



Six months on

The UK's response to the humanitarian crisis in Ukraine,
and how the government can better protect refugees

27 September 2022

Dora-Olivia Vicol **Adis Sehic**



TABLE OF CONTENTS

1	Executive Summary	3
2	Introduction	5
3	The Ukraine visa schemes	7
3.1	The Ukraine Family Scheme (UFS)	8
3.2	The Ukraine Extension Scheme (UES)	8
3.3	Homes For Ukraine (HFU a.k.a. The Ukraine Sponsorship Scheme)	9
4	Where the Ukraine schemes fall short	10
5	Issues facing Ukrainian refugees in the UK	13
6	Structural issues	19
6.1	Local authorities struggle to address homelessness	19
6.2	An inaccessible private rental sector	24
7	Conclusions and recommendations	26
7.1	Improving the design of the Ukraine Schemes	26
7.2	Perfecting implementation	28
7.3	Supporting Ukrainian Refugees' integration in the long-term	29

1 EXECUTIVE SUMMARY

On 24th February 2022, the Russian military began its full-scale invasion of Ukraine, a democracy of 44 million people. With over 7 million refugees recorded to date, this is the biggest humanitarian crisis Europe has seen since WWII, testing the resilience of Ukrainians, the compassion of the European public, and the inclusivity of immigration systems.

Six months on, this report reviews the UK's response to the humanitarian crisis, the risks faced by Ukrainian refugees, and the steps the UK government should take to protect them.

The Ukraine schemes. While the UK government has made considerable efforts to respond quickly by introducing three visa schemes for Ukrainians, we argue that significant limitations remain in the design, the implementation, and the underlying approach to refugee integration underpinning the schemes.

By design, the schemes are only open to Ukrainian citizens and their close family members, potentially excluding as many as 450,000 people who ordinarily reside in Ukraine, but who lack Ukrainian citizenship. They also exclude Ukrainians who were living in the UK when the invasion started, but lacked a valid immigration status. In treating them like undocumented migrants, rather than refugees, the schemes deprive this vulnerable population of Ukrainians of a key means of regularising their status, entrenching their social immobility, and increasing the risk that they turn to exploitative work on the black market to get by.

Important limitations are also visible in the implementation of the Ukraine schemes. Only one of them, namely the Homes for Ukraine Scheme, offers financial support to refugees, their hosts, and local authorities, even though Ukrainians on the Family and Extension Schemes experience similar, if not more acute, needs. Notably, payments are not adjusted with the cost of living or the size of refugee families, which in turn reflects the government's reactive, piecemeal response to the crisis, that is lacking a long-term strategy for refugee integration.

The integration needs of Ukrainian refugees. Our survey with 191 Ukrainian refugees finds that, six months after the Ukraine schemes were rolled out, they face acute risks of homelessness and poverty:

- 1 in 10 Ukrainians were threatened with eviction at some point of their stay in the UK, with risks particularly high for those on the Family Scheme.
- More than two thirds have little or very little confidence in their ability to find accommodation in the private rental sector, citing high rents, high deposits, and other financial barriers such as the need for guarantors.
- Less than a third have found employment in the UK, with the main barriers including difficulties with English, translating qualifications, but also the absence of transport and childcare, which speak to bigger structural issues restricting social mobility across the UK.

Recommendations. While the survey is not representative of all Ukrainian refugees, we believe that the severity of needs identified warrants urgent government action. In the short term, we would urge the government to:

- Tackle the risk of refugee homelessness - with measures to prevent eviction, such as increasing and harmonising payments across the Ukraine schemes, but also with measures that mitigate homelessness, by consolidating local authorities' approach to homelessness relief, and by supporting refugees to access the private rental sector.
- Support refugees' access to the private rental sector – by allowing them to passport the £350 “thank you payments” from sponsors to landlords, and by testing ways for local authorities to use the £10,500 payments granted by DHLUC to fund deposit and rent guarantee schemes.
- Facilitate refugees' entry to the labour market – with tailored employability support, access to English language classes, and means of transferring qualifications and experience acquired abroad.

Beyond the actions needed in the short term, we argue that the humanitarian crisis in Ukraine is also presenting the government with an opportunity to rebuild, and pursue its long-term goal of levelling up. To this end, we encourage DHLUC, the Home Office, and local government to:

- Develop a strategy for refugee integration – by monitoring and regularly reviewing the effectiveness of Ukraine-specific measures, with a view to improve the UK's approach to refugee integration overall.
- Develop a strategy for social mobility – by recognising the fact that the barriers encountered by Ukrainian refugees who struggle to access secure accommodation and employment in the UK, are also the barriers faced by low-income households, parents, and residents across the country, particularly those in rural locations.

2 INTRODUCTION

Russia's invasion of Ukraine has been felt the world over, sending markets tumbling,¹ inflation soaring,² and the very notion of peace and stability in Europe at risk.

The sheer scale of the conflict has triggered the largest refugee crisis seen in Europe since the outbreak of WWII.³ According to UNHCR statistics from September 2022, the total number of refugees^a from Ukraine that have been recorded across Europe stands at over 7 million and counting, with over 1.6 million refugees recorded in the territories of Hungary, Romania, Slovakia, Poland and Moldova alone.⁴ In addition, over 6 million people have been internally displaced within Ukraine, and the country has seen over 13,000 civilian casualties.⁵

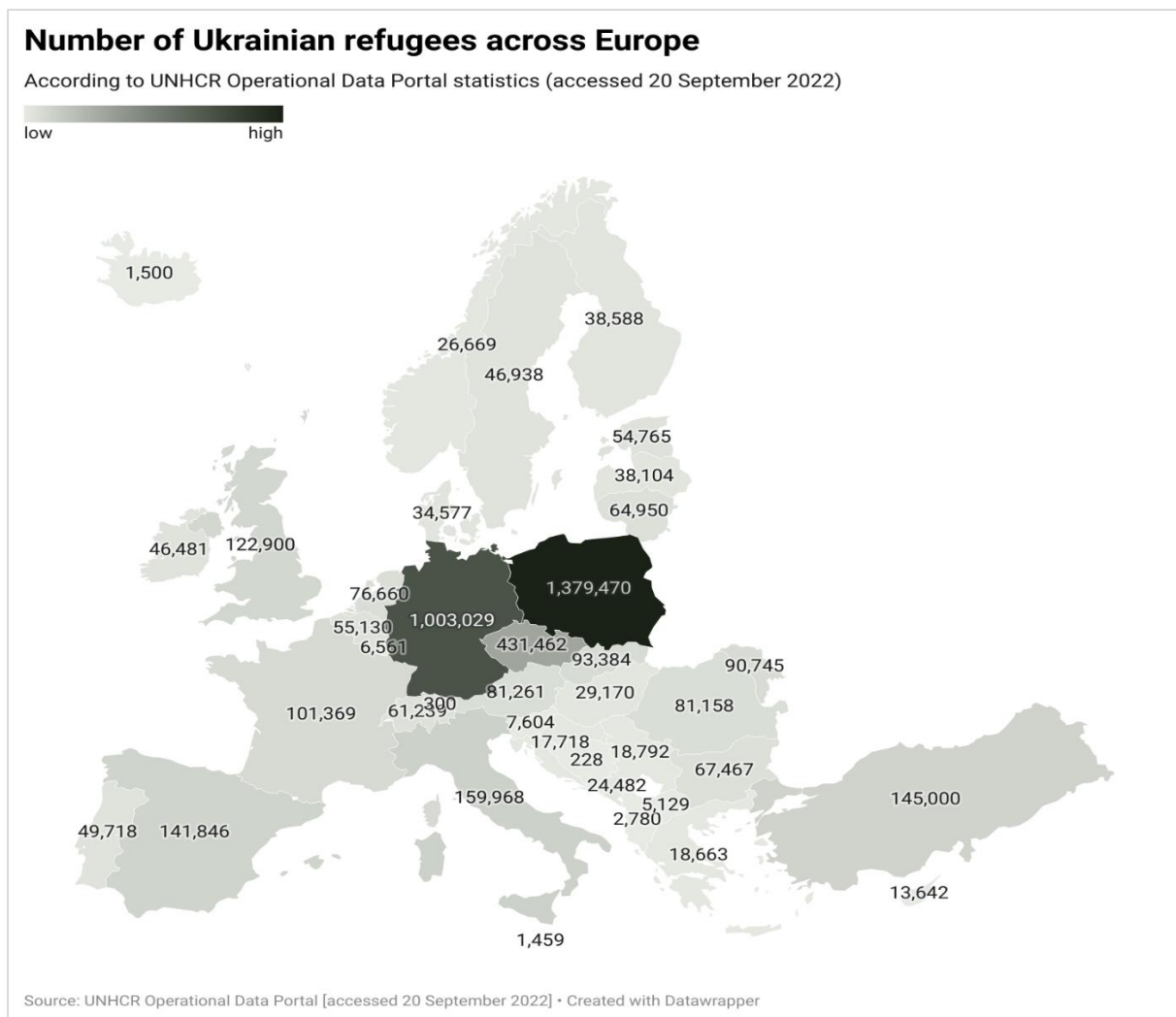


Figure 1. **Number of Ukrainian refugees across Europe.** Source: UNHCR Operational Data Portal, Ukraine Refugee Situation. Published 20 September 2022

^a The term *refugee* is used to denote the population who are leaving, or unable to return to Ukraine, as a result of the Russian invasion. It is important to note that most Ukrainian arrivals to the UK have not been granted formal refugee status under the Geneva Convention. This matters both in terms of the process of obtaining status, and the rights associated with this. To learn more about, visit <https://www.refugeecouncil.org.uk/information/refugee-asylum-facts/>

The war is also likely to cause significant economic damage. According to the IMF World Economic Outlook, Ukraine is likely to experience a severe double-digit drop in GDP, and Russia is facing a similar prospect. Beyond the region, increases in fuel and food prices are likely to affect low-income countries the most, but also send shockwaves worldwide. Global growth is projected to slow from an estimated 6.1% in 2021, to 3.6% in 2022 and 2023.⁶ Within the UK, analysts expect that the increase in the cost of living (July's inflation figures were the highest since 1982)⁷ will result in a fall in income of 10 per cent between 2021-2022 and 2023-2024, which is twice the 5% fall experienced between 2009-2010 and 2011-2012, after the financial crisis.⁸

In this report, we examine the UK's response to the humanitarian crisis unleashed by the war in Ukraine, and what the Government needs to do to mitigate the risks faced by Ukrainian refugees long-term. By September 2022, more than 186,500 visas were issued under the Ukraine schemes, and 129,000 Ukraine Scheme visa-holders arrived in the UK.⁹ If, during the first few weeks of spring, the Government's attention was focused on giving Ukrainians an entry pathway into the UK, without emulating the visa-free policy of the EU, we argue that six months since the war, a new series of risks are emerging.¹⁰

Drawing on data from a survey with 191 Ukrainian refugees to the UK, we find that urgent action is needed to tackle the risks of homelessness, unemployment, and social immobility. In the short-term, this action needs to focus on mitigating the imminent risks of rough sleeping, as 1 in 10 Ukrainians are threatened with eviction, and councils struggle to cope with homelessness demands. In the longer term however, the Government needs a strategy for refugee integration and social mobility. The housing precarity faced by Ukrainian refugees today is not an isolated episode, but the outcome of years of under-investment in social housing stock, which have left councils struggling, and previous refugees from Syria and Afghanistan stuck in temporary accommodation for over a year.¹¹ It is also the outcome of a lack of action to improve access to the private rental sector more generally, which have left a generation of young and low-income Britons unable to find secure accommodation. To address the formidable challenge triggered by the humanitarian crisis in Ukraine, and to pursue its long-term goal of levelling up, we argue that the UK government needs not only to react, as it has done so far, but to rebuild. This report explains how.

3 THE UKRAINE VISA SCHEMES

The international response to the outbreak of conflict was swift. On 4 March, the EU triggered the Temporary Protection Directive, allowing all those fleeing the war to enter an EU country and claim protection from the local authorities upon arrival.^b Under the Directive, arrivals are entitled to residence, access to healthcare, and a right to work.

In a contrasting approach, on 1 March 2022 the UK government announced a series of visa-based reforms to the UK's immigration system that would provide direct support for those individuals fleeing the conflict in Ukraine.¹² What has since followed is the creation of three schemes, which give Ukrainian nationals and specific family members of any nationality the right to stay in the UK for an initial three-year period, as well as work, study and claim means-tested benefits. The government also launched a "Ukraine helpline" to provide UK visa support for Ukrainian nationals, although anecdotal evidence from caseworkers has questioned its utility.

In this chapter, we take a closer look at the schemes. According to the latest Home Office data from 20 September 2022, 186,500 visas were awarded under the Family and Sponsorship Schemes, out of a total of 217,200 visa applications received, and 129,000 Ukraine Scheme visa-holders had arrived in the UK. In addition, applications for permission to extend existing stays in the UK totalled 24,600, with 18,200 of these being granted.¹³ Overall, we argue that while application success rates were high, important limitations remain.

First, the schemes exclude third-country nationals who ordinarily live in Ukraine, but lack Ukrainian citizenship or a family relationship with an eligible Ukrainian national. Second, there is an inconsistency in the level of support offered by the UK government across the schemes, with payments provided to sponsors and councils hosting Ukrainians under the Sponsorship Scheme, but not for Ukrainians with status under the Family or Extension Schemes. Third, the discrepancy between the success rates of applications made from outside of the UK, and those made by Ukrainians from within the UK indicates that, underneath the claims of solidarity, the Home Office retains a firm stance against undocumented migrants. As other charities have remarked, the UK government's response to the humanitarian crisis unleashed by the war has been reactive, piecemeal, and driven by an unprecedented level of public solidarity with refugees.¹⁴ At its core, the Home Office appears to continue to maintain a hard-line approach against undocumented migrants, which is likely to perpetuate the precarity of Ukrainians without a valid immigration status, despite them lacking a safe country to return to.

^b Some countries such as the Netherlands no longer offer protection for third-country nationals who had a temporary residence permit before they fled Ukraine.

3.1 THE UKRAINE FAMILY SCHEME (UFS)

The UFS is open to individuals who wish to come to, or remain in the UK, by joining family members who are British citizens or have specific types of immigration permission. Applicants must be Ukrainian nationals or third country nationals who have a family relationship with a Ukrainian citizen, and who are allowed to apply to prevent the break-up of family units.¹⁵

Each individual, including children, must make separate applications to the scheme, and each individual must have been living in Ukraine on or immediately before 1 January 2022. For their part, family members in the UK must be British citizens, or have indefinite leave to remain, refugee status, humanitarian protection – or, after an initial period of confusion, hold settled or pre-settled status under the EUSS.¹⁶

A total of 61,800 visa applications were received under the UFS from Ukrainians seeking to come to the UK, and 52,000 visas were successfully issued.¹⁷ This places the overall success rate of UFS visa applications at 84%, with the remaining applications either withdrawn, refused or awaiting their conclusion by the Home Office. In addition, 8,900 applications were received, and 7,200 were issued to Ukrainians wishing to extend their stay in the UK. At around 81%, the success rate of in-country applications to the UFS remains high – albeit lower than for applications submitted from abroad.

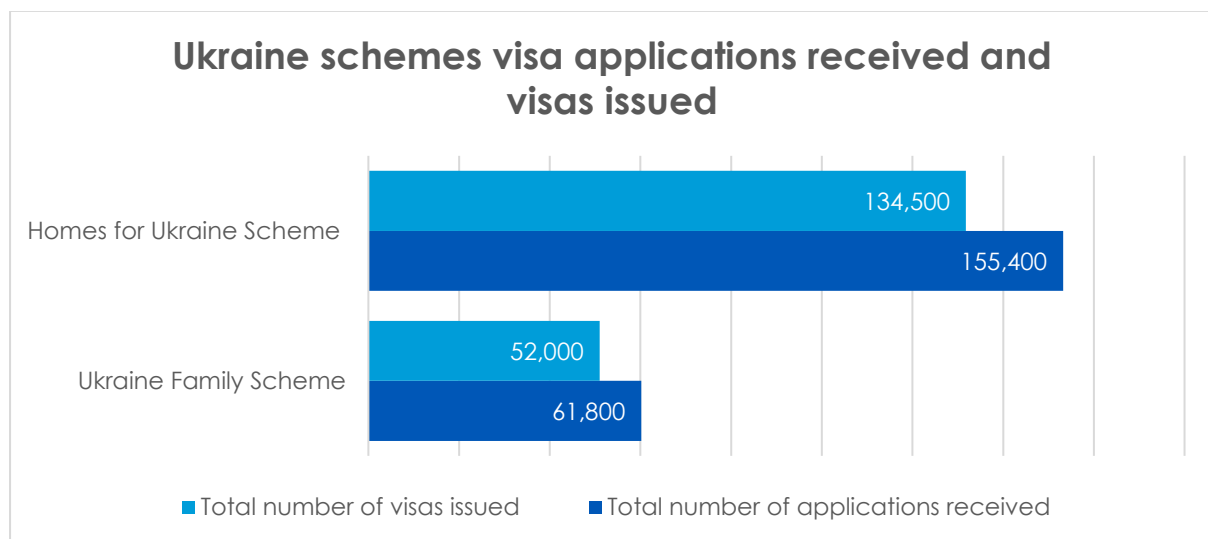


Figure 2: **Ukraine Schemes visa applications received and visas issued.** Source: Home Office Transparency data, Ukraine Family Scheme, Ukraine Sponsorship Scheme (Homes for Ukraine) and Ukraine Extension Scheme visa data. Published 22 September 2022

3.2 THE UKRAINE EXTENSION SCHEME (UES)

Opened on 3 May 2022, the Ukraine Extension Scheme was designed to ensure that individuals who previously had permission to stay in the UK at or around the time of the outbreak of the war, can continue their stay in the UK. This includes individuals who were previously in the UK on a Seasonal Worker visa, and who normally would not have been able to switch to another route in-country.

To this end, the scheme was open to Ukrainians and their immediate family members who had permission to be in the UK on 18 March 2022 - or, failing that, to those whose permission expired on or after 1 January 2022.¹⁸ From 15 September 2022, the latest Home Office Guidance has also introduced a temporary concession to allow those with permission to enter or stay on or between 18 March 2022 and 16 May 2023 to apply under the scheme.¹⁹

As of September 2022, the Home Office had received 15,700 applications under the UES, and awarded 10,900, indicating a success rate of around 69%. It is important to note that, while still high, this is considerably lower than the success rate of applications made from outside the UK. At the time of writing, as many as 27% of UES applications were still awaiting an outcome from the Home Office.

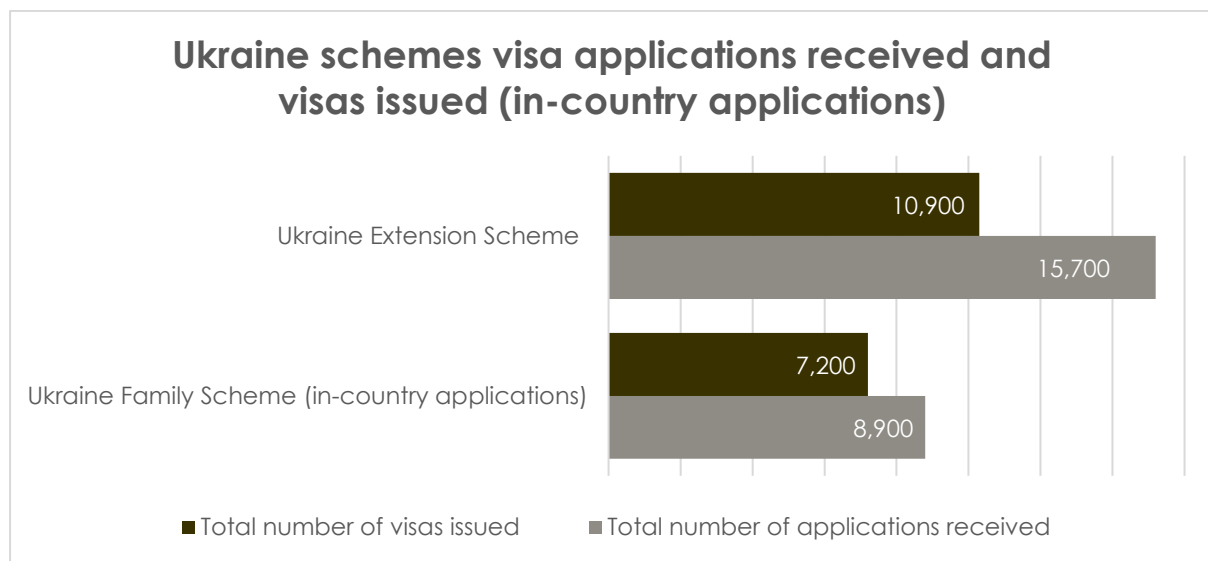


Figure 3: **Ukraine Scheme visa applications received and visas issued – in-country applications only.** Source: Home Office Transparency data, Ukraine Family Scheme and Ukraine Extension Scheme visa data. Published 22 September 2022

3.3 HOMES FOR UKRAINE (HFU A.K.A. THE UKRAINE SPONSORSHIP SCHEME)

Launched by the government on 18 March 2022, the Homes for Ukraine Scheme is perhaps the most unique of the three initiatives, in that it allows people who are living in the UK to “sponsor” Ukrainian nationals or family members to live in the UK with them.

Sponsors in England may connect with refugees privately, or record their interest online and wait to be “matched”.²⁰ In Wales and Scotland, the respective governments have been directly sponsoring individuals coming from Ukraine themselves (the “Devolved Government Sponsorship Schemes”) - although applications to these schemes stalled in early June and July 2022, respectively.²¹

To qualify for the HFU, sponsors must be able to provide their guest/s with accommodation for a period of at least 6 months. They must also pass a number of suitability requirements, including being subjected to criminal background checks, Disclosure and Barring Service (DBS) checks and, notably, evaluations of accommodation by local authority officials.

In contrast to family members hosting Ukrainians under the UFS, suitable sponsors under the HFU have the option to receive a monthly payment of £350 for up to 12 months, to assist with costs related to housing and supporting their Ukrainian guests. Crucially however, the payments do not increase if sponsors host more than one individual. Guests themselves are also eligible to receive an “interim payment” of £200 from the local authority, to help pay for subsistence costs.²²

It is important to mention that guests under the HFU were not intended to enter into a relationship of landlord and tenant with their respective hosts. In a letter to Clive Betts MP, Chair of the Levelling Up, Housing and Communities Committee, Lord Richard Harrington (then Minister for Refugees at DHLUC) noted the intention for the scheme not to create any formal tenancy rights:

*“No rent is charged under the Sponsorship Scheme, so there will be no creation of tenancy rights. Ukrainian nationals will either be excluded licensees, if sharing accommodation with the sponsor, or excluded occupier tenants in self-contained accommodation under the Protection for Eviction Act 1977. **Excluded occupiers can be evicted without a court order.** The sponsorship arrangement is not intended to confer exclusive possession to the Ukrainian guest or create the relationship of landlord and tenant between the parties.”²³*

The HFU is also far and away the most popular route for Ukrainians to arrive in the UK. According to the latest Home Office data, 155,400 applications were received under the HFU. Of these, 134,500 visas were issued, representing a success rate of 87%. The remaining 13% of HFU visa applications were either withdrawn, refused, or were awaiting their conclusion by the Home Office.

4 WHERE THE UKRAINE SCHEMES FALL SHORT

While the setup of the UK's three main schemes has been a welcome initial response to the humanitarian crisis in Ukraine, six months on, gaps are starting to appear in the design and practical operation of the schemes. In some ways, this is indicative of the reactive and piecemeal manner in which the schemes were introduced. In other ways however, the schemes also point to a worrying lack of long-term strategy for supporting refugees' integration into the UK.

A series of piecemeal responses. The initial response from the then Home Secretary Priti Patel was to introduce a route that allowed “British nationals and any person settled in the UK the ability to bring over their immediate Ukrainian family members”.²⁴ This is a route which has moulded into the Ukraine Family Scheme we know now, and which, after some public pressure, came to include EEA citizens with pre-settled status into the category of eligible family sponsors. A few weeks later, on 14 March, a new route was introduced by a different government body, the Department for Housing, Communities, and Levelling Up (DHLUC). Commonly known as the Homes for Ukraine Scheme, this was in effect the UK's visa-based response to the vast outpouring of

support for refugees from members of the public who made it clear that they wished to welcome all those fleeing the war, not just the few who qualified under the Family Scheme. Finally, after further public pressure, on 3 May the Ukraine Extension Scheme was launched, extending the same rights to live, work, and study inherent in the first two schemes, to Ukrainians who were already in the UK on student, seasonal work, or other temporary visas.²⁵

Simply put, it took two months, two government departments, and countless MPs', charities', and journalists' interventions for the UK to piece together a multi-scheme response, similar to the temporary protections instituted in the EU one week from the start of the war. Though more inclusive with every iteration, the gaps between this patchwork of responses are hard to ignore.

The schemes exclude people who ordinarily reside in Ukraine, but lack Ukrainian citizenship. The UK schemes are open only to Ukrainian nationals, and to third country nationals who are family members of Ukrainian nationals applying under the schemes. By definition, this risks excluding up to 450,000 individuals who have been living in Ukraine, without holding Ukrainian citizenship.²⁶ This exclusion has occurred as a direct result of the Home Office's insistence on a visa-based response to the humanitarian crisis in Ukraine, where refugees have to meet eligibility criteria and specific documentary requirements *before* they can enter the UK.

In-country applications have a lower success rate. Although the initial figures indicate high visa application success rates, it is clear that applications made under the Ukraine Extension Scheme are not being expedited with the same vigour, and discretion, as those made under the other respective schemes. Compared to the application success rate for Homes for Ukraine and the Ukraine Family Schemes, which stand at 87% and 84% respectively, only 69% of visa applications for the Extension Scheme received a positive decision.

The precise reason for the discrepancy is hard to pinpoint. It may include the complexity of assessing the eligibility of applicants who “switch” into the Extension Scheme category from other visas, or it may simply be a question of variation in performance between different casework teams. A more worrying possibility, however, is that as the main scheme explicitly designed for Ukrainians who were already in the UK, the UES is also likely to receive more applications from Ukrainians who lack a valid immigration status, and who hope to use the UES to regularise their stay in the UK – indeed, two of our service users fit into this category.²⁷

The status of undocumented Ukrainians remains precarious. Despite the many concessions baked into the schemes, such as the relative speed with which decisions are made and the high level of discretion which caseworkers are encouraged to exercise, undocumented Ukrainians who entered clandestinely or who overstayed their visas continue to lack accessible ways of regularising their status.

The legally binding *Rules* which govern applications under the Ukraine schemes explicitly require in-country applicants to have had a valid immigration status in the UK by 01 January 2022. Although the *Guidance* for Home Office caseworkers does

allow for some flexibility, the Guidance is a non-binding document, which leaves undocumented Ukrainians uncertain about their applications' prospects of success.²⁸ Alternatively, the options open to undocumented Ukrainians are as difficult to navigate as those open to all undocumented migrants - for instance, apply via the asylum system, and face waiting times of a year or more, or try to access the Private Life route, where applicants are required to demonstrate as many as 20 years of continuous residence (or very significant obstacles to their integration in a country other than the UK), and face a further 10 year wait before being eligible to apply for settlement. Worryingly, as late as in June 2022, then Prime Minister Boris Johnson suggested that Ukrainians who might enter the UK illicitly in their desperation to escape conflict in their home country are at risk of removal to Rwanda.²⁹

Payments are only awarded to hosts and councils supporting refugees under the Homes for Ukraine Scheme. In the context of the UK wishing to support those fleeing the crisis in Ukraine, this makes very little sense. Regardless of the relevant visa type, all Ukrainian refugees need support to access secure accommodation, employment, education, and health services. The fact that different visa schemes are administered by different government departments, with different levels of funding available, should not impact the financial support given to Ukrainians, hosts, and local authorities in practice. There is a real need to expand these payments to Ukrainians who have made successful applications under the UES, and UFS. As we show in the next section, they are even more vulnerable to eviction than those on the HFU.

Payments can be delayed and, in any case, fail to keep up with living costs. Although the initial "thank you" and "interim" payments to hosts and guests were welcome, their utility is dependent on their timely arrival. The Executive Director of one charity involved in the matching and re-matching of Ukrainians with sponsors in the UK noted that some individuals are waiting up to 8-12 weeks to receive their first payments. This puts pressure on the relationship between hosts and refugees, especially considering rising living costs. Indeed, if in March consumer price inflation was 6.2%, by July this figure had already grown to 8.8%.³⁰ In a similar vein, the energy price cap rose significantly, from £1,277/year for a typical household in March, to £1,971/year in April 2022, and £2,500/year in September 2022 – which could have been as high as £3,549 without government intervention.³¹ In addition, quite counterintuitively, the level of payments to hosts do not increase with the number of Ukrainian refugees hosted, meaning that those who sponsor larger families are in an even worse predicament financially.

The schemes lack a long-term plan. The insecurity which characterises Ukrainian refugees' current housing arrangement is compounded by the fact that, to date, the government has offered little clarity as to what rights they and their family members will have, once the three-year permission to stay expires. There is currently no clear guidance on longer term options, or how Ukrainian refugees' current three-year permissions to stay can serve towards a viable pathway to settlement. According to frontline caseworkers, this has resulted in a challenging landscape for Ukrainians wishing to establish some semblance of a normal life in the UK.

5 ISSUES FACING UKRAINIAN REFUGEES IN THE UK

On the 26th of August, we launched a survey for the Ukrainian community in the UK. We wanted to understand how refugees had found their first few months, and identify any risks they might be experiencing in securing their immigration status, but also in their living arrangements or their ability to find employment in the UK. The survey was available in three languages, and it was distributed over the course of three weeks via community groups and Ukrainian social media channels.

In this chapter we look at the main findings. It is important to note from the outset that the survey suffers from a few limitations. Due to our sampling method via online communities, the survey is not statistically representative of the whole population of Ukrainian refugees in the UK, and care should be taken to not generalise findings. When we refer to Ukrainians, in other words, we are referring to those who responded to our survey, not to the whole population of Ukrainian refugees living in the UK. Similarly, there is a possibility that respondents self-selected, and that those who took the time to fill out our survey were more digitally savvy, more connected to community groups, or keener to share their experience in the UK.

Having noted this, we believe that the absence of data and the urgency of the situation make this survey an important first step in understanding the issues facing the Ukrainian community in the UK. It should not be the last. We urge readers to reflect on the findings below, conduct further research, and consult wherever possible with stakeholders within, and supporting, the Ukrainian community.

A total of 191 Ukrainians responded to our survey. This included Ukrainian nationals in the vast majority of cases, but also partners who were eligible to apply under the three Government schemes. All respondents had a valid immigration status in the UK, with 72% on the Homes for Ukraine Scheme, 16% on the Family Scheme, 3% on the Ukraine Extension scheme, and the rest in possession of another form of leave to remain.

Respondents were located across the UK. The most common locations were London 30%, Scotland 8%, Leeds 6% and Manchester 3%, while just under half of respondents 47% reported living in another part of the UK. Worryingly, of those respondents who were located in other parts of the UK, 27% were unable to identify their local council. In London, respondents who identified their local authority were dispersed across the capital, with the most popular boroughs being Croydon (14%), Barnet (9%), Wandsworth (9%) and Haringey (7%).

Most respondents were highly educated women. Reflecting the fact that men of fighting age had been banned from leaving Ukraine, most respondents to our survey identified as female 85%, with just 14% male and less than 1% non-binary. Most of them had one (72%) or even two (16%) university degrees, with just 11% reporting interrupting their studies after completing secondary education. This is likely an outcome of the ways in which the survey was distributed, via online social media channels. Equally however, it may also reflect the fact that, given the format of the

UK's visa applications, which require a moderately high level of English and digital competence, the people who were more likely to take advantage of the UK's Ukraine Schemes, were also those who were most able to access them.

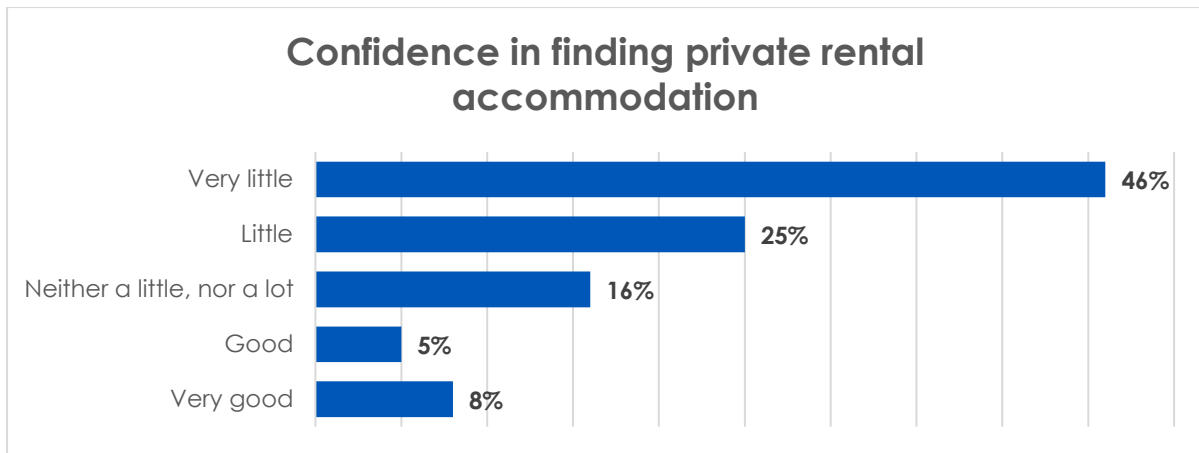
Some Ukrainians were still waiting for Biometric Residence Permits (BRPs). Despite the Government's pledge to issue BRPs to selected Post Offices within 10 working days, a minority of respondents (7%) were still waiting for their BRPs.³² Among them, the average waiting time was 3.3 weeks, but this was considerably longer for applicants under the UFS and UES, who reported waiting for an average of 9 and, respectively, 8 weeks. Without effective means to expedite the delivery of BRPs, they face the additional administrative hurdle of chasing BRPs.

Beyond the issue of delays, the survey revealed other worrying socioeconomic risks.

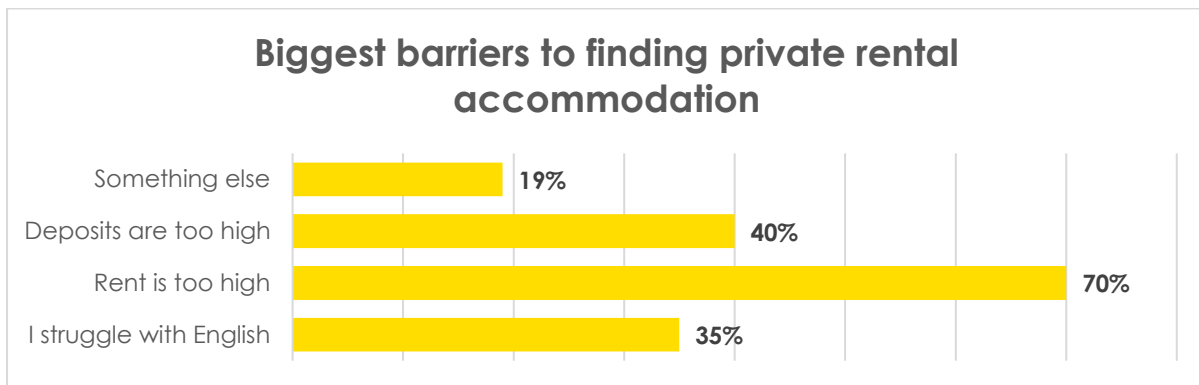
As many as 1 in 5 Ukrainians were living in overcrowded accommodation. A whole 19% of survey respondents reported living in overcrowded accommodation and, worryingly, of this population 23% reported living in overcrowded conditions with their children. This raises important issues around privacy and family development, and around children's ability to secure the space they need to study and adjust to the novelty of living in the UK. It also indicates that, certainly for a section of the Ukrainian population hoping to rebuild their lives in the UK, there is a need to provide better quality housing and accommodation options, beyond the initial offers from sponsors. This was particularly prominent among Ukrainians who were living with family members. If, under the HFU scheme, sponsors are required to show local authorities that they have adequate space available, no such requirements exist under the UFS. Indeed, almost half 47% of respondents who had status under the UFS reported living in overcrowded accommodation, compared to 11% of those on the HFU. Overall, this suggests that respondents living with family were more than four times as likely to struggle with overcrowding.

One in 10 Ukrainians had been threatened with eviction at some point of their stay in the UK. This included 4% of respondents who experienced the threat in the past, but also 6% who were being threatened by their current hosts. Once again, the risk is higher for refugees staying with family. As many as 13% of Ukrainians who were living with family members under the UFS were at imminent risk of eviction - more than double the rate of those who had received this threat by sponsors under the HFU (5%). Most worryingly, almost a third (32%) of the respondents who reported receiving eviction threats had failed to notify their local council. This points to an urgent need for councils to step up their outreach efforts, and to leave refugees in no doubt about their duty of care.

Barriers to the private rental market amplify the risk of homelessness. When asked how confident they were in their ability to find privately rented accommodation within a month, if the need arose, more than two thirds (71%) of respondents reported having very little or little confidence.



The primary barrier was the high value of rents, mentioned by 70% of respondents, followed by unaffordable deposits, mentioned by 40% of Ukrainians, barriers in their ability to speak English, and other factors.



Several respondents identified other subtle barriers that were hindering their access to the private rental sector, including the absence of an employment history in the UK, and difficulties in passing credit checks, which in turn prompted agencies to require guarantors. The excerpts below reflect some Ukrainians' experiences in attempting to access the private rental sector:

If you have insufficient or unstable income, all companies require a guarantor, who is impossible to find.

We do not have a banking history in England, so landlords require a guarantor, but we do not know any people who could act as our guarantors.

There is no affordable housing, landlords do not want to rent apartments and houses to Ukrainians. Sponsors also do not want someone to live with them for a long time. Need some benefits and guarantees from the government for landlords. For example, I can rent an apartment, but when they hear that I am from Ukraine, they refuse to rent it to me.

Even in circumstances where individual respondents were able to meet one or more pre-requisites, landlords were reluctant to rent out their properties to tenants on low

incomes. This was a particular barrier for single mothers, who were both unable to find suitable work to fit around their childcare arrangements, and unable to secure childcare arrangements to allow them to transition into full-time employment:

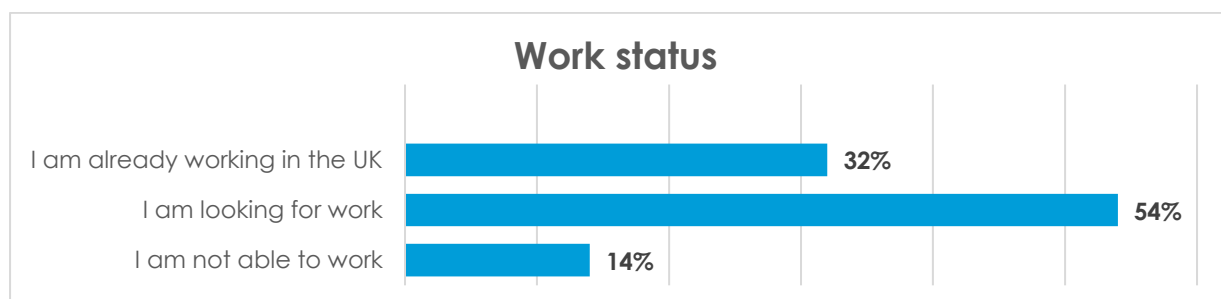
I'm a single mom, my child is getting sick all the time, I have difficulties with finding a job and I don't have money to pay 6 months upfront to rent an apartment.

I am unable to attend classes or work until my child starts attending kindergarten. A child cannot currently be enrolled in kindergarten because we do not have a permanent address and must therefore live in a hotel. Furthermore, without a permanent address, we are unable to register with a GP and can only receive emergency services. Most importantly, if the government had acted as a guarantor when renting an apartment, we would have been able to rent accommodation, get a permanent address, enrol a child in kindergarten, work, have a registered GP, and start living independently.

More than half (58%) of survey respondents reported having no savings. Even those who did have some savings reported being able to cover no more than 13 weeks of living costs, on average. When deposits can be as high as 6 to 12 months' rent, and when letting agents require upfront payments, there is a real risk that Ukrainian refugees excluded from the private rental sector face the prospect of homelessness, or a precarious dependency on sponsors and family members.³³ One of our respondents highlighted this as a particular problem:

There aren't enough landlords or rental agencies to accommodate Ukrainian citizens who don't have stable employment or a credit history. Only a few landlords will rent to us on the condition that we pay for 6 or even 12 months of rent in advance. It is also difficult to find family and pet-friendly accommodations.

Less than a third of Ukrainians had found jobs in the UK. Asked about their work status in the UK, just (32%) of survey respondents reported already working in the UK, while more than half (54%) were still looking for work, and 14% were unable to work at all. Worryingly, among those who were actively looking for employment, almost half (44%) had little or very little confidence in their ability to find work within a month.



The barriers they mentioned were diverse. On the one hand, respondents reflected on the lack of suitable part-time employment opportunities to balance childcare needs, and on the unaffordability of childcare support for those wishing to take up full time employment:

It is difficult to find work that fits around a child's school schedule.

If you have a child, you will need a part-time job, which is difficult to find while living in the countryside.

On the other hand, respondents cited a lack of recognition for Ukrainian educational qualifications and certificates:

Ukrainian diplomas aren't recognised in Great Britain. Ukrainian teachers of English aren't employed by primary schools where they are urgently needed at the moment. Plenty of Ukrainian kids need help in learning English and it takes a lot of time to study the language in English instead of comfortable lessons with a Ukrainian-speaking teacher.

International certificates that I received in Ukraine are not valid here. There are no good English classes in my city. Local council representatives do not provide substantive answers to my questions, and it appears that their only responsibility is to make sure that everyone is alive (refugees and sponsors).

Finally, a couple of our participants also reflected on barriers related to local transport infrastructures, that prevented them from accessing employment opportunities based in urban centres:

The bus does not run in my area, and I do not own a car. Despite having a driver's licence, I do not have enough money to purchase a car for commuting.

I live in a small village and only have a bicycle for transportation. My applications have been rejected by employers in my area.

While finding employment in a new country is likely to take time, given the risk of homelessness described by many and the low levels of savings available, supporting Ukrainian refugees with labour market integration should be another government priority. Despite being highly educated and interested in skilled positions, transport, childcare, qualifications, and in particular barriers of English are likely to stand in the way. Indeed, the latest ONS statistics released relating to Ukrainians' access to the UK labour market demonstrate that "most (63%) employed adults" reported not working in the same sector as they had previously worked in Ukraine.³⁴ Long-term support with employability is key to ensuring that Ukrainian refugees retain their skillset, along with the income security derived from employment.

Just over one third of survey respondents (38%) were able to speak English at conversational levels or above. While it is encouraging to discover that most of those who struggled with English were either taking classes (60%), or interested in doing so (38%), our respondents indicated clearly that further investment is needed to build language and literacy skills amongst the Ukrainian community. This was particularly acute in respect of Ukrainian children taking up education in the UK:

Ukrainian kids in schools need help of Ukrainian speaking teachers of English, especially the younger ones. This will help them to learn faster and in more comfortable ways. They fled from war, their relatives are still in Ukraine. The kids are under stress and schools add even more stress because children don't understand English. Furthermore, if at least some Ukrainian teachers are employed in British schools, they will be very grateful for this.

Ukrainians are accessing the support available. When survey data indicates that many Ukrainians are struggling with overcrowding, threats of eviction, low levels of savings and unemployment, it is encouraging to learn that they are accessing the support made available by government, and by communities. The majority of survey respondents (84%) were aware that status under the Ukraine Schemes entitled them to apply for benefits in the UK, and as many as 76% had also made an application for Universal Credit. While further awareness raising efforts could push that figure higher, initial findings are a welcome silver lining.

Where significantly more effort is needed, is at the level of local community support. Respondents who had accessed support from their communities were pleased with the assistance provided, which included English lessons, food and clothing items, and digital devices for children:

The Ukrainian community and charitable organizations have helped a lot with advice and food with clothing.

Volunteers have helped with different issues and lots of advice. Local Council sometimes helps with the documents and up-to-date information. Sponsors provided a great support in everything, financially and emotionally. Ukrainian Community provides consultations, SIM cards, clothes, food, regular meetings with other Ukrainians.

However, improvements are required to increase the impact and outreach of local sources of support. A stark 40% of respondents had not reached out to anyone. Among those who did seek further support, most did so from their local council (32%), followed by charities (27%), the Ukrainian community (27%), or other groups. Only a very small minority of 4% had contacted an MP.

6 STRUCTURAL ISSUES

Our survey data points to the real risk that, without government intervention, Ukrainians will face a crisis of homelessness, as sponsors and families end their hosting arrangements, and refugees' savings are too small to enable them to access the private rental market. If 13% of all refugees on the Family Scheme, and 5% of all those on the Homes for Ukraine Scheme will be asked to make urgent alternative arrangements, as was the case for our survey respondents, this could amount to as many as 13,220 Ukrainians facing homelessness across the UK. The sheer scale of this crisis is staggering, but not unexpected. In this chapter, we argue that the risks encountered by the Ukrainian community are part of larger structural issues which have affected previous refugees, and a generation of young and low-income Britons. Namely, this refers to an inability of local authorities to meet the demand for homelessness support, and to a chronically inaccessible private rental market.

6.1 LOCAL AUTHORITIES STRUGGLE TO ADDRESS HOMELESSNESS

Under the Housing Act 1996, local authorities have a statutory duty to assist individuals who are in, or facing a risk of, homelessness.³⁵ Immigration status is important in this context – previous case law has indicated that local authorities are not compelled to accept applications for homelessness relief from individuals who may be present in the UK unlawfully.³⁶ However, with the exception of undocumented Ukrainians, refugees with status under one of the three schemes fall squarely within the councils' duty to “prevent” or “relieve” homelessness.

In May 2022, the Government also introduced a statutory instrument that would ease the obligations on local authorities in England to evaluate the suitability of private accommodation – notably, only when dealing with homeless applications made by people who, like Ukrainian, Afghan, and Syrian refugees, arrived in the UK within the past two years.³⁷ If, under previous regulations, councils could not house homeless families with children or pregnant women in B&B style accommodation, and certainly not for longer than six weeks, the May 2022 changes remove that cap.³⁸ Councils also have greater flexibility in making out of area accommodation offers. If, previously, councils were required to accommodate homeless households in their own area, now they have the option to accommodate some individuals in a completely different part of the country. The relevant code of guidance specifically stipulates that “*authorities are encouraged to establish arrangements with partners that go beyond referral procedures, aiming to maximize the impact of shared efforts on positive outcomes for service users who may have multiple needs*”.³⁹

Homelessness charities like Shelter have described the May 2022 amendment to homelessness regulations as an appalling two-tier system that singles out refugees, and suggests that it is acceptable for children fleeing Kyiv or Kabul to be placed in temporary accommodation for months or even years, when children born in the UK would be owed a higher standard of care. We are worried that the problem might go even deeper. While there is no doubt about the shortcomings of placing refugee families in B&B accommodation, or in parts of the country with which they have no connection, insights from frontline organisations suggest that councils struggle to

address homelessness, even after the standard of care has been substantially lowered.

One organisation leading on refugee settlement informed us that there are significant variations in councils' willingness, and ability, to support rematching, especially when this involves a rematch with a host located in a different local authority. Our own service provision team have encountered worrying examples of Ukrainian families being told that local authorities cannot assist due to a lack of emergency/temporary accommodation – without being offered the possibility of a rematch at all. In some circumstances, local authorities were completely unreachable, with contact details of relevant housing officers obscured from public view. In others, even after caseworkers managed to find the relevant council staff, they were told that due to an absence of available accommodation, the council was simply in no position to help, without any mention of their ability to make a referral to accommodation in other parts of the country. The case studies below capture the desperate situations encountered by Ukrainian families who fall through the cracks of local authorities' homelessness safety net.

CASE STUDY #1 – KATRYNA

Katryna and her son arrived in the UK under the Homes for Ukraine scheme. In mid-August, she contacted our service provision team, notifying us that she was due to be evicted on 7 September as the property was getting too crowded. After applying for housing assistance with the help of our caseworker, Katryna was called back the following day and was told by the council that no emergency or temporary accommodation was available. Time and again over the course of several weeks, we attempted to contact the council to highlight the precarity that she was facing - to no avail.*

It was only on 5 September, two days before Katryna and her son were due to be evicted, that our colleague Ksenija Peniaz, her caseworker, was able to speak to an adviser about Katryna's circumstances. It was only after a last-minute joint intervention from the child's school that they were finally re-housed, on 8 September, pending re-matching with another sponsor host in the future. Although the family narrowly avoided rough sleeping, Katryna endured great emotional distress. This was exacerbated by the ambiguity, lack of communication, and lack of clarity from the local council's housing team, which forced her and Ksenija into chasing the local authority for assistance, when the case should have been dealt with expeditiously from the beginning. Unfortunately, many other clients are facing similar circumstances. They deserve better.

**all names are changed to protect our beneficiaries' anonymity.*

CASE STUDY #2 – MARINA

Marina* came to the UK in May 2022 under the Ukraine Family Scheme, accompanied by her 12- and 13-year-old children. Together, they moved in with some relatives in an East London borough. Marina soon found work as a cleaner, and enrolled her children into the local school. In July however, her life was turned upside down.

Marina was told by her relatives that she needed to vacate the property urgently, as they were planning on leaving the country and were not comfortable handing her a key. As a result, and because the UFS does not operate a similar rematching scheme as the HFU does in these circumstances, Marina and her children were facing the crippling prospect of homelessness.

Our colleague Andrei Savitski, Marina's caseworker, made a homelessness application for her, and contacted the homelessness advice team at the local council to report the situation. This is when the inability of the council to cope with homelessness demand became apparent. No response was received, even when Andrei attempted to follow up and explain the urgency day after day. Because of the immediate precarity the family were facing, our caseworker resorted to contacting the safeguarding team at the children's school, and reported the situation to social services and the Multi-Agency Safeguarding Hub ('MASH'). It was only after these teams used their own powers to escalate, that the council was able to assist, and finally offer Marina and her children some temporary accommodation to prevent them from becoming rough sleepers.

If Marina's emergency was temporarily averted, we believe that many Ukrainian refugees fall through the cracks. Before she contacted our service provision team, Marina was unaware of her rights to homelessness relief, or indeed of the steps she would be required to uphold them. She was not aware of any publicly available information in her native languages either, and would likely have felt pressured to leave her family's property, without acquiring any written confirmation of eviction. The lack of interpretation services available within the local council also made interactions difficult, giving her no option but to rely upon the help of our bilingual caseworker at every stage.

While we were relieved to see Marina and her children find temporary accommodation, and were thankful for the role of the safeguarding team at the children's school in expediting her application for homelessness relief, we believe that much more needs to be done by the local authority in these circumstances. To prevent other families from facing the prospect of rough sleeping, councils need to reach out to vulnerable Ukrainians, consolidate their response to applications for homelessness relief, and ultimately support refugees' transition to the private rental sector, where they can lead self-sufficient lives, independently of the interventions of hosts and other groups.

*all names are changed to protect our beneficiaries' anonymity.

Local authorities' inability to keep up with rising homelessness demand goes beyond the first-hand experience of our caseworkers. The latest statistics on homelessness management for Ukrainian nationals in England suggest that around 1,565 Ukrainian households were owed a prevention or relief duty in the period covering 24 February to 26 August of this year.⁴⁰ Just under half of these households (49.5%) arrived under the Ukraine Family Scheme, while more than a third (43%) arrived under the Homes for Ukraine Scheme. Alarming, nearly three quarters of all households (69%) include dependent children, pointing to a real crisis of child homelessness. These statistics reflect our frontline data – namely, even though the numbers of arrivals under the HFU scheme are higher than the UFS, people arriving under the UFS are more at risk of homelessness than those living with HFU sponsors.

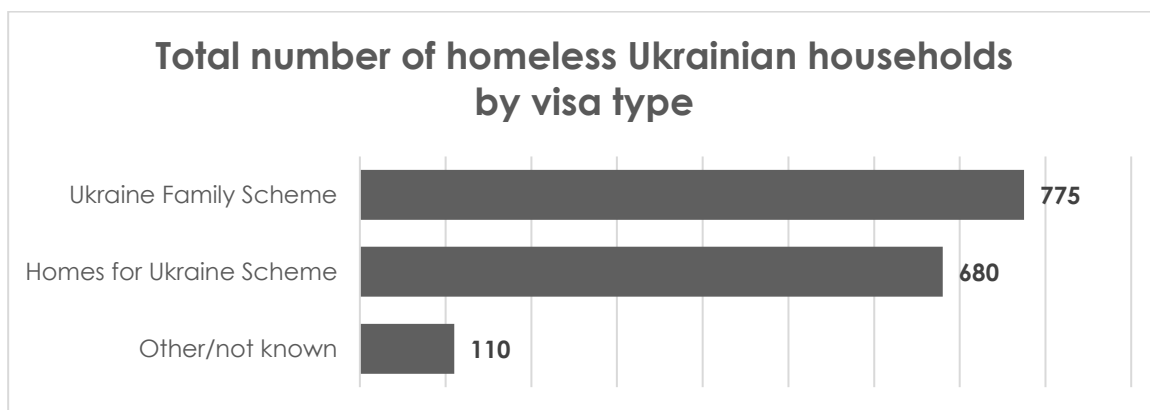


Figure 4: **Ukraine homelessness statistics – by visa type.** Source: Department for Levelling Up, Housing and Communities, Homelessness management information – Ukrainian nationals: England. Published 8 September 2022

It is important to observe that whilst homelessness was prevented or relieved in 35% of cases, either through mediation, rematch, or other means, only a small minority of total households (16%) had been offered settled accommodation, while less than half (40%) were offered temporary accommodation.

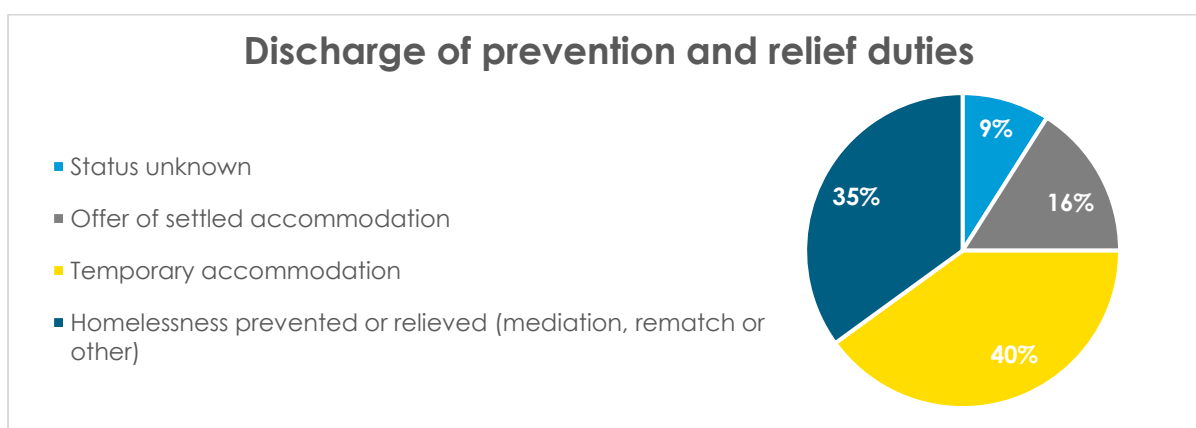


Figure 5: **Ukraine homelessness statistics – by outcome.** Source: Department for Levelling Up, Housing and Communities, Homelessness management information – Ukrainian nationals: England. Published 8 September 2022

In London, a pattern is emerging. Though the data varies across boroughs, some authorities appear to be finding it difficult to offer any settled accommodation at all. The table below is a snapshot of homeless application outcomes, represented as a proportion of all homeless applications recorded by each borough. We focused on only those boroughs which recorded 5 or more homeless households. Readers should note that for some councils, marked *, the sum of outcomes recorded exceeds the total number of homeless households. It is unclear if this is to do with errors in data entry, or whether it reflects the fact that households were offered several options, at different points in time. Similarly, for most other councils there are fewer outcomes recorded than homeless households. It is unclear if no data was collected and submitted to DHLUC – or more worryingly, whether those households were left in limbo, similar to the two case studies recorded by our caseworkers.

Name and number of homeless households (in brackets)	% of homelessness prevented or relieved	% of temporary accommodation snapshot	% offer of settled accommodation
Barnet (35)*	37%	34%	43%
Brent (21)	0%	5%	38%
Greenwich (28)*	32%	64%	14%
Lewisham (7)	0%	29%	14%
Sutton (22)*	118%	41%	14%
Enfield (15)	13%	53%	7%
Tower Hamlets (20)	0%	30%	5%
Hounslow (58)*	64%	36%	5%
Haringey (35)	3%	37%	3%
Newham (29)	0%	21%	3%
Bromley (31)	26%	58%	0%
Hackney (10)	20%	40%	0%
Islington (18)	6%	78%	0%
Kensington & Chelsea (33)	3%	48%	0%
Kingston upon Thames (10)	0%	40%	0%
Richmond upon Thames (58)	10%	40%	0%
Southwark (6)	0%	67%	0%
Wandsworth (37)	8%	49%	0%
Westminster (28)	7%	75%	0%
Lambeth (9)	0%	67%	0%
Merton (6)	17%	50%	0%
Redbridge (9)	33%	56%	0%

Figure 6: **Ukraine homelessness statistics.** Source: Department for Levelling Up, Housing and Communities, Homelessness management information – Ukrainian nationals: England. Published 8 September 2022 ⁴¹

The uncertainty concerning data transparency is another facet of local authorities' struggle to address homelessness. This goes beyond the London snapshot. Overall across the UK, for 9% of those who were owed a prevention or relief duty it is not clear from the available Homeless Management statistics what the outcome has been, and whether they continue to be homeless while local councils search for options, or whether homelessness was in fact prevented, but data was simply not collected or entered (see Fig 5). Similarly, it is concerning that the collection of Homelessness Management information for Ukrainian refugees is currently non-compulsory. In the latest round of statistics, as many as 90 local authorities (30% of local authorities) failed to submit any data at all. Crucially, without this information we are currently unable to gauge the precise scale of the crisis that Ukrainian refugees are facing in the UK – or indeed, to channel resources and outreach to the communities that are most at risk.

6.2 AN INACCESSIBLE PRIVATE RENTAL SECTOR

The risk of homelessness experienced by Ukrainian refugees is amplified by the fact that, for many years, accessing secure accommodation in the UK's private rental market has become increasingly difficult for low-income households. A shrinking housing stock which has pushed rents to record-high levels, landlords' requests for large deposits, and a bias against benefit claimants have all contributed to driving the private rental market out of reach. In this section we look at these barriers, and how they diminish access to the market for the most vulnerable.

The rental stock is in crisis. The number of rental properties currently available on the market has dramatically decreased in recent years. A survey of 443 UK sales and lettings agents released in June 2022 by Propertymark, the leading professional body for estate and letting agents, found that, compared to three years prior, the number of properties available to rent had been reduced by an alarming 49%. If in 2019 a lettings branch had an average of 30 properties on offer, by 2022 that number had almost halved to 15.⁴² Underpinning this general reduction in property stock, there are significant regional variations. In January 2022, there were just 4 properties available by branch in London – barely over a quarter of the properties available across the UK on average.⁴³

The causes of this radical reduction in properties available per branch are diverse. The Propertymark report attributes it in part to the increased number of landlords leaving the private rental sector, with a decreased number of new landlords entering the market compounding the issue. Nathan Emerson, the CEO of Propertymark, points to a rise in regulation and energy efficiency targets affecting landlords. What is clear to date, is that with a dwindling supply of properties available to rent, more people live precariously, depending upon the benevolence of host and family, or living in overcrowded accommodation.

Rents are rising faster than incomes. The disparity between demand and supply for private rents has led to an incredibly competitive rental market. According to the ONS, in the 12 months to July 2022, rental prices paid by tenants in the UK have risen by 3.2%, representing the largest yearly growth since price index tracking began in

January 2016, and as much as a 14.3% increase since January 2015.⁴⁴ In some regions of the UK, including the East Midlands, the North West and the South West, prices have risen by as much as 4%. The data concerning London rent rises varies. The ONS report places the figure at 2.1%, the lowest increase in rent across the country, while according to SpareRoom, rents in London have increased by as much as 15% in the last year.⁴⁵

Despite the variations in the data, it is clear that rent rises are eating into, if not completely eroding wage increases, and that they are certainly dwarfing any increases in benefits. Between June 2021 and June 2022, average weekly earnings for total pay in the UK had risen by approximately 6% - enough to cover London rent increases according to the ONS, but not even half of what was needed to cover the figures reported by SpareRoom.⁴⁶ Most worryingly, between October 2021 and March 2022, Universal Credit payments for single claimants under the age of 25 stood at £257.33, increased from £256.05, the rate applied during 2020/2021 (a 0.5% increase).⁴⁷ This same figure currently stands at £265.31, representing a further increase of only 3.1%.⁴⁸ Simply put, rental property is becoming less affordable by the year, affecting not only Ukrainian refugees, but also a generation of young Britons.

A long-term struggle for benefit seekers. Blanket bans on renting to people who avail themselves of benefits such as Universal Credit or Housing Benefit are generally considered unlawful. This position stems from a landmark case in 2020, which ruled that a letting agent had been in breach of the Equality Act 2010 by refusing to rent to a disabled single parent on the basis that they were receiving Housing Benefit, and that this action constituted indirect discrimination.⁴⁹ The ruling was widely welcomed by campaigners for social mobility who, at the time, heralded it as a game changer, driving out discriminatory practices that were preventing access to the private rental sector.⁵⁰ And yet, in the murkier world of practice, the bias against benefit seekers continues.

According to statistics from the English Private Landlord Survey 2021, 37% of landlords with five or more properties are unwilling to let to people who are in receipt of Housing Benefit or Universal Credit. For landlords with fewer properties, the figures are even starker. Almost half (45%) of them reported being unwilling to rent to benefit claimants.⁵¹ Furthermore, benefit claimants are often subjected to extra referencing requirements and affordability checks, or are asked to provide a guarantor – similar to our survey respondents. Even when they do enter the rental market, many may find it hard to switch properties, as they struggle to come up with the funds for a second deposit before their first deposit is returned.⁵²

Recent research with Ukrainian refugees found that many of them experienced the same barriers encountered by benefit seekers in the past. Opora, a UK based charity focused on helping Ukrainians to rebuild their lives in the UK, has recorded anecdotal incidents of Ukrainians being subjected to extensive credit and referencing checks, including in relation to previous work and tax history in the UK, despite only having been in the country for a few months; being subjected to high salary requirements;

having to pay a portion of rent upfront, or being asked to put forward costly deposits; and having to provide a suitable guarantor to secure a tenancy.⁵³

A vacuum of legislation entrenches the exclusion of low-income households from the private rental sector. The housing white paper published in June 2020 noted that the government was planning on bringing forth legislation that makes blanket bans on renting to people in receipt of benefits illegal.⁵⁴ As far back as 2019, the housing minister Heather Wheeler noted that “everyone should have the same opportunity when looking for a home, regardless of whether they are in receipt of benefits”.⁵⁵ At the time of writing however, this new legislation is still awaited. If the UK’s private rental market is going to be accessible to Ukrainian refugees, further work is needed to not only provide short-term idiosyncratic solutions for this particular community, but also to level the playing field for low-income tenants looking for sustainable housing options in the private sector more generally.

7 CONCLUSIONS AND RECOMMENDATIONS

Reflecting across our policy analysis, survey data, and government statistics, this report points to three broad types of challenges facing Ukrainian refugees and policymakers at DHLUC and the Home Office, and at local authority level: *design challenges* related to the Ukraine schemes, namely their eligibility conditions and the different levels of support they offer to refugees and to councils; *implementation challenges*, related to the ways in which applications are processed, and resources are allocated between government departments; and what we call *integration challenges*, related to housing security, employment, and the ways in which Ukrainian refugees are supported to build sustainable livelihoods in the UK, independently of the goodwill of sponsors.

This chapter proposes a series of recommendations for how to tackle these issues. Without a doubt, this is one step in what is likely to be a long journey of taking stock of the UK’s response to the war in Ukraine. The uncertainties of the war, which may endure for months or years still, and displace thousands more Ukrainians, are likely to call for many more re-examinations of the schemes. Similarly, we recognise the fact that policymakers in the UK must respond to the acute issue of a humanitarian crisis, while also facing chronic, structural issues of housing shortages, rising cost of living, and high government debt. There are few quick fixes to this scenario, and the ability to respond promptly to short-term emergencies, without losing sight of the long-term risks is key. This chapter thus offers several solutions, with a view to support policymakers with a direct role in handling the Ukraine crisis to develop an adequate response.

7.1 IMPROVING THE DESIGN OF THE UKRAINE SCHEMES

Provide undocumented Ukrainians with a pathway to regularisation. While the government has allocated significant resources to instituting the Ukraine Schemes, and to ensuring that applications are processed quickly and flexibly from refugees fleeing Ukraine, undocumented Ukrainians who were already living in the UK continue to lack any accessible means of regularising their status. We argue that this is misguided on two counts. Firstly, without a valid immigration status granting them the

right to work, live, and access funds in the UK, undocumented Ukrainians are at high risk of labour exploitation and impoverishment. This, in turn, is likely to cause a bigger drain on public resources later on, as local authorities may have to respond to cases of homelessness and labour exploitation – or more worryingly, as Ukrainians are drawn into the immigration enforcement system. Furthermore, anecdotal evidence from third sector advisers already suggests that some Home Office caseworkers have approved in-country visa applications under the Ukraine Extension Scheme, even where the applicants did not meet the relevant eligibility requirements (including the need to have held a valid immigration status at a certain date). To protect Ukrainians from exploitation, we urge the Home Office to make the in-country applications to the UES and UFS more inclusive of overstayers and clandestine entrants, and recognise the fact that, regardless of immigration status, for as long as Russia continues its invasion, Ukrainians are still refugees in need of protection.

Harmonise the financial support offered across the schemes. The financial support offered to refugees, sponsors, and local authorities under the HFU has played a key role in the integration of Ukrainians. We believe it should be extended to the other schemes. As our survey data has shown, the needs of Ukrainians with UFS status are not only similar, but even more acute than those of Ukrainians sponsored under the HFU. They are at higher risk of overcrowding and eviction, and have the same requirements for support to learn English, access jobs, and claim public funds in the UK. Harmonising the payments offered across the schemes would also make financial sense. Financing the integration of refugees with payments to their host family and local authorities is a much better social investment, and arguably a wiser financial investment too, than paying for the costly management of homelessness when family relationships break down. This harmonisation, in turn, would relieve local authorities of the pressure to parcel out resources based on Ukrainians' immigration status, and empower them to channel financial investments to the communities that need them most. After all, local authorities will require funds to support Ukrainians out of homelessness, regardless of whether they were evicted by sponsors, family, or private landlords. The financial support offered by central government should acknowledge this shared need, and extend payments to the UFS and UES.

Make the schemes a route to settlement. Although everyone hopes for a swift end to the war in Ukraine, the conflict may persist and the displacement of Ukrainian refugees could be permanent. Many Ukrainians are already starting to lay down roots in the UK, by taking up work, enrolling their children into local schools, and making social and financial investments for their future in the UK. It is only fair, we believe, and in the UK's interest, that these individuals should be offered the opportunity to settle permanently in the UK after the expiry date of the current schemes. Though many Ukrainians will choose to return, as some of them have done already, the option of settlement will also allow the UK to make the most of the significant financial, and social efforts invested in responding to the humanitarian crisis in Ukraine, and cultivating the value of an increasingly diverse society. This, surely, is a positive outcome for all.

7.2 PERFECTING IMPLEMENTATION

Expedite the issuing of BRPs for Ukrainians. A significant minority (7%) of Ukrainians were yet to receive their BRPs at the time they filled out our survey, with average waits of 3.3 weeks, and considerably longer periods of 9 and even 8 weeks for applicants to the UFS and UES. We would argue that once applications to the government's Ukraine schemes are approved, Ukrainian refugees should not have to face the additional distress caused by administrative delays in producing BRP cards. As Ukrainian refugees attempt to grapple with their new lives in the UK, it is important for each individual to have easy access to a single, physical document demonstrating their permission to be in the UK. This is even more necessary given the UK's regime of immigration checks and enforcement. Simply put, it cannot be right for some Ukrainian refugees to have to wait months in order to acquire this simple, yet vital document. Issuing BRP cards on time, and with the same level of expediency across the schemes, needs to be made a priority for the Home Office.

Give Ukrainians and caseworkers an effective means of escalating cases to decision makers. Despite the efforts of government and civil society to quickly implement, and support refugees through the routes to safety, responding to humanitarian crises presents unique challenges. Administrative glitches such as refugees' inability to produce all necessary documents, or indeed the Home Office's delay in issuing them with a decision on time, can have significant human and financial costs. To mitigate this, direct and dedicated channels of communication need to be established to decision makers at key departments (including the Home Office and DHLUC), so that specific issues can be raised and resolved contemporaneously. A dedicated channel would be particularly useful for caseworkers and advisers across civil society. As many Ukrainians have and will turn to third sector organisations for assistance, giving caseworkers a means of communicating quickly and effectively with decision makers can save time and buttress capacity, at the time when demand for immigration services is at an all-time high. This is not an entirely novel concept. The Home Office have set up and continue to operate the EU Settlement Resolution Centre, a dedicated service to assist EU nationals with their applications to the EU Settlement Scheme. By replicating a similar approach, decision makers at the Home Office and DHLUC can build their, and the advice sector's capacity, to assist those who are most vulnerable.

Revisit the value of payments, in line with the costs of living. Since March 2022, when DHLUC announced its £350/week thank you payments for sponsors, there have been two increases to the energy cap and a rise in inflation of nearly 3%,⁵⁶ bringing inflation to nearly 10% compared to last year. This has dramatically pushed the cost of living up, and thank you payments now need to reflect this change. An upwards adjustment in payments to sponsors is sorely needed, to prevent the risk of homelessness. Similarly, DHLUC should consider increasing payments based on the size of refugee families hosted. While £350 per month can make a substantial contribution to the bills and food costs of one person in one room, it is hardly enough to support a family, especially during winter months when household energy use is expected to rise.

7.3 SUPPORTING UKRAINIAN REFUGEES' INTEGRATION IN THE LONG-TERM

Prevent the risk of homelessness, before families end up on the street. Our caseworkers recounted several occasions when, attempting to report urgent cases of refugees facing eviction, they found that local authorities' telephone lines were busy, emails did not yield timely responses, and relevant council staff members were at capacity or unavailable. This is perhaps unsurprising, given the strain placed upon local authorities by years of austerity. However, even when contact had been established, some councils were simply unwilling to offer refugees any practical solutions until the very day of eviction. This culture of waiting for the crisis to hit is not only extremely damaging for Ukrainian refugees, who face destitution as a real prospect, but also for councils who miss out on a precious opportunity to exercise their duty to relieve homelessness in more cost effective ways – such as through mediation, supporting refugees with accessing the private rental sector, or by making use of their ability to refer homeless Ukrainians to local authorities across the country, where housing stock is higher. We would urge councils to give Ukrainian refugees, their hosts, and their caseworkers simpler ways of reporting the risk of homelessness, and to empower their own staff to act before families are evicted. After all, when it comes to homelessness, prevention is always better than treatment.

Consolidate the system of homelessness referral. Although the UK's housing crisis is a nationwide phenomenon, there are large variations in the availability of housing across different local authorities. We believe that more could be done to make use of available resources. This starts with better data collection. The figures we have on the extent of homelessness amongst the Ukrainian refugee community are incomplete, with as many as 30% of councils currently opting not to volunteer their data. In addition, anecdotal evidence from our caseworkers has found that when certain local authorities were approached to deal with Ukrainian refugee eviction, the response was simply that there was no available accommodation in the area, as if a national referral mechanism does not exist. Despite the local remit of authorities, councils need to ensure that tackling homelessness is a truly national effort, with active co-operation and optimisation of the current referral system. Staff need to be adequately trained to ensure that all those with a frontline-facing role are aware of the statutory duties and options available to them in the context of homelessness, including their ability to refer to other local authorities.

Support Ukrainians to access the private rental sector. Supporting sponsors and family members with thank you payments adjusted to the cost of living is an important short-term means of giving Ukrainian refugees more time to find employment, claim benefits, and develop their ability to access independent accommodation. However, relying upon the generosity of sponsors is not sustainable ad infinitum – and indeed, in cases where relationships break down, it may not be applicable at all. This is why additional solutions are needed to support refugees' access to the private rental sector. These could include:

- Enabling Ukrainians who exit their relationship with their sponsor to “passport” the thank you payment to their private landlord;
- Guaranteeing deposits and 6 months of rent for those who struggle to gather down payments, possibly by using some of the £10,500 payment given by DHLUC to local authorities;

- Incentivising lettings agencies to rent to low-income households, with creative solutions such as cuts in business rates; and
- Facilitating information sharing around access to benefits, renters' rights and local support to the Ukrainian community.

Invest in employability. Without overstating the urgency of evictions, it is important to acknowledge the fact that, in the long term, supporting Ukrainian refugees who can work to enter the labour market, is the most sustainable way of enabling them to build independent livelihoods in the UK. Labour market integration efforts would also be firmly within the spirit of the government's levelling up initiative. We believe that this can be achieved by:

- Investing in English-language classes;
- Investing in local employability programmes; and
- Implementing simple, sector-specific means of recognising overseas work qualifications.

Develop a refugee integration strategy. While central government, local authorities and communities have made significant efforts to welcome Ukrainian refugees, the response has been reactive and piecemeal. It is important for the UK government to acknowledge that the humanitarian crisis is not only an acute issue that requires an immediate reaction, but is also likely to lead to the creation of a long term community of Ukrainians in the UK. If within the first few weeks their needs have been focused on obtaining immigration status and accommodation, these needs are now more complex, pertaining to integration into the labour market, schools, public services and life in the UK more generally. Meeting these needs requires careful planning of resources, clear communication and division of labour between government departments and systems of monitoring refugee integration initiatives, including regular consultations with frontline community leaders.

Seize the opportunity to address structural challenges. Without a doubt, many of the challenges facing Ukrainian refugees are not unique to this community. The risk of homelessness and local authorities' long-term reliance on temporary accommodation have been widely documented in the case of previous refugee arrivals from Syria and Afghanistan. The unaffordability of the private rental sector has also affected young and low-income Britons for years – and much research has pointed to the unaffordability of childcare, which for years has prevented parents, mostly mothers, from returning to work, in the same way it prevents the employment of Ukrainian women today. We believe that six months after the Russian invasion of Ukraine started, government has not only an opportunity to assess its response to the humanitarian crisis, but also to rebuild the UK's ability to cultivate the social mobility of all vulnerable communities. We suggest this starts with an examination of housing stock and practices of exclusion across the private rental sector, and continues with an examination of the structural barriers to employment, which affect parents of young children, and people who live in rural areas of the UK.

ABOUT WORK RIGHTS CENTRE

Work Rights Centre is a registered charity dedicated to supporting migrants to access employment justice, and improve their social mobility. We do this by providing free and confidential advice in the areas of employment, immigration, and social security, and by mobilising frontline intelligence to address the systemic causes of migrants' inequality. The charity was founded in 2016. Ever since, we have advised over 4,000 people, helped recover over £170,000 in unpaid wages and fees, and supported hundreds more to make job applications and secure their immigration status.

Our frontline service consists of two multilingual teams of advisers who operate in London (5 days a week) and Manchester (on Saturdays). Together, the advice team assist an average of 20 beneficiaries a week, with issues which range from non-payment, insecure immigration status, and career advice. You can support their work at <https://www.workrightscentre.org/support-us>

Published: 27 September 2022

Authors: Dora-Olivia Vicol and Adis Sehic

Cite: Vicol, D.O., Sehic, A. (2022). *Six months on: The UK's response to the humanitarian crisis in Ukraine, and how the government can better protect refugees* [Available online]

[@WORCRights](#)

[Work Rights Centre](#)

<https://www.workrightscentre.org/>

WoRC
Work Rights Centre

ACKNOWLEDGEMENTS

We are grateful for the valuable insights provided by many friends and colleagues across the sector: Ksenija Peniaz, Andrei Savitski, Dmitri Macmillen, John Vassiliou, Dr Ella Cockbain, Kate Roberts, Renae Mann, Kama Petruczenko, Mariia Ustymenko, Mala Savjani, Lauren Scott, Anais Crane and many others. We'd also like to thank the Ukraine Advice Network run by the EERC, and all organisations who supported the dissemination of the survey and the refinement of recommendations. Finally, we are grateful to the Justice Together Initiative, Paul Hamlyn Foundation, Trust for London, and the AB Trust for funding our work with the Ukrainian community.

¹ Mark Sweney and Graeme Wearden, "Global Markets Tumble as Russia-Ukraine Tensions Hit Shares.", *The Guardian*, 14 February 2022. sec. Stock markets, <https://www.theguardian.com/business/2022/feb/14/global-markets-tumble-russia-ukraine-tensions-hit-shares-ftse-100>

² Richard Partington, "Inflation in Eurozone Hits Record 8.6% as Ukraine War Continues.", *The Guardian*, 1 July 2022, sec. Eurozone, <https://www.theguardian.com/business/2022/jul/01/inflation-in-eurozone-hits-record-86-as-ukraine-war-continues#:~:text=Inflation%20across%20the%20eurozone%20has,the%20cost%20of%20living%20crisis.>

³ UNHCR Hong Kong, "Ukraine-Fastest Growing Refugee Crisis in Europe Since WWII.", 6 June 2022, <https://www.unhcr.org/hk/en/73141-ukraine-fastest-growing-refugee-crisis-in-europe-since-wwii.html>

⁴ UNHCR, Operational Data Portal, Ukraine Refugee Situation, <https://data.unhcr.org/en/situations/ukraine> [accessed on 20 September 2022]

⁵ UNHCR, "Ukraine Situation Flash Update #27.", 26 August 2022, <https://data.unhcr.org/en/documents/details/95150>

⁶ "World Economic Outlook, April 2022."

⁷ Office for National Statistics, "Consumer Price Inflation, UK - Office for National Statistics.", July 2022, <https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/consumerpriceinflation/july2022>

⁸ Corlett and Try, "In at the Deep End.", Resolution Foundation Briefing, September 2022, <https://www.resolutionfoundation.org/app/uploads/2022/08/In-at-the-deep-end.pdf>

⁹ Home Office, "Ukraine Family Scheme, Ukraine Sponsorship Scheme (Homes for Ukraine) and Ukraine Extension Scheme Visa Data.", updated 22 September 2022, <https://www.gov.uk/government/publications/ukraine-family-scheme-application-data/ukraine-family-scheme-and-ukraine-sponsorship-scheme-homes-for-ukraine-visa-data--2>.

¹⁰ The European Union triggered the Temporary Protection Directive (Council Directive 2001/55/EC of 20 July 2001) on 4 March 2022. This is currently retained EU law under the UK's Immigration Rules – see Immigration Rules part 11A: temporary protection.

¹¹ London Metropolitan University, "Thousands of Afghan refugees living in UK hotels, one year from Taliban takeover", 19 August 2022, <https://www.londonmet.ac.uk/news/spotlight/thousands-of-afghan-refugees-living-in-uk-hotels-one-year-from-taliban-takeover/>

¹² Home Office, "Further support for Ukrainians fleeing Russia invasion", 1 March 2022, <https://www.gov.uk/government/news/further-support-for-ukrainians-fleeing-russia-invasion>

¹³ Home Office, "Ukraine Family Scheme, Ukraine Sponsorship Scheme (Homes for Ukraine) and Ukraine Extension Scheme Visa Data.", updated 22 September 2022, <https://www.gov.uk/government/publications/ukraine-family-scheme-application-data/ukraine-family-scheme-and-ukraine-sponsorship-scheme-homes-for-ukraine-visa-data--2>.

¹⁴ Grierson, "Refugee Groups Criticise Gaps in UK's Ukraine Response.", 13 March 2022, *The Guardian*, sec. Immigration and Asylum, <https://www.theguardian.com/uk-news/2022/mar/13/refugee-groups-criticise-gaps-in-uks-ukraine-response>

¹⁵ Home Office, "Ukraine Scheme Guidance.", 11 March 2022, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1060447/ukraine-scheme-guidance.pdf

¹⁶ Home Office, "Apply for a Ukraine Family Scheme Visa.", 4 March 2022 [last updated 23 July 2022], <https://www.gov.uk/guidance/apply-for-a-ukraine-family-scheme-visa#:~:text=The%20Ukraine%20Family%20Scheme%20allows,UK%20and%20access%20public%20funds.>

¹⁷ Home Office, "Ukraine Family Scheme, Ukraine Sponsorship Scheme (Homes for Ukraine) and Ukraine Extension Scheme Visa Data.", updated 22 September 2022, <https://www.gov.uk/government/publications/ukraine-family-scheme-application-data/ukraine-family-scheme-and-ukraine-sponsorship-scheme-homes-for-ukraine-visa-data--2>.

¹⁸ Home Office, "Apply to Stay in the UK under the Ukraine Extension Scheme.", 3 May 2022 [last updated 13 June 2022], <https://www.gov.uk/guidance/apply-to-stay-in-the-uk-under-the-ukraine-extension-scheme>

¹⁹ Home Office, "Ukraine Extension Scheme: caseworker guidance.", 9 May 2022 [last updated 15 September 2022], <https://www.gov.uk/government/publications/ukraine-extension-scheme-caseworker-guidance>

²⁰ Home Office, "Homes for Ukraine: sponsor guidance", 25 March 2022 [last updated 5 August 2022], <https://www.gov.uk/guidance/homes-for-ukraine-sponsor-guidance#further-support>

²¹ Home Office, "Homes for Ukraine Scheme.", 14 March 2022 [last updated 29 July 2022], <https://www.gov.uk/guidance/homes-for-ukraine-scheme-frequently-asked-questions#linking-up-with-a-guest>

²² Home Office, "Homes for Ukraine: sponsor guidance", 25 March 2022 [last updated 5 August 2022], <https://www.gov.uk/guidance/homes-for-ukraine-sponsor-guidance#further-support>

²³ Lord Richard Harrington to Clive Betts MP, 29 March 2022, <https://committees.parliament.uk/publications/9516/documents/161778/default/>

²⁴ Home Office, "Oral Statement to Parliament, Home Secretary's Topical Statement on Ukraine.", 28 February 2022, <https://www.gov.uk/government/speeches/home-secretarys-topical-statement-on-ukraine>

²⁵ Nelson, "Ukrainian Fruit Pickers in UK Panic over Priti Patel's Changes to Visa Rules."

²⁶ Bathke, "IOM Takes Stance against Discrimination of Non-Ukrainian Refugees.", *InfoMigrants*, 12 April 2022, <https://www.infomigrants.net/en/post/39741/iom-takes-stance-against-discrimination-of-nonukrainian-refugees>

²⁷ Taylor, 'Ukrainian Workers Flee "Modern Slavery" Conditions on UK Farms'., *The Guardian*, 19 April 2022, <https://www.theguardian.com/uk-news/2022/apr/19/ukrainian-workers-flee-modern-slavery-conditions-on-uk-farms>

-
- ²⁸ Immigration Rules, Appendix Ukraine Scheme, UKR21.3, <https://www.gov.uk/guidance/immigration-rules/immigration-rules-appendix-ukraine-scheme>; For UES caseworker guidance, see here: <https://www.gov.uk/government/publications/ukraine-extension-scheme-caseworker-guidance>
- ²⁹ Syal and Taylor, "Ukrainians Who Come to UK Illegally Could Be Sent to Rwanda, Johnson Says.", 23 June 2022, *The Guardian*, sec. Immigration and Asylum, <https://www.theguardian.com/uk-news/2022/jun/23/ukrainians-who-come-to-uk-illegally-could-be-sent-to-rwanda-johnson-says>
- ³⁰ Office for National Statistics, "CPIH ANNUAL RATE 00: ALL ITEMS 2015=100 - Office for National Statistics.", 17 August 2022, <https://www.ons.gov.uk/economy/inflationandpriceindices/timeseries/l55o/mm23>
- ³¹ Facebook et al., "What Is the Energy Price Cap?", *Money Saving Expert*, Updated 30 August 2022, <https://www.moneysavingexpert.com/utilities/what-is-the-energy-price-cap/>
- ³² Home Office, "Immigration Information for Ukrainians: next steps after arriving in the UK (accessible version).", 18 May 2022, <https://www.gov.uk/government/publications/immigration-information-for-ukrainians-in-the-uk-your-next-steps/immigration-information-for-ukrainians-next-steps-after-arriving-in-the-uk-accessible-version>
- ³³ Bryant and Townsend, "50,000 Ukrainian refugees in UK facing homelessness 'disaster' next year", *The Guardian*, 28 August 2022, <https://www.theguardian.com/world/2022/aug/28/50000-ukrainian-refugees-in-uk-facing-homelessness-disaster-next-year-homes-for-ukraine>
- ³⁴ Office for National Statistics, "Visa Holders Entering the UK under the Ukraine Humanitarian Schemes – Follow-up Survey: 20 July to 4 August 2022 - Office for National Statistics.", 26 August 2022, <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/bulletins/visaholdersenteringtheukundertheukrainehumanitarianschemes/visaholdersenteringtheukundertheukrainehumanitarianschemesfollowupsurvey20julyto4august2022>
- ³⁵ See s189B(1) and s.195(1) of the Housing Act 1996, <https://www.legislation.gov.uk/ukpga/1996/52/data.pdf>
- ³⁶ *R v Westminster CC ex p Castelli and Tristran-Garcia* (1996) 28 HLR 617, CA, <https://www.ucpi.org.uk/wp-content/uploads/2017/11/R-v-Westminster-ex-p-Castelli-1996-28-HLR-125.pdf>
- ³⁷ The Homelessness (Suitability of Accommodation) (Amendment) (England) Order 2022, <https://www.legislation.gov.uk/uksi/2022/521/made/data.pdf>
- ³⁸ 'Amended Homelessness Regulations Remove Hard-Won Rights'.
- ³⁹ Department for Levelling Up, Housing & Communities "Homelessness Code of Guidance for Local Authorities.", 22 February 2018 [last updated 1 June 2022], https://assets.publishing.service.gov.uk/media/5ef9d8613a6f4023cf12fc67/current_Homelessness_Code_of_Guidance.pdf
- ⁴⁰ Department for Levelling Up, Housing and Communities, "Homelessness Management Information - Ukrainian Nationals: England.", 16 June 2022 [last updated 8 September 2022],

<https://www.gov.uk/government/publications/homelessness-management-information-ukrainian-nationals-england#full-publication-update-history> – as the data notes indicate, due to data protection, totals may not equal the sum of components provided by various local authorities as they have been rounded.

⁴¹ The table represents London boroughs which had a total of 5 or more Ukrainian households that were owed a prevention or relief duty. Incomplete or no data was submitted for the London boroughs of Barking & Dagenham, Bexley, Camden, Croydon, Ealing, Hammersmith & Fulham, Harrow, Havering, Hillingdon and Waltham Forest.

⁴² PropertyMark, "A Shrinking Private Rented Sector.", 6 June 2022, <https://www.propertymark.co.uk/resource/a-shrink==ing-private-renter-sector.html>

⁴³ PropertyMark, "Large Decrease in London Rental Properties.", 31 January 2022, <https://www.propertymark.co.uk/resource/large-decrease-in-london-rental-properties.html>

⁴⁴ Office for National Statistics, "Index of Private Housing Rental Prices, UK: July 2022.", 17 August 2022, <https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/indexofprivatehousingrentalprices/july2022>

⁴⁵ SpareRoom, "Average Rent in London.", August 2022, <https://m.spareroom.co.uk/content/info-landlords/average-rent-london>

⁴⁶ Office for National Statistics, "Average Weekly Earnings in Great Britain - Office for National Statistics.", 16 August 2022, <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/averageweeklyearningsingreatbritain/august2022#average-weekly-earnings-data>

⁴⁷ Department for Work & Pensions, "Benefit and Pension Rates 2021 to 2022.", updated 8 July 2021, <https://www.gov.uk/government/publications/benefit-and-pension-rates-2021-to-2022/benefit-and-pension-rates-2021-to-2022#universal-credit>

⁴⁸ Department for Work and Pensions, "Universal Credit.", accessed 8 September 2022, <https://www.gov.uk/universal-credit/what-youll-get>

⁴⁹ Anon, 2 July 2020, http://nearlylegal.co.uk/wp-content/uploads/2020/07/20.07.02-Redacted-Court-Order.pdf?utm_source=mailpoet&utm_medium=email&utm_campaign=new-on-nearly-legal-newsletter-total-new-posts_1

⁵⁰ Moore, "No DSS: Landmark court ruling declares housing benefit discrimination is unlawful.", 14 July 2020, <https://blog.shelter.org.uk/2020/07/no-dss-landmark-court-ruling%E2%80%AFdeclares%E2%80%AFhousing-benefit%E2%80%AFdiscrimination%E2%80%AFis%E2%80%AFunlawful%E2%80%AF/>

⁵¹ Department for Levelling Up, Housing and Communities, "English Private Landlord Survey 2021: main report", 26 May 2022, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1078643/EPLS_Headline_Report_2021.pdf

⁵² Department for Levelling Up, Housing and Communities, "A Fairer Private Rented Sector.", 16 June 2022 [last updated 2 August 2022], <https://www.gov.uk/government/publications/a-fairer-private-rented-sector/a-fairer-private-rented-sector>

⁵³ Das and Townsend, 'Ukrainians Face a Homeless Future in the UK Thanks to Red Tape on Renting'. *The Guardian*, 19 June 2022, <https://www.theguardian.com/uk-news/2022/jun/19/ukrainians-face-a-homeless-future-in-the-uk-thanks-to-red-tape-on-renting>

⁵⁴ Department for Levelling Up, Housing and Communities, "A Fairer Private Rented Sector.", 16 June 2022 [last updated 2 August 2022], <https://www.gov.uk/government/publications/a-fairer-private-rented-sector/a-fairer-private-rented-sector>

⁵⁵ Apeageyi, "Two Big Wins in the Fight against DSS Discrimination.", Shelter, 7 March 2019, <https://blog.shelter.org.uk/2019/03/two-big-wins-in-the-fight-against-dss-discrimination/>

⁵⁶ Office for National Statistics, "Consumer Price Inflation, UK: August 2022." 14 September 2022, <https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/consumerpriceinflation/august2022>