.

Resources

CIH is disappointed at the very limited resources promised to back up the strategy. The ICS acknowledges that ‘tailored local plans and interventions are needed’ yet it is far from clear how these can be launched in the present climate. The government is running its Controlling Migration Fund, which is financing some potentially useful projects, but the section of the fund to do this (£100 million) is very limited (it appears to have funded about 50 projects) and the last bids have now been accepted.

¹ See

www.cih.org/publication/display/vpathDCR/templatedata/cih/publication/data/Sector_showcase_promoting_better_community_relations_PDF_only

CIH believes that the ICS should be accompanied by a more significant, ongoing fund, aimed specifically at promoting integration and moving beyond the narrow ‘controlling migration’ objective.

Speaking English

The government says that some 770,000 people are unable to communicate in English. The actual Census data show 1.3% unable to speak English ‘well’ but only 0.3% ‘not at all’. The greatest number of people unable to speak English well are actually in the ‘White Other’ group and most of those not able to speak it all are older people.

However, CIH agrees that ‘...recent migrants should learn to speak and understand our language’. The ICS pays little attention to the withdrawal of facilities for second-language (ESOL) learning: funding was cut in real terms from £202m in 2009/10 to £98m in 2015/16, leading to a commensurate fall in numbers of students.² Funding was then merged with the wider Adult Education Budget and can no longer be identified.

CIH therefore warmly welcomes the proposal to develop a new strategy for ESOL and that it is to be community-based. CIH believes that the ICS should lead to a significant growth in the ESOL budget, preferably ring-fenced, as this is the best way to assist newcomers who want to speak English (and far more effective than requiring English to be learnt overseas, or imposing new visa requirements relating to language).

Segregated communities

The ICS refers to the conclusions of the Casey Review, saying that there is evidence of ‘a worrying number of communities, divided along race, faith or socio-economic lines’. However, the evidence is far from clear. The ICS cites evidence from Ted Cattle, but Cattle acknowledges that the different ways of viewing segregation produce different results, which he cites in his paper.³

In fact there is separate evidence from the Census pointing to steady *desegregation* of neighbourhoods: practically all ethnic groups became more residentially dispersed in 2001 and then in 2011, compared with 1991 (the only exception was the Chinese, who were already dispersed). More residential mixing has occurred since 2001, so that a White British person is now rather more likely to have a neighbour from a different ethnic group than they were a decade earlier.⁴ This is the case particularly in cities with large ethnic minority populations such as Leicester and Birmingham.

² House of Commons Library (2017) *Briefing Paper: Adult ESOL in England*. London: HoC.

³ Cattle, T. & Kaufmann, E. (2016) *Is Segregation Increasing in the UK?* (see www.opendemocracy.net/wfd/ted-cattle-and-eric-kaufmann/is-segregation-on-increase-in-uk).

⁴ Jivraj, S. & Simson, L. (2015) *Ethnic Identity and Inequalities in Britain*. Bristol: Policy Press.

It is therefore important to recognise the complexities of the situation, and to accept that there is a natural process of desegregation occurring. As Cantle says, the number of wards which have a population of 98% or more White British is less than a fifth of what it was in 2001. The ICS should devise policies that encourage this. In the future, the areas that will become less segregated will be outer estates, suburbs and rural communities. In many of these areas, incoming ethnic minority households are likely to be more at risk of racism. The ICS could usefully have policies to assist diversification in areas which are now predominantly 'White British' and where ethnic minorities are likely to want to live in future.

Discrimination and hate crime

The ICS points out that there is an ongoing problem of racial prejudice reflected in public attitude surveys, together with a significant recent increase in hate crime. The ICS says nothing about the influence of the campaign to leave the EU, even though there is evidence that the recent hate crime increase was biggest in areas that voted most strongly to leave.

About two-thirds of council and housing association tenants voted for Brexit, and attitudes towards migrants among people living in estates and neighbourhoods with social housing might have worsened as a result of anti-immigrant messages during the campaign. Although as yet there is no indication of direct links between social housing areas and increased hate crime, landlords will want to be vigilant in ensuring that relationships between tenants do not result in such incidents and that community relations do not deteriorate.

CIH encourages social landlords to take an active role in tackling hate crime, and after the referendum produced a *How to...* guide on the issue.⁵ This both sets out good practice that should be followed, and gives examples from the many social landlords already actively tackling hate crime.

Taking a whole government approach

CIH strongly agrees with the ICS on this issue, aiming to create 'a country that works for everyone, whatever their background and wherever they come from'. In this respect we believe that the strategy should urgently be accepted by the Home Office and it should:

- No longer run campaigns such as the 'go home' vans which fuel racial prejudice.

⁵ CIH (2016) *How to... Tackle Hate Crime* (see www.cih.org/publication-free/display/vpathDCR/templatedata/cih/publication-free/data/How_to_tackle_hate_crime).

- Review in detail the discriminatory effects of the ‘right to rent’ legislation, as called for by CIH and others, and endorsed by the Independent Chief Inspector of Borders and Immigration.
- Cease to mix immigration enforcement work with housing support work such as dealing with rogue landlords, ‘beds in sheds’ and rough sleeping, as this prejudices the success of initiatives to improve housing conditions and tackle homelessness by prioritising immigration enforcement.
- Cease using destitution as a tool of migration enforcement, because of its effects not only on migrants but on the communities where they try to survive; encourage housing providers to support projects like ‘Hope’ in Birmingham and the Boaz Trust in Manchester, or more widely through the NACCOM network, which aim to provide accommodation to destitute migrants and in some cases help them resolve their immigration status.

We are encouraged by the ICS’s assertion that the government will be ‘unflinching in shining the spotlight on ourselves and others’.

Support for newly arrived migrants

CIH welcomes the commitment to offer more support, especially the measures to offer support to refugees. However, we have long called for integration to be seen as a process that begins when someone applies for asylum, not when they eventually get refugee status, as this has a big impact on how well they can integrate once they receive leave to remain.

CIH strongly believes that providing a welcoming environment will require the government to go further, for example:

- Recognise that provision of information packages is of limited help. New migrants tend to go to other migrants for help, or to trusted organisations. Many voluntary groups and advice centres have disappeared or reduced their services as a result of recent cuts: government could look for ways to resuscitate and sustain these services, which often draw in volunteer support from both migrant and longstanding communities. There were ideas about this (and other issues) in the guide produced by the Housing and Migration Network.⁶
- Strengthen ESOL provision (rather than tightening requirements on migrants to learn before entering the UK, which is often unsatisfactory). Learning English in Britain can be a very useful contribution to integration in itself, as well as acquiring the language.

⁶ Housing and Migration Network (2012) *A UK guide to issues and solutions*. Coventry: CIH for JRF.

- When revamping the Life in the UK test, address its serious deficiencies⁷ and ensure that it focuses on real everyday issues for migrants, such as access to housing, their rights as tenants, paying rent, etc.
- When reviewing the Home Office's COMPAS asylum accommodation contracts, ensure that these are again a source of community support and integration, rather than simply a 'warehousing' exercise which can stoke community resentment (e.g. the infamous 'red doors' in Teesside).
- Be flexible about fostering different local approaches, not necessarily focussing on one method (e.g. the planned network of 'community-based conversation clubs').

Above all, government should recognise that the 'hostile environment' policies that were highlighted by the recent Windrush cases have a serious effect not only on migrants' ability to feel welcome and to integrate but on host communities' attitudes. If the ICS is to be properly cross-government in its approach, the lessons of Windrush not only for older migrants from the Commonwealth but for migrants more generally, must be taken on board. This has implications for housing as well as for other public services.⁸

Mitigating community segregation

CIH welcomes the support for housing measures that would help create more integrated communities ('...determine what changes to housing policy and practice would help in addressing residential segregation'). CIH draws the government's attention to the widespread good practice set out in various CIH reports. For example, *Breaking Down the Barriers* involved an extensive survey of the attitudes of Asian households in Bradford, showing a considerable willingness to move away from 'traditional' neighbourhoods, and this work was followed up by the city council and by local housing associations.⁹

There have been plentiful examples in other areas, such as Rochdale. CIH's own good practice guide has numerous examples and sets out good practice principles for creating and sustaining 'mixed' communities.¹⁰ We note that CIH work is heavily cited in the background research for the ICS by Sheffield Hallam University.¹¹ There is undoubtedly a willingness among social landlords to address these issues.

⁷ See www.opendemocracy.net/uk/john-perry/is-britain-about-anything-other-than-battles

⁸ See www.theguardian.com/housing-network/2018/may/30/hostile-environment-what-social-landlords-need-to-know

⁹ Ratcliffe, P. *et al* (2001) *Breaking Down the Barriers*. Coventry: CIH for Bradford City Council.

¹⁰ Perry, J. & Blackaby, B. (2007) *Community Cohesion and Housing*. Coventry: CIH.

¹¹ Archer, T. & Stevens, M. (2018) *Housing, integration and segregation: A rapid literature review*. Sheffield: Sheffield Hallam University.

Many of the ICS's proposals are specific to the new Integration Areas, but there are only a limited number of these. It is important that methods successfully trialled in these areas are quickly rolled out to other areas too.

Strengthening leadership

CIH supports the aims of this section of the ICS. The Housing and Migration Network's report, *UK migration: the leadership role of housing providers*,¹² explored this issue in some detail and gave examples of what effective leadership can achieve, taking as an example Greater Manchester's work to integrate new migrants that required cross-authority and cross-organisational agreements and commitment. Several housing associations in this area took part in the CIH-HACT *Opening Doors* project on migrant integration, whose final report also has lessons here.¹³

CIH urges the government to take action to implement its promise that it wants '...the voices of women and people from ethnic minority groups to be heard'. The best way to do this is to revive the practice of fostering local community support organisations, as used to be the case (for example) in the Home Office's refugee integration strategies. There are numerous examples of how local authorities, social landlords and other organisations can foster such groups, if of course resources are available. Many housing-related examples can be seen in HACT's Accommodate project.¹⁴

Supporting communities to adapt to migration

CIH welcomes the recognition in the ICS of the range of approaches needed to help communities adapt to migration. We would again draw attention to the examples of housing organisations contributing to this, set out by the Housing and Migration Network.¹⁵ This stressed similar issues to those set out in the ICS, offered guidance on tackling them and examples of successful approaches. It responds to the ICS's point that solutions can often be found to problems by looking at experience elsewhere.

However, we reiterate our point about the scale of the task, the resources needed and the difficulties in finding these in a time of austerity. We urge the government to provide ongoing funding to back up its strategy. This would help fulfil the ICS's promise to '...make sure local authorities get the help they need to deal with people as they arrive'.

¹² See www.jrf.org.uk/report/uk-migration-leadership-role-housing-providers

¹³ Perry, J. (2009) *Opening Doors: Improving housing services for refugees and new migrants*. Coventry: CIH and HACT.

¹⁴ See <https://hact.org.uk/accommodate>

¹⁵ Housing and Migration Network (2012) *A UK guide to issues and solutions*. Coventry: CIH for JRF.

Places and Community

CIH supports the majority of the measures set out in the chapter on this topic. We commented earlier about housing's role in promoting integration.

Our responses to specific questions about the role of housing are as follows:

- *Additional work to pursue rogue landlords.* This should be seen as a wider task of enforcing tenants' rights in the private rented sector, but is severely inhibited by the cuts which have taken place in enforcement work. Government is urged to include the resource issue in the review which it undertakes. As noted above, it is also urged to separate the tackling of rogue landlords from the Home Office's immigration enforcement work, as this creates a climate of fear among tenants (whether or not they have proper documents) and makes them less likely to complain about poor conditions and exploitation.
- *Key indicators of integration/segregation.* As our discussion of this issue indicates, different measurements produce conflicting results. There is also the issue of obtaining accurate data between censuses. However, we suggest that *attitudes* are more important than measures based on ethnicity. Clearly, prevalence of hate crime is one (extreme) indicator of attitudes, and it is important to continue monitoring it. In the absence of a national survey of community attitudes, however, and despite there being many local studies to provide examples,¹⁶ it seems unlikely that local authorities will have resources to carry out surveys at neighbourhood level.

The ICS lists various methods of support for economically disadvantaged areas. However, it should recognise that, with the demise of housing renewal programmes and the more recent ending of the housing market renewal pathfinders, whole areas of older housing, especially in northern England, are now getting very little resource input. Of course, many of these older areas also have high proportions of ethnic minority inhabitants. This is a major gap in current housing policy which is not addressed by current programmes such as those for estate regeneration.

The ICS calls for libraries and similar community hubs 'to maximise their contribution to building integrated communities'. CIH strongly supports this but would point out that almost 500 libraries have closed since 2010, and the effects of cuts on other community hubs (Sure Start centres, youth centres, etc.) has been much greater still. The government should recognise the effects of these closures on poorer neighbourhoods, which have not only reduced the opportunities for community interaction but may have helped stoke resentment against incoming migrants.

¹⁶ For example, a number that were sponsored by JRF. See www.jrf.org.uk/report/housing-and-neighbourhood-impact-britains-changing-ethnic-mix

In short, many of the ICS's proposals on places and community make sense, the crucial issue is one of resources: how can facilities or services be provided at an adequate scale, in all the areas where better integration is needed, without a serious commitment of additional resources?

Annex: Responses to consultation questions

Introduction: Building Integrated Communities

We define integrated communities as communities where people - whatever their background - live, work, learn and socialise together, based on shared rights, responsibilities and opportunities. Do you agree with our definition?

Yes – see p.2

We believe that the varied nature and scale of integration challenges means that tailored local plans and interventions are needed to tackle the issues specific to particular places. Do you agree?

Yes

Do you have any examples of successful approaches to encourage integration that you wish to highlight, particularly approaches which have been subject to evaluation?

Yes – examples throughout text.

Chapter 1: Strengthening Leadership

The Green Paper proposes that we need to build the capacity of our leaders to promote and achieve integration outcomes. Do you agree?

Yes – see p.6

Chapter 2: Supporting New Migrants and Resident Communities

The Green Paper proposes measures to support recent migrants so that they have the information they need to integrate into society and understand British values and their rights and responsibilities. Do you agree with this approach?

We have reservations about the approach – see p.5

The Controlling Migration Fund was constructed to deal with the short-term migration pressures and associated costs that local authorities can encounter. Do you think it adequately achieves this objective?

No – much greater funding is needed – see p.2

Chapter 4: Boosting English Language

The Green Paper proposes a number of measures to improve the offer for people to learn English. Do you agree with this approach?

We are very concerned about the cuts in English language teaching and ask that they be restored – see p.3

Chapter 5: Places and Community

The Green Paper proposes measures to ensure that people, particularly those living in residentially segregated communities, have opportunities to come together with people from different backgrounds and play a part in civic life. Do you agree with this approach?

We are in broad agreement but we make a number of detailed points in response – see various points in the text.

Chapter 7: Rights and Freedoms

The Green Paper proposes measures to encourage integration and resist divisive views or actions. Do you agree with this approach?

We are in broad agreement but we make points about the ‘whole government’ approach (p.4), hate crime (p.4) and mitigating segregation (p.6).