

November 2021

HOME FOR ALL

Why EU citizens are more likely
to experience homelessness -
and why it matters

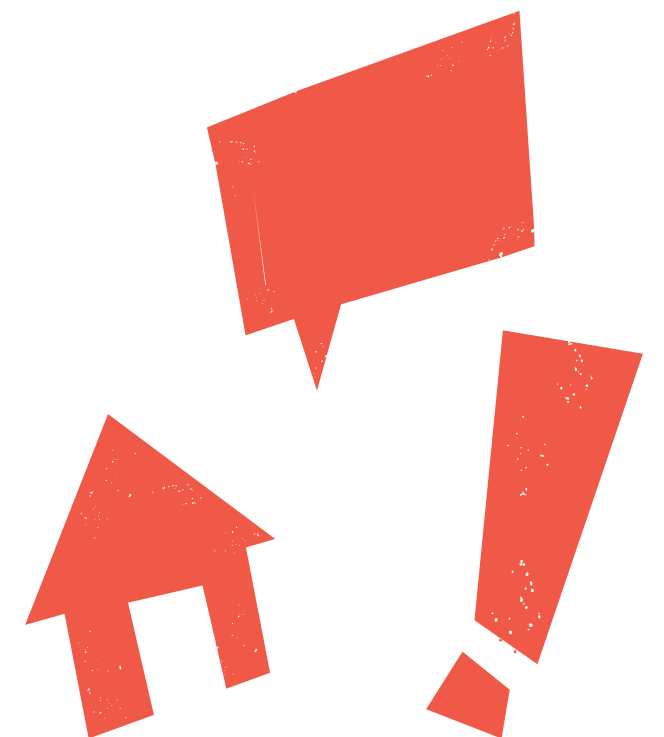
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Together
we will end
homelessness

Contents

About Crisis	4
Foreword	6
Executive Summary	10
Introduction	14
Policy Context: Brexit and the EU Settlement Scheme	18
EU research findings: Scale and demographics	30
EU research findings: Causes of homelessness	37
Why we need action now to support EU citizens out of rough sleeping	48
Conclusion	71
Appendices	74



About Crisis

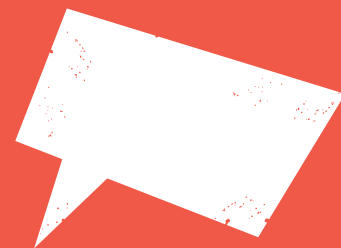
Crisis is the national charity for people facing homelessness. We help people directly out of homelessness, and campaign for the changes needed to solve it altogether. We know that together we will end homelessness.



About Home for All

The Home for All campaign is calling for a new approach to ending homelessness. That means a renewed strategy that prioritises housing and giving people the support they need to keep a home, including the rollout of Housing First. Support to move out of homelessness must be accessible to everyone who needs it, building on the successful approach taken in response to the Covid-19 pandemic.

Without this, we believe Government will not meet its manifesto commitment to end rough sleeping by 2024. Long-term, our goal is to end all forms of homelessness and, where possible, prevent it from arising in the first place.



Foreword

Jon Sparkes, Crisis Chief Executive

The start of the pandemic saw an unprecedented and immediate transformation in national governments' approaches to homelessness across England, Scotland and Wales. The profound impact that homelessness has on people's health was quickly recognised and we saw bold action being taken to protect people from the dangers of the virus.

With the strong leadership of national governments, and the extraordinary efforts of local authorities and homelessness organisations, tens of thousands of people were quickly helped into safe accommodation. For the first time, people were helped based on need alone, regardless of who they were or where they were from.

Many people who have built their lives in Britain, who are working here, raising families here and are a vital part of our communities, find themselves turned away from support at the moment they need it most simply because of where they were born. During the pandemic, these barriers came down and people who had previously been locked out of most support were able to get vital help to move out of homelessness. However, as the pandemic continued

the 'Everyone In' message became less clear and we saw increasing numbers of people struggling to access this support. Many of those who remain in emergency accommodation are non-UK nationals who continue to face barriers to getting the support they need to move out of homelessness. Even more people are sleeping rough, staying in cars, tents or on public transport, or are sleeping on other people's sofas and floors, unable to get the help they need to find a proper home.

Our research shows that EU citizens living in Britain are almost twice as likely to experience the worst forms of homelessness in comparison to the general adult population. The drivers of homelessness for EU nationals have much in common with those experienced by the wider population, but they are compounded by additional restrictions that impact on the support that some EU citizens can access. This means that when people find themselves struggling, whether because of bereavement, a relationship breakdown or illness, they are left without a proper safety net. This pushes people into homelessness and can leave people living in limbo, trying to resolve their housing and

employment issues, without any support to help them in the interim.

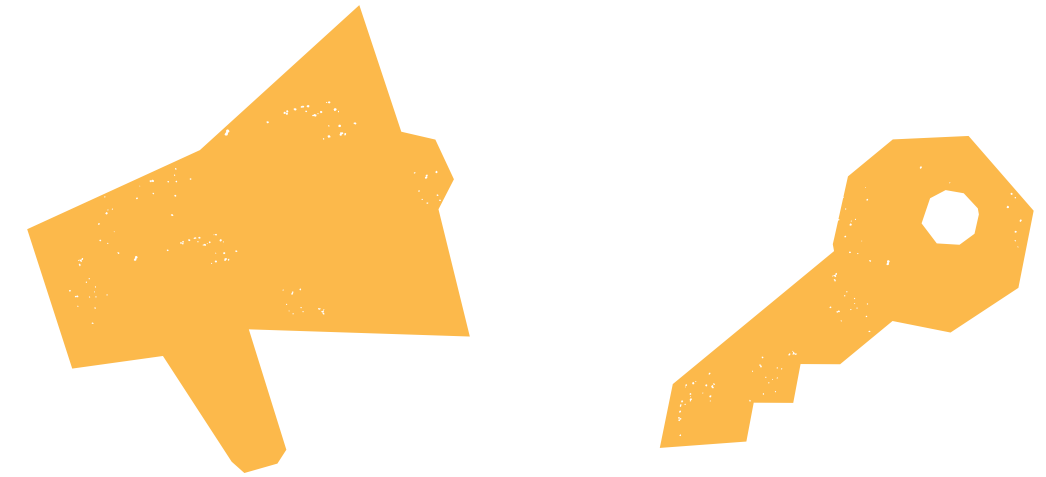
As we emerge from the pandemic, we must take this opportunity to make sure that protection from homelessness is there for everyone who has made their home here. We need a renewed Rough Sleeping Strategy in England that tackles both the long-term drivers of homelessness, such as the chronic shortage of genuinely affordable homes, and more immediately, the consequences of homelessness, making sure the right support is always there for everyone who needs it.

By investing in a bespoke package of emergency accommodation and specialist employment support for EU citizens who face barriers to accessing the usual avenues of support, we can enable people to find secure, properly paid employment that will allow them to move out of homelessness for good.

The action taken during the pandemic showed us we can do things differently. Now is the time for the Westminster Government to build on this progress and set out a bold new vision to achieve the commitment to end rough sleeping by providing a home for all.



Foreword



Experts by experience group

We are three EU citizens who have all lived in the UK for many years and are working with Crisis as Experts by Experience. We all came here to live and work, to build our lives and enjoy the opportunities that we all shared as Europeans, and we brought with us skills and high levels of education. We've done jobs as varied as working in industry, working for charities and working in the theatre. One of us has brought up children here. We came with hopes and dreams.

But we also have one other common experience, which is homelessness.

We have all shared those devastating feelings of powerlessness, the loss of control over events, the loss of privacy and dignity that so often accompany homelessness. Between us we've known some of the most severe forms of homelessness, rough sleeping, shelters, hostels and sofa-surfing. We've come into contact with many others in similar situations, have seen some drawn into alcohol or drug abuse, exploited by unscrupulous employers and other precarious lifestyles.

Because we are all Europeans people often assumed we knew our way round the system, that we knew

where to get help when we needed it and that the help was actually available to us. That wasn't the case. There are barriers to help wherever you turn, whether it be language, lack of knowledge or immigration status. All of us have the experience of approaching councils, Jobcentres and other services for help and being told that there was nothing that they could do. It was only when we came into contact with organisations like Crisis and other homelessness services that we got any help and support to enable us to begin to put these experiences behind us and start to move forward.

Then came Brexit. Whatever the merits or failings of Britain leaving the EU, we all felt it as a sea-change in our experience of living in the UK. The referendum debate was undoubtedly a racially charged one at times and we have all felt its chill effect one way or another. EU citizens were too often characterised as freeloaders and a burden, with our positive contribution to the UK disregarded. Regardless of our settled status in the UK, we all feel less welcome that we once did. We now have to show our papers, in a way we never did before.

Practically it also means that there is a loss of our democratic position,

we can't even vote in local elections now. Our voice is not heard anywhere. Many of our rights have been lost, even before Brexit. We feel excluded and isolated. We worry that we will be forgotten in the levelling up discussion.

That's why this report is so important.

For a start, it tells us that EU nationals are almost twice as likely to experience homelessness as the general adult population and almost three times as likely to experience rough sleeping. The scale of the problem is clear. It's obvious that people like us are not getting the help that we need to prevent homelessness, with all the damage it does to us as individuals and to the society that we all live in.

This report makes recommendations which would mean that no one would be forced to sleep rough. People could be supported back into stable employment and a long-term home, getting the advice they need from a dedicated mentor to navigate them through the system. We all know what difference that could have made to us and the many others who have been through similar experiences.

This is good for us all. Not just those of us who might avoid the devastating

experiences we have talked about, but for our shared society here in the UK where we will be able to continue to contribute our skills and talents. While we are able to do that, we can repair our broken sense of belonging.

What has happened during the pandemic tells us that political will can move mountains. We urge the Government to take the recommendations on board and make them central to meeting the manifesto commitment to end rough sleeping. We urge everyone else who reads this to get behind the calls which benefit us all and build a stronger society so that we can end homelessness together.



Jan



Katia

Experts by Experience panel members

Executive summary

As a society, we must make sure that everyone can access help to prevent or resolve their homelessness, regardless of where they are from. Currently this is not the case for far too many EU citizens living in the UK.

The worst forms of homelessness have been rising year-on-year in England over the last decade, with rough sleeping rising significantly. But the onset of the pandemic saw an unexpected and considerable shift in the Government's approach to tackling homelessness and rough sleeping through the understanding that being without a safe and stable home is a public health issue.

Shortly before the first lockdown was announced, the Westminster Government instructed local authorities to help all people sleeping rough and staying in accommodation where they could not self-isolate, into emergency accommodation where they had their own room with washing facilities. Similar action was taken by the Welsh and Scottish Governments. This meant that homelessness support across Britain was opened up to everyone in need for the first time, regardless of immigration status, vulnerability or local connection.

However, although this unprecedented action helped many people get the help they needed to move off the streets, gaps in support remained, especially for non-UK nationals. Many people have few move on options as their immigration status means they

are unable to access vital support services. This includes some EU citizens who are eligible for status under the EU Settlement Scheme, but who continue to face restrictions on the support they can access that would help them to move out of homelessness.

In recent years, Crisis services have been working with a growing number of people originally from outside the UK who are being pushed into homelessness here, including significant numbers of EU citizens. However, our understanding of the specific experiences and causes of homelessness for this group has been limited by gaps in the data that is collected and high levels of hidden homelessness among this group.

Crisis commissioned Heriot-Watt University and IPPR to conduct research looking at the scale and experiences of homelessness among EU citizens living in Britain to help address this evidence gap. The findings provide a comprehensive picture of the causes and impact of homelessness among EU citizens across Britain, as well as estimates of the number of EU citizens experiencing the worst forms of homelessness.

The scale of homelessness among EU citizens

In total, an estimated 22,000 EU national households were experiencing core homelessness¹ at a point in time in the 2019 period. Core homelessness captures some of the most severe and immediate forms of homelessness and includes people who are rough sleeping; living in unconventional forms of accommodation, such as cars, tents or sheds; staying in unsuitable temporary accommodation, including B&Bs and other nightly paid, non-self-contained accommodation; staying in hostels, refuges or shelters; and sofa surfing.

EU citizens made up around nine per cent of the total number of people estimated to be experiencing some of the worst forms of homelessness at this time. EU citizens are estimated to make up around five per cent of the total British population, demonstrating that the risk of experiencing homelessness for EU nationals in Britain is virtually double the risk for the population as a whole. The risk is even higher for rough sleeping, with EU nationals estimated to be around 15 per cent of the total number of people rough sleeping across Britain. This suggests that the risk of EU nationals experiencing rough sleeping in Britain is almost three times the risk for the general population.

Drivers of homelessness for EU citizens

The drivers of homelessness are rarely straight forward, and often multiple factors will combine to push someone into homelessness. The research found that the causes of homelessness for EU citizens usually included a combination of structural factors, like employment conditions and housing

supply, individual and relational factors, such as relationship breakdown, and systemic barriers that prevented people from accessing sufficient support.

Losing a job, struggling to find secure and adequately paid work and a lack of income were all critical factors in the situation of EU nationals experiencing rough sleeping and other forms of homelessness. A third of people who had recently experienced rough sleeping and a quarter of those who had experienced other forms of homelessness were unemployed before the Covid-19 pandemic, and these proportions rose substantially when the pandemic hit. Many participants in the research had experiences of insecure and exploitative work and reported not being paid enough to live on or, in some cases, not being paid at all.

For people who had recent experience of rough sleeping 59 per cent reported having no income before the pandemic hit, while another 13 per cent were destitute or severely poor, with only 11 per cent above the poverty line. Nearly half of those who were on clearly inadequate incomes were not receiving any benefits, suggesting that a lack of effective access to the benefit system is a major factor in the homelessness and severe poverty experienced by EU nationals.

For many participants in the research, personal and relationship problems contributed to their homelessness, creating a domino effect when combined with job losses, exploitative working conditions and a lack of income. Family conflict, relationship breakdown and bereavement were all triggers for people's homelessness. Poor health was also a factor for some people, which prevented them from working and made it difficult to cover

¹ Throughout this report when we refer to homelessness in relation to the findings of the research we are using the 'core homelessness' definition developed for Crisis and described in full in Bramley (2017) *Homelessness projections: Core homelessness in Great Britain*, London: Crisis. https://www.crisis.org.uk/media/237582/crisis_homelessness_projections_2017.pdf and Fitzpatrick et al (2021), *The Homelessness Monitor: England 2021*, ch.5 www.crisis.org.uk

their housing costs. Substance misuse, primarily with alcohol, was used as a coping mechanism by some, and this both exacerbated and contributed to people's housing difficulties.

While many of the individual factors that triggered people's homelessness at least partially mirror those experienced by the general population, they are compounded by a further set of factors based on the barriers individuals faced to accessing sufficient support. In many cases, participants who faced a loss of employment and challenging financial circumstances were left without an adequate safety net, which worsened and prolonged their housing difficulties. Sometimes this was due to language or cultural barriers that made it harder for EU citizens to access mainstream support that should have been available to them, while others were unable to get help for their housing situation – in particular, through welfare benefits – as a result of rules restricting EU citizens' access to support. This left people in extended periods of limbo while they tried to resolve their accommodation and employment issues, without any support to help them in the interim.

What needs to change

It is clear that EU citizens are significantly more likely to experience homelessness in comparison to the general population and that the existing offer of support is not working for many people in this group. A new strategy to end homelessness is needed that addresses the specific barriers that affect people who are not originally from the UK and tackles the issues that are forcing people to sleep rough in the first place. This must include action to tackle the structural factors that currently make it more difficult for many EU citizens to find and sustain an affordable home.

Extending eligibility to benefits and

homelessness assistance for EU citizens with pre-settled status would ensure that support is there for people if they experience life events that put them at risk of losing their home, whether that is a loss of employment, bereavement or a relationship breakdown. This would strengthen the safety net and ensure that people can get help when they face difficult times, so that fewer people end up being pushed into homelessness.

A significant number of EU citizens are at greater risk of homelessness and are at risk of losing their rights to live and work in the UK, because they have not successfully secured status under the EU Settlement Scheme. Of those who have got status, many only have pre-settled status, meaning at some point in the next five years they will need to make a new application for settled status before their temporary leave runs out. To help prevent people from becoming homeless because of this, it is vital that any strategy to end homelessness includes action to address the current gaps in the availability of specialist immigration advice and casework support that is needed to help people get the status they are entitled to. The Government should also consider reducing the evidence requirements for converting pre-settled status to settled status so people are not left stuck in a situation where they are unable to extend their leave.

To help prevent homelessness wherever possible and ensure no one is put at greater risk of experiencing homelessness because of their immigration status, we need the Westminster Government to seize this opportunity and set out a truly cross-governmental strategy that ensures immigration, housing and welfare policies are designed around a shared goal of ending homelessness. Immigration policies that target people sleeping rough with enforcement action risk pushing people further from support, putting people at risk

of exploitative work, accommodation, and potentially modern slavery and are not an effective way to help people move out of homelessness. We urge the Government to focus on solutions that tackle the root causes of people's homelessness and help people to move on into safe and stable accommodation.

In the short-term, there are actions that can be taken now to provide immediate support for EU citizens who are struggling to access mainstream support and are currently sleeping rough or in temporary accommodation and facing returning to the streets. We are recommending that the Westminster Government bring forward funding for a bespoke package of housing and employment support for EU citizens whose needs are not being met by current programmes. This will make a real difference for people who are sleeping rough now.

In order to effectively reduce the numbers of EU citizens experiencing rough sleeping, this package of support should include:

- **Provision of emergency accommodation so people have a stable and safe place to stay while engaging with employment support.**
- **A lead worker for every individual** being supported through this programme to provide consistent, holistic support throughout a person's journey from rough sleeping into stable employment and a long-term home.
- **Support to find and sustain stable, consistent and properly paid employment.** Depending on each person's needs this may include the provision of training, help to overcome language barriers,

and support to access health services and specialist alcohol and substance misuse services.

- **Specialist welfare and immigration advice and advocacy** to ensure people can access the support services they are entitled to.
- **Help to move into and sustain long-term housing.** For most people, this is likely to mean support to find an affordable tenancy in the private rented sector.
- **Funding for interpreters** so language is not a barrier to accessing support.

As we emerge from the pandemic, the Government must seize this opportunity to set out a bold new vision that ensures everyone experiencing homelessness has a route to move into safe and stable housing. This must include support for EU citizens who have made their home here but who currently face barriers to accessing the support services that would help them move out of homelessness. Funding a tailored package of housing and employment support for EU citizens in this situation is a vital first step to helping people overcome these barriers and will be key to helping the Government meet their ambition to end rough sleeping in England in this parliamentary term.



Introduction

This report is the second in a series that will set out the policy and practice changes needed to end homelessness in England for good by providing a Home for All. Crisis has previously set out in comprehensive detail the full range of policies needed to end homelessness,² and these still stand, but this series of reports will tackle some of the immediate homelessness related dilemmas facing Government in the run up to the next general election.

The first Home for All report focused on Housing First and set out why it should be the default offer for people who are experiencing homelessness and have multiple and serious needs. Providing Housing First across all areas in England where it is needed would be a transformative measure that would make achieving the Government's 2024 manifesto commitment to end rough sleeping much more of a reality.

In this report, we will look at what else is needed to build on the progress of the measures taken to support people sleeping rough during the pandemic, focusing on what is needed to help EU citizens³ who were supported through

the Everyone In initiative but are now at risk of returning to the streets. New research, commissioned by Crisis and undertaken by Heriot-Watt University and IPPR, has found that EU citizens living in Britain are almost twice as likely to experience the worst forms of homelessness compared to the general adult population, and three times as likely to experience rough sleeping. Without taking action to put the right support in place for EU citizens who are currently homeless, and to address the issues that are pushing so many EU citizens into homelessness in the first place, it is unlikely the Government will achieve its goal of ending rough sleeping in England.

The onset of the pandemic saw an unexpected and considerable shift in the Government's approach to tackling homelessness and rough sleeping through the understanding that being without a safe and stable home makes homelessness a public health issue. Shortly before the first lockdown was announced, the Westminster Government instructed local authorities to help all people sleeping rough and staying in accommodation where they could not self-isolate into emergency accommodation where they had their own room with washing facilities. Similar action was taken by the Welsh and Scottish Governments. This meant that homelessness support across Britain was opened up to everyone in need for the first time, regardless of immigration status, vulnerability or local connection. Prior to this many non-UK nationals who were rough sleeping would have been excluded from most statutory support and were reliant on the limited support charities could provide, with accommodation often consisting of a temporary space in a communal night shelter over the winter months.

This transformative change in the response to rough sleeping happened overnight, and by early 2021 a reported 37,000 people in England had been supported out of rough sleeping and

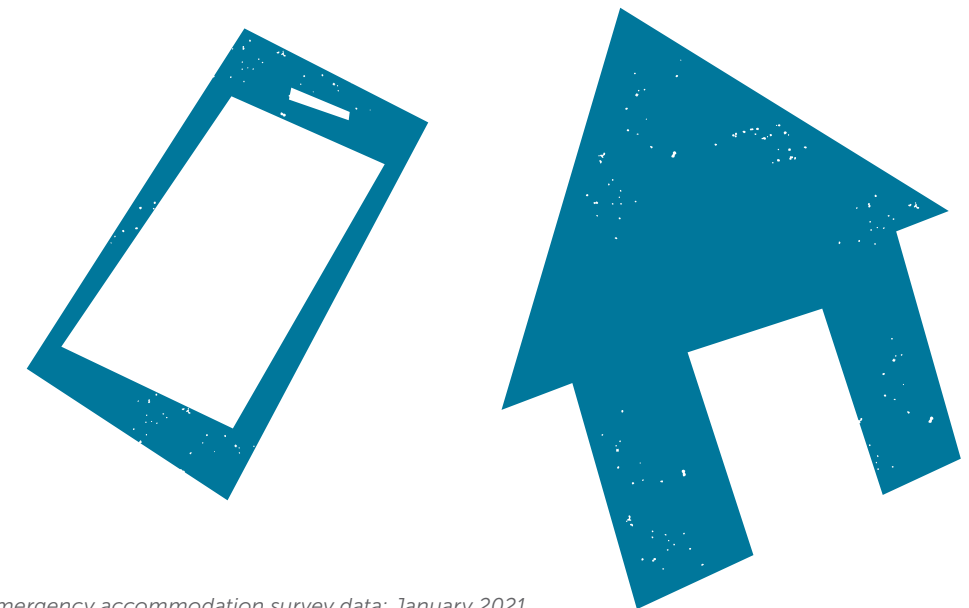
other precarious living situations into safe emergency accommodation.⁴ These measures were bold and lifesaving, and provided a lifeline which meant people sleeping rough and experiencing homelessness could access support regardless of where they were born.

However, despite its success there remained gaps in support, and a lack of clarity over the continuation of the Everyone In initiative in England made it more difficult for local authorities to end people's homelessness, especially for non-UK nationals with no recourse to public funds. This group have little to no move on options as they cannot access public funds, and this has left people stuck in limbo in emergency accommodation, and for some people, at risk of returning to the streets. This includes some EU citizens who are eligible for status under the EU Settlement Scheme, but who continue to face restrictions on the support they can access that would help them to move out of homelessness. It is clear that a new approach is needed now to support those people who remain excluded from mainstream support to move out of homelessness and into a stable home.

For EU citizens, this must include action to tackle the structural factors

- 2 Downie, M., Gousy, H., Basran, J., Jacob, R., Rowe, S., Hancock, C., Albanese, F., Pritchard, R., Nightingale, K. and Davies, T. (2018) *Everybody In: How to end homelessness in Great Britain*. London: Crisis
- 3 In this report we use 'EU citizens' as a shorthand to include citizens of the 27 member states of the EU; citizens of Iceland, Liechtenstein and Norway, who are all members of the European Economic Area (EEA); Swiss nationals, who are not members of EEA but have broadly the same rights as EEA nationals; and the qualifying non-EEA family members of EEA nationals, who also have EU free movement rights and are eligible to apply to the EU Settlement Scheme.

4 MHCLG (2021) *Coronavirus (COVID-19) emergency accommodation survey data: January 2021*



and systemic barriers that currently make it more difficult for many to find and sustain an affordable home. Our research found that losing a job, struggling to find secure and adequately paid work and a lack of income were all critical factors in the situation of EU nationals experiencing rough sleeping or wider forms of homelessness. Although individual factors, such as relationship breakdown and bereavement, were often a trigger for people's homelessness, these issues were compounded by a further set of factors based on the barriers individuals had faced to accessing sufficient support. In many cases people struggled to secure benefits, and the resulting lack of income was a key factor in people's homelessness because it meant they could not afford stable accommodation. The research found that a number of EU citizens were unable to get help for their housing situation – in particular, through welfare benefits – as a result of rules restricting EU citizens' access to support. This left people without an adequate safety net, living in limbo for extended periods of time while they tried to find work and resolve their homelessness.

The research also found evidence of EU citizens missing out on benefits they are entitled to because they weren't aware that they would be eligible or because language difficulties meant they struggled to convey their circumstances sufficiently. Increasing the availability of specialist welfare advisors who understand EU citizens' entitlements, ensuring that interpreters are always provided at Jobcentres for those who need them, and extending eligibility for welfare benefits for EU citizens with pre-settled status who are at risk of or experiencing homelessness would provide vital protection to prevent people from being pushed into homelessness in the first place.

To provide immediate support for EU citizens who are currently rough sleeping, or who are staying in temporary accommodation and facing being forced to return to the streets, there is also an urgent need for a tailored package of support to help people find stable, properly paid employment and move into a permanent, secure home. We estimate that the approximate cost of providing this tailored package of support to EU nationals who are currently sleeping rough would be around £32 million. This would include the cost of providing emergency accommodation, support with finding employment and learning English, providing interpreters, and paying rent in advance and deposit payments to help people move into a stable, long-term home.

As we emerge from the pandemic, the Government must seize this opportunity to set out a bold new vision that ensures everyone experiencing homelessness has a route to move into safe and stable housing. In this report, we focus on the urgent need for a new package of support for EU citizens who were helped by Everyone In but who are now at risk of falling through the cracks and returning to rough sleeping. This is essential if this Government is to successfully end rough sleeping in England in this parliamentary term.



Policy Context:

Brexit and the EU Settlement Scheme

Homelessness policy is the responsibility of national governments in England, Scotland and Wales, but the Westminster Government has responsibility for immigration policy across the UK. This means that decisions made in Westminster about immigration affect people in all three nations.

People's immigration status will often affect their eligibility for benefits and other statutory services and this means that many people who live in the UK but are originally from somewhere else have limited access to essential support services that help to prevent and relieve homelessness.

Up until 1 January 2021 EU citizens' rights to live and work in the UK had been based on EU free movement rights. EU citizens were only entitled to benefits and statutory homelessness services if they passed the habitual residence test, and only EU citizens with certain qualifying 'rights to reside' were eligible for support⁵. A qualifying

right to reside for the purpose of accessing benefits included the right to reside as a worker or self-employed person, a retained worker, and a family member, but it explicitly excluded people in their first three months of residence who only had an initial right to reside and those with the right to reside as a jobseeker⁶. This meant that the main route to eligibility for social assistance for EU citizens was through employment, with the possibility of entitlements being retained for short periods of unemployment where someone was actively looking for work. EU citizens would have a right to reside as a worker if their work was considered to be genuine and effective

5 For most EU citizens, there are two elements to the habitual residence test. The person must prove both that the UK is their main home and that they plan to stay there, and that they have a 'right to reside'. There are a number of routes through which someone can have a 'right to reside' that enables them to claim Universal Credit and this is the most complex aspect of the habitual residence test decision. For more detail see: <https://www.citizensadvice.org.uk/benefits/claiming-benefits-if-youre-from-the-EU/before-you-apply/check-if-you-can-pass-the-habitual-residence-test-for-benefits/>

6 Someone would be considered a jobseeker if they were looking for work and had a genuine chance of being employed.

and they could sufficiently evidence this.⁷

Studies have also shown that EU citizens are particularly vulnerable to being excluded from support through the benefits system, even where they should be eligible.⁸ This is partly a result of the complexity of the rules governing entitlements for EU citizens leading to incorrect decisions being made, and in some cases also due to racist or discriminatory attitudes. Language barriers can also be a compounding factor.

The rules determining who has a right to reside and the process of applying for welfare benefits have also been shown to further disadvantage some groups of EU citizens, including women and Roma migrants. The restrictive approach to defining worker status for the purpose of claiming benefits in the UK has been found to particularly disadvantage women because it means that much of the paid work that women are more likely to be engaged in, such as cleaning or paid care work, is not deemed sufficient to meet the criteria of a worker. Unpaid care work is also not recognised in this assessment. This has led to women being more vulnerable to being excluded from residence rights and access to social benefits. Research focusing on the experience of Roma rough sleepers in Westminster found that they had almost no knowledge of the UK welfare system. The minority who had employment were working long hours and being paid below minimum

wage, and so would likely be unable to evidence their employment sufficiently to meet the requirements of the habitual residence test.⁹ There is also evidence that people of Roma origin experience discrimination in the UK¹⁰, and people who are homeless and of Roma origin have reported experiencing prejudice from statutory services.¹¹

Brexit has led to further changes in entitlements for EU citizens currently living in the UK or planning to move here. Following Brexit and the end of arrangements for free movement between the UK and the EU, new rules have come into force. As of January 2021, newly arriving EU citizens no longer have a guaranteed right to live and work in the UK and are subject to immigration control. This means that newly arriving EU citizens to the UK need to be granted leave to enter or remain in order to reside in the UK and therefore need to apply for the relevant visa.

EU citizens who were living in the UK by 31 December 2020 have had to apply to the EU Settlement Scheme to retain their rights to live here. Those who successfully apply to the scheme will either receive settled or pre-settled status, depending on how long they have been living in the UK. EU citizens who have lived in the UK for more than five years will usually be granted settled status, and will then automatically have a right to reside for the purpose of passing the habitual residence test and accessing benefits such as Universal Credit or

7 DWP will consider work to be genuine and effective if someone can prove they've earned an average of more than £184 a week for at least three months. If someone earns less than this then the DWP will consider the evidence provided and make an assessment based on a number of factors, including how much they earn, how many hours they work and how regularly they work.

8 Butler, P. and Rankin, J. (2019) Surge in EU citizens unfairly refused access to universal credit, *The Guardian*, 5th August. <https://www.theguardian.com/society/2019/aug/05/surge-in-eu-citizens-unfairly-refused-access-to-universal-credit>; Parkes, H. and Morris, M. (2020) Testing times: Universal credit and the habitual residence test. London: IPPR

9 Felja, D. and Greason, L. (2016) *Rough sleeping Roma in the City of Westminster*. Roma Support Group and St Mungo's

10 House of Commons Women and Equalities Committee (2019) *Tackling inequalities faced by Gypsy, Roma and Traveller communities, Seventh Report of Session 2017-19*. <https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/360/360.pdf>

11 Morgan, B. (2021) *Still here: Defending the rights of homeless EU citizens after Brexit and Covid-19*. London: Public Interest Law Centre

statutory homelessness assistance. In contrast, those who have been living in the UK for less than five years will usually only be eligible for pre-settled status, which effectively provides limited leave to remain for five years. People with pre-settled status will still need to demonstrate that they have a qualifying right to reside to access to benefits (pending the outcome of the Fratila case¹²).

The deadline for applications to the EU Settlement Scheme was 30 June 2021. Although the application process for the scheme is relatively simple in comparison to most immigration applications, people experiencing homelessness have still faced multiple barriers to successfully applying. Crisis services have been working with partner organisations to support people with experience of homelessness to apply to the Settlement Scheme since it opened in April 2019. Many of the clients we have worked with had very little knowledge of the scheme, and those that were aware often assumed that they wouldn't be eligible because of their homelessness, poor health or unemployment. People experiencing homelessness also often find it difficult to provide the proof of identity and evidence of their residence in the UK that is needed to support their application.¹³

The Home Office reported that more than six million applications were made to the EU Settlement Scheme before the 30 June deadline, and more than 5.1 million grants of status had been made.¹⁴ However, while these are significant numbers, evidence suggests that many people experiencing homelessness had not

managed to apply by the deadline or were still waiting for a decision on their application. Research commissioned by Crisis looking at homelessness amongst EU citizens living in Britain shows that in the three to six months before the June deadline around a quarter of those surveyed had not yet obtained settled or pre-settled status. This rises to around 40 per cent for those experiencing some of the worst forms of homelessness. The Home Office have said they will accept applications to the Settlement Scheme after the deadline where there are reasonable grounds for delay, however it is not yet clear how this guidance will be interpreted in practice and what evidence will be deemed sufficient.

People with pre-settled status are at risk of losing their permission to live in the UK in future if they do not successfully apply for settled status before their temporary leave expires. To qualify for settled status, people will need to demonstrate they have been residing in the UK continuously for five years. Where someone cannot provide sufficient evidence of this, they will not be granted settled status. EU citizens who are homeless or have experienced homelessness are at greater risk of being unable to secure settled status due to the additional difficulties they are likely to face providing this evidence. They will then face a choice between leaving the UK or remaining here unlawfully, and being unable to work, rent property or access benefits and housing assistance. To ensure that people are not left stuck in a situation where they are unable to extend their leave because they don't have the required evidence, we recommend that the Government considers reducing the

evidence requirements for converting pre-settled status to settled status. Putting in place a package of proactive support to ensure people can get the documentation they need would also help to reduce the risk of people losing their permission to remain in the UK. This will help to ensure that people facing housing difficulties or experiencing other vulnerabilities are not pushed into homelessness when their pre-settled status expires.

Having access to good quality OISC accredited immigration advice will be crucial both for EU citizens who need support to convert their pre-settled status to settled status, and for those who need to make a late application. The difficulties people face accessing immigration advice and the lack of capacity in the sector are well-evidenced. An inability to access legal advice was cited by migrant and homelessness organisations participating in Crisis' research into migrant homelessness in Britain as being one of the most significant barriers to supporting people out of homelessness.¹⁵ Research looking at the demand and supply of immigration legal advice in London found that demand far outstrips supply for legal advice work. Getting support with casework was a particular challenge. Many organisations offer one off advice sessions but far fewer offer casework to assist directly with making an application or gathering supporting evidence. Language was also found to be a significant barrier to accessing the advice network. Most non-legal aid organisations do not have the funds to offer interpretation and this leads to people paying for non-specialist advice in their own language when they are unable to find free specialist advice either in their own language or via an interpreter.¹⁶

It is critical that this severe shortage of independent immigration advice is addressed so that people experiencing homelessness can access specialist advice and advocacy to help them resolve issues with their immigration status and move out of homelessness.

Hostile environment and new Immigration Rules

EU citizens who do not successfully secure status through the EU Settlement Scheme, or through another route for those arriving from 1 January 2021, will lose their permission to be in the UK and will be subject to the Government's 'hostile environment'¹⁷ policies. Hostile environment measures (now referred to as the compliant environment) aim to make it more difficult for people who do not have legal permission to remain in the UK to access work, housing, health care and financial services. A central part of these measures is an increase in secondary immigration control. This makes private citizens and public bodies – including banks, landlords and the NHS – responsible for immigration enforcement. In England, the Right to Rent scheme is a key example of this. The scheme requires private landlords and letting agents in England to check that tenants have a right to rent. If they rent their property to someone who does not have the right to rent, they will face criminal charges and may get an unlimited fine or a prison sentence.

This approach to tackling irregular immigration can be both a cause of homelessness and make it harder to end homelessness for people who are not originally from the UK. While the hostile environment is aimed at people without valid leave to be in

12 CPAG brought judicial review proceedings on behalf of two EU nationals, a severely disabled man and his carer, who were refused universal credit on the basis that their pre-settled status was not a qualifying right of residence for the purposes of means-tested benefits. The claimants are contesting this on the basis that it constitutes unlawful discrimination against them based on their nationality. The case is soon expected to be heard by the Supreme Court and there is a current stay on benefit applications made before the end of the transition period which relied on pre-settled status as the basis of their claim.

13 Boobis, S., Jacob, R., and Sanders, B. (2019) *A Home For All: Understanding Migrant Homelessness in Great Britain*. London: Crisis

14 Home Office (2021) *EU Settlement Scheme quarterly statistics, June 2021*

15 Boobis, S., Jacob, R., and Sanders, B. (2019) *A Home For All: Understanding Migrant Homelessness in Great Britain*. London: Crisis

16 Wilding, J., Mguni, M. and Van Isacker, T. (2021) *A Huge Gulf: Demand and Supply for Immigration Legal Advice in London*. London: Justice Together

17 Since early 2018, the Government have stopped using the term 'hostile environment' and now refer to this set of policies as the 'compliant environment'.

the UK, there are regular reports of people with a lawful right to be here being caught up in the system.¹⁸ The Windrush scandal is a prime example of this, but people from outside this group are also being affected, including UK and EU citizens.

Changes to the Immigration Rules published in October 2020 are the most recent example of how these policies directly impact people experiencing homelessness. The new rules make sleeping rough grounds for refusing or cancelling an individual's permission to stay in the UK. Guidance published in April 2021 outlines that the rules should only be applied in cases where someone has refused or disengaged with support and is engaged in persistent anti-social behaviour or other criminal activity. Although EU citizens who have secured status through the EU Settlement Scheme will be exempt from these rules, those who have not applied to the scheme or who do not manage to secure settled status when their pre-settled status expires will be vulnerable to removal under the policy.

These rules may make non-UK nationals in vulnerable circumstances fearful of asking for the support they need to get off the streets. They put people at risk of exploitative work, accommodation, and potentially modern slavery, to avoid sleeping rough and putting themselves at threat of removal from the country. The policy has been met with widespread opposition from the homelessness sector, and more than 100 charities, eight local authorities and the Mayor of London have said they will refuse to comply with the policy.¹⁹

People sleeping rough experience the most extreme and visible form of homelessness, facing a greater risk of violence, abuse, and earlier death compared to the general public. Evidence shows that linking enforcement action with rough sleeping can have the unintended consequence of pushing people further from the support needed to end homelessness.²⁰ Instead, a more effective approach is one that focuses on tackling the root causes of people's homelessness and helping people to move on into safe and stable accommodation. We strongly recommend that the Westminster Government scraps these damaging new rules immediately to ensure everyone can access homelessness support without fear.

EU citizens' homelessness in Britain

While it is clear that a significant number of EU citizens do experience homelessness in Britain, there are big gaps in the data that is collected and published in relation to this so up until now it has been difficult to make an accurate estimate of the scale of the issue.

The most detailed data available is for the numbers of EU citizens who are sleeping rough in London. There are also some indications of scale and trends from other data sources, including national rough sleeping counts and statutory homelessness statistics, which give a sense of the national picture in England, Scotland and Wales.

The Combined Homelessness and Information Network (CHAIN) gives a detailed view of the number of people rough sleeping in London and includes all people encountered by outreach workers regardless of immigration status. In 2020/21, 29 per cent of people seen sleeping rough in the year were EU or EEA citizens, with the majority being from Central or Eastern Europe. The proportion of people sleeping rough from Central and Eastern European countries decreased markedly in 2020/21 in comparison to previous years. In 2020/21, 22 per cent of people sleeping rough in London were from Central or Eastern Europe, compared to 30 per cent in 2019/20 and 31 per cent in 2018/19.²¹

The number of EU citizens recorded in the national rough sleeping snapshot for England also decreased as a proportion of all rough sleepers in 2020, from 22 per cent in 2019 to 18 per cent in 2020. This national snapshot provides an indication of the number of people sleeping rough at a point in time in the year and is based on a combination of evidence-based local authority estimates and rough sleeper counts.²²

Data on the nationality of households who are homeless and accessing local authority statutory homelessness assistance is generally poor across the UK nations. Statutory data for England shows that in 2020/21, five per cent of the 268,560 households assessed and owed a prevention or relief duty by their local authority were EU citizens, with this proportion being higher in London at nine per cent.²³ This does not include people who are not entitled to assistance or people who do not approach their local authority for help so is likely to be an underestimate of the total number of EU citizens who experienced homelessness in England

across this period. In Scotland and Wales, homelessness data collected by the devolved governments does not capture the nationality of households.

Government responses to homelessness amongst EU citizens in England, Scotland and Wales

Before the Covid-19 pandemic, national governments in England, Scotland and Wales had begun to consider solutions to homelessness amongst non-UK nationals, primarily as part of wider strategies to reduce and end rough sleeping. Although immigration is a reserved policy area, responsibility for homelessness is devolved to the Scottish and Welsh governments so they have some capacity to address homelessness amongst non-UK nationals despite not having power over immigration policy.

In England, the Conservative Government of 2017 was elected with a manifesto commitment to halve rough sleeping over the course of the Parliament and end it altogether by 2027. The commitment to ending rough sleeping was reiterated in the Conservative Party's 2019 manifesto, but with a reduced timeline of delivering this within that parliamentary term. This meant the new target for the Government was to end rough sleeping by 2024.

Following the 2017 election, the Government launched a Rough Sleeping and Homelessness Reduction Ministerial Taskforce to develop a cross-government strategy to work towards this commitment. A Rough Sleeping Advisory Panel was also established, made up of homelessness experts, charity representatives, and local government, to advise the ministerial taskforce.

18 House of Commons Home Affairs Committee (2018) *Immigration policy: basis for building consensus. Second Report of Session 2017-19*. <https://publications.parliament.uk/pa/cm201719/cmselect/>

19 Bulman, M. (2021) More than 100 councils and charities vow to boycott Home Office policy to deport rough sleepers, *The Independent*, 8th August. <https://www.independent.co.uk/news/uk/home-news/councils-charities-rough-sleeping-deportation-home-office-b1898240.html>

20 Johnsen, S. and Fitzpatrick, S. (2007) *The impact of enforcement on street users in England*, York: Joseph Rowntree Foundation. Sanders, B. and Albanese, F. (2017) *An examination of the scale and impact of enforcement interventions on street homeless people in England and Wales*, London: Crisis

21 Greater London Authority (2021) *CHAIN annual report: Greater London 2020/21*

22 MHCLG (2021) *Rough sleeping snapshot in England: autumn 2020*

23 MHCLG (2020) *Statutory homelessness in England: financial year 2019-20, official statistics*

In August 2018, the Government published a Rough Sleeping Strategy for England, which included £5 million of new funding to support non-UK nationals who sleep rough, and a £45 million Rough Sleeping Initiative, which also funded some projects specifically focused on supporting non-UK nationals.²⁴ Additional funding to support people sleeping rough was also made available in some local areas for winter 2019/20 through the Cold Weather Fund. As part of this the Government temporarily lifted restrictions on the provision local authorities could provide for EU citizens sleeping rough in Greater London, Luton, Bedford and Milton Keynes. This allowed local authorities in these areas to provide up to three months of emergency accommodation and floating support to EU citizens who would not otherwise have been eligible, but it did not enable people to access statutory homelessness services or welfare benefits. This initially applied for six months but was later extended until December 2020 and applied nationally. In addition, the Home Office have also provided funding to support vulnerable groups to apply to the EU Settlement Scheme, which included support for organisations working with people experiencing homelessness.

In Scotland, the Government have demonstrated a commitment to tackling the issues causing non-UK nationals to experience homelessness. The Scottish Government published a comprehensive plan, 'Ending Homelessness Together', in November 2018, which set out how national government, local government and third sector partners would work together to achieve their shared ambition to end homelessness. The

action plan includes a commitment to continue pressing the Westminster Government to address issues relating to migrant homelessness to ensure that no one sleeps rough or becomes homeless due to their migration or social security status. The plan also sets out the Scottish Government's intention to continue exploring what measures they can put in place to prevent rough sleeping and homelessness for those without recourse to public funds.²⁵ This is explored further in the Scottish Government's ending destitution strategy, which was published in March 2021, and sets out how they are planning to improve the support available for people with no recourse to public funds living in Scotland.²⁶ This includes EU citizens who do not have status under the EU Settlement Scheme and EU citizens with pre-settled status.

The Welsh Government have also demonstrated a commitment to supporting people with no recourse to public funds who are experiencing or at risk of homelessness. In June 2019, the Welsh Government put together a Homelessness Action Group to consider the actions and solutions required to achieve the goal of ending homelessness. The Action Group published their final report in July 2020, which focuses on the medium and longer-term actions needed to end homelessness in Wales and includes recommendations around supporting people with no recourse to public funds.²⁷ The Welsh Government have accepted in principle the Action Group's recommendations and agreed to develop a plan to achieve this.

As part of their commitment to be a Nation of Sanctuary for asylum seekers

24 Ministry of Housing, Communities and Local Government (2018) *Rough Sleeping Strategy*.

<https://www.gov.uk/government/publications/the-rough-sleeping-strategy>

25 Scottish Government (2018) *Ending homelessness and rough sleeping: action plan*.

<https://www.gov.scot/publications/ending-homelessness-together-high-level-action-plan/pages/9/>

26 Scottish Government (2021) *Ending destitution together: strategy*.

<https://www.gov.scot/publications/ending-destitution-together/>

27 Homelessness Action Group (2020) *Homelessness Action Group: report July 2020*.

<https://gov.wales/homelessness-action-group-report-july-2020>

and refugees, the Welsh Government have also been looking at ways to improve the accommodation options for destitute refused asylum seekers. This included commissioning a feasibility study to look at what could be achieved within the Government's devolved powers.²⁸ The findings of this research were published in August 2020 and the recommendations will be a key element of the approach to supporting non-UK nationals in emergency accommodation who do not have recourse to public funds.

Impact of the Covid-19 pandemic and Government responses

When the Covid-19 pandemic hit in March 2020, national governments in England, Scotland and Wales acted quickly to both protect people already experiencing homelessness and to support people to keep their homes. People experiencing homelessness, particularly those who are sleeping rough, are extremely vulnerable to severe health outcomes and mortality from Covid-19. Not only do they not have a safe home to self-isolate in or follow sanitation guidance, but people experiencing homelessness are also three times more likely to experience a chronic health problem including respiratory conditions.²⁹ In addition, a recent study found that among a sample of homeless hostel residents in London, the levels of frailty were comparable to 89-year-olds in the general population. Participants had an average of seven long-term health conditions, far higher than people in their 90s.³⁰

28 Welsh Government (2020) *Accommodation for refused asylum seekers feasibility study*.

<https://gov.wales/accommodation-refused-asylum-seekers-feasibility-study>

29 Lewer, D., et al (2019) *Health related quality of life and prevalence of six chronic diseases in homeless and housed people; a cross-sectional study in London and Birmingham, England*

30 Rogans-Watson, R. et al. (2020) *Premature frailty, geriatric conditions and multimorbidity among people experiencing homelessness: a cross-sectional observational study in a London hostel*.

31 Local Government Association (2020) *Lessons learnt from council's response to rough sleeping during the Covid-19 pandemic*

32 MHCLG (2021) *Coronavirus (COVID-19) emergency accommodation survey data: January 2021*

One of the most significant steps taken in response to the pandemic has been the Everyone In initiative in England, and parallel efforts by Scottish and Welsh Governments and their partners. At the onset of the first lockdown in March 2020, national governments instructed local authorities to accommodate all people sleeping rough or living in accommodation where they couldn't self-isolate into emergency accommodation where they would have their own room with washing facilities. This meant people could access support regardless of the usual homelessness tests such as priority need, local connection, and eligibility that can result in people sleeping rough or experiencing other forms of homelessness being turned away from support. This was especially significant for non-UK nationals sleeping rough or in unsafe accommodation as they are not ordinarily entitled to receive public funding or support.

In England, in just three months 14,600 people were safely accommodated through this extraordinary effort from local authorities and partner agencies, including health services, criminal justice, the voluntary and charitable sector, and housing associations.³¹ Even more incredibly, as the pandemic lasted and many councils continued this approach, by January 2021 a reported 37,000 people had been supported out of rough sleeping and other precarious living situations into safe emergency accommodation.³² In Wales, between March 2020 and June 2021 more than 12,400 people experiencing homelessness had been provided with accommodation and support as part

of the Welsh Government's response to the pandemic.³³ In Scotland, the number of people accommodated was smaller as more people already had a legal entitlement to accommodation due to the abolition of the priority need test in 2012. The immediate response focused on moving people out of communal night shelter accommodation and accommodating people sleeping rough who were not eligible for statutory support.³⁴

While the overall Everyone In effort produced remarkable results, there remained gaps in support. A lack of clarity over the continuation of the Everyone In initiative in England hampered the ability of local authorities to end people's homelessness, especially for non-UK nationals with restrictions on the statutory support they can access. Following the initial strong message that everyone should be supported in response to the public health emergency, in May 2020 the Westminster Government wrote to English local authorities with a reminder that that many people not born in the UK have no recourse to public funds conditions attached to their immigration status, preventing them from accessing homelessness assistance. In a letter from the then Minister for Rough Sleeping and Housing, it was made clear that exceptions to offer support to people with these conditions should only be made if there was a risk to life.³⁵ However, no guidance was published on what risk to life constituted, and in the same month the Government had published plans to ease lockdown measures suggesting the risks of

Covid-19 were lessening. The resultant effect was that in some areas, local authorities began reinstating eligibility restrictions and no longer continued supporting people with no recourse to public funds.

This also made it difficult for local authorities who had supported people with no recourse into emergency accommodation. This included EU citizens who have restricted access to benefits and homelessness support because they have pre-settled status or have not yet secured status through the EU Settlement Scheme, as well as non-UK nationals who have a no recourse to public funds condition attached to their immigration status. This group had (and continue to have) little to no move on options as they cannot access public funds, and the economic impact of the pandemic has made it more difficult for people to find employment. This has left people stuck in limbo in emergency accommodation, and for some people, at risk of returning to the streets.

As of January 2021, more than 11,000 people supported through the Everyone In initiative in England remained in emergency accommodation, many of which are thought to have no recourse to public funds conditions attached to their immigration status.³⁶ The National Audit Office's report into the Government's response to the pandemic noted that local authorities in London and the West Midlands faced practical and financial difficulties supporting people with no recourse, with around 50 per cent of people staying in hotels in London recorded

33 Welsh Government (2021) *Ending homelessness: A high level action plan – 2021-2026*. Note that this represents the total number of people supported into temporary accommodation during the pandemic in Wales, not just those who had previously been rough sleeping.

34 Watts, B., Bramley, G., Fitzpatrick, S., Pawson, H. & Young, G. (2021) *The Homelessness Monitor: Scotland 2021*. London: Crisis

35 Letter from Luke Hall MP, Minister for Rough Sleeping and Housing, to all local authority chief executives in England, 28 May 2020: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/928977/Letter_from_Luke_Hall_MP_Minister_for_Rough_Sleeping_and_Housing_to_LA_Chief_Execs.pdf

36 MHCLG (2021) *Coronavirus (COVID-19) emergency accommodation survey data: January 2021*

as having no recourse to public funds at the beginning of winter 2020/21.³⁷

Research from Shelter found that in February 2021 almost one in four (23%) of those still in emergency accommodation in England were ineligible for homelessness assistance because of their immigration status. This compares to 10 per cent of all people accommodated since March 2020, suggesting that people who have no recourse to public funds are disproportionately more likely to still be in emergency accommodation as a result of facing additional barriers to moving out of homelessness.³⁸ This includes EU citizens who have restrictions on their access to benefits, either because they have not yet secured status through the EU Settlement Scheme or because they have pre-settled status.

There are very few move on options available for non-UK nationals who do not have access to statutory support and this leaves people at risk of returning to or remaining on the streets. It is clear that the needs of people in this situation are not currently being met, and a new approach is needed if this Government is to successfully tackle homelessness and rough sleeping.

In Wales and Scotland, local authorities are also facing challenges to successfully supporting people with no recourse to public funds, including EU citizens with restricted access to benefits, to move out of emergency accommodation and into long-term housing. Communications from Welsh and Scottish Governments have been clearer that they should continue to support everyone who was accommodated during the pandemic to ensure no one returns to rough sleeping. However, it is not clear how

37 National Audit Office (2021) Investigation into the housing of rough sleepers during the COVID-19 pandemic. <https://www.nao.org.uk/wp-content/uploads/2021/01/Investigation-into-the-housing-of-rough-sleepers-during-the-COVID-19-pandemic.pdf>

38 Garvie, D. et al (2021) *Everyone In: Where Are They Now?* London: Shelter

long this will be able to continue for, as funding for this accommodation is being provided as part of the response to the Covid-19 pandemic and the usual UK legal restrictions on housing assistance can only be bypassed for the duration of the pandemic.

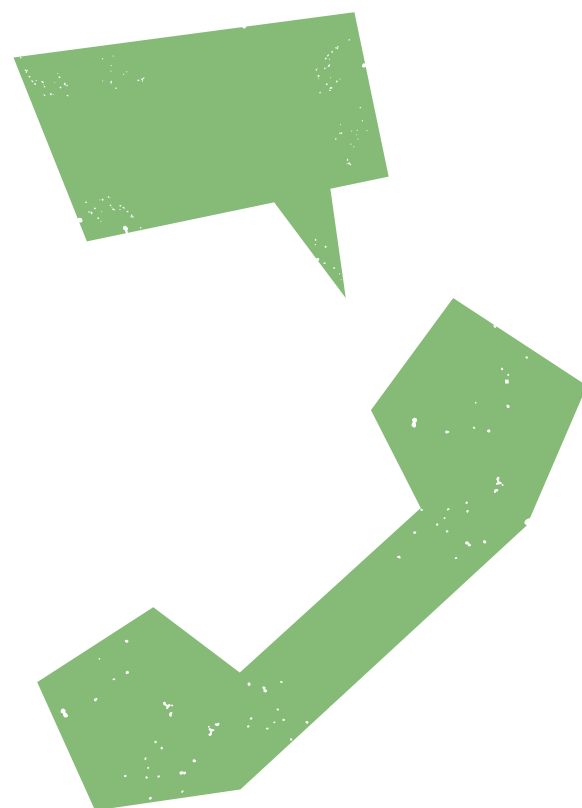
The Welsh Government's Phase 2 approach aims to make sure people are helped to move on to more permanent accommodation and is backed by £50 million of revenue and capital funding, with each local authority able to bid for funding to support the transition to rapid rehousing approaches to homelessness. The Welsh Minister for Housing and Local Government has confirmed that local authorities continue to be funded to provide emergency accommodation to people with no recourse to public funds and the Welsh Government is also working with partners on hosting schemes for the same group. The Welsh Government is also funding support for people with a chance of securing their immigration status and, in the run up to the EU Settlement Scheme deadline, worked with partners to deliver training to local authority staff on migrant rights and entitlements. The Welsh Government has acknowledged, however, that alternative legal powers used during the pandemic to provide greater support are time-limited and that UK-wide restrictions on support are due to resume after the pandemic.

In Scotland, the emergency accommodation funding and response was explicitly inclusive of people with no recourse to public funds, with guidance from COSLA and emergency legislation seeking to ensure that non-UK nationals had access to support and healthcare during the pandemic. In September 2020, the

Scottish Government updated their Ending Homelessness Together Action Plan and reiterated their commitment to supporting people who have no recourse to public funds. This has included providing further funding to organisations supporting people who have restricted access to statutory support to prevent destitution.

The Scottish Government have also supported the work of the Everyone Home collective, a partnership of third sector and academic organisations that are working together to mitigate the impacts of the pandemic on people at risk of or experiencing homelessness. The group have produced a route map looking at what action is needed to develop a pathway to safe accommodation and support for people who are destitute with no recourse to public funds, including EU citizens who are seeking settled status in Scotland and do not yet have entitlements to benefits.³⁹ This route map was endorsed by the Scottish Government and COSLA and a delivery plan for achieving the ambition of designing out destitution in Scotland, 'Fair Way Forward', was published in October 2021.⁴⁰ This sets out new ways of working collectively to assist people who do not have statutory entitlements to make sure that no one is left destitute because of their immigration status.

Extending eligibility to benefits and to statutory homelessness assistance for EU citizens with pre-settled status who are homeless or at risk of homelessness would go some way to addressing these challenges and make it significantly easier for local authorities across Britain to support EU citizens out of rough sleeping and emergency accommodation and into permanent, safe and stable homes. This would also help to address the drivers that push EU citizens into homelessness in the first place, by providing a vital safety net to ensure a temporary loss of income doesn't cause someone to lose their home.



³⁹ Everyone Home collective (2020) *Scotland's Ambition to End Destitution and Protect Human Rights*. <https://everyonehome.scot/pdf/route-map-2.pdf>

⁴⁰ Everyone Home collective (2021) *Fair Way Scotland*. <https://homelessnetwork.scot/wp-content/uploads/2021/10/Fair-Way-Scotland-Delivery-Plan-FINAL-051021.pdf>



EU research findings: Scale and demographics

Crisis commissioned Heriot-Watt University and IPPR⁴¹ to conduct research exploring the scale and experiences of homelessness among EU citizens living in Britain. The research aimed to reach an estimate of the current scale of homelessness among EU nationals across England, Scotland and Wales, broken down by Crisis' core homelessness definition⁴², and to understand the causes and impacts of homelessness for this group. All research findings in the next two sections are taken from this report.

It builds on existing evidence on homelessness and housing precarity among EU citizens and is the first of its kind to comprehensively estimate the scale of homelessness among this group. The research was originally commissioned in late 2019 and was intended to be a one-year project. However, the onset of the Covid-19

pandemic and lockdown restrictions in March 2020 led to the postponement of the fieldwork and a redesign of the approach to conducting the survey and interviews. The fieldwork took place six to nine months later than originally planned, and was primarily conducted between January and June 2021.

41 Full research report – Bramley, G., Morris, M., Mort, L., Netto, G., Rankin, L., Sosenko, F. and Webb, J. (2021) *The scale, causes and impacts of homelessness among EEA citizens*. Heriot-Watt University and IPPR.

42 See Bramley (2017) *Homelessness projections: Core homelessness in Great Britain*, London: Crisis. https://www.crisis.org.uk/media/237582/crisis_homelessness_projections_2017.pdf and Fitzpatrick et al (2021), *The Homelessness Monitor: England 2021*, ch.5 www.crisis.org.uk

Core homelessness estimates

Core homelessness captures some of the most severe and immediate forms of homelessness, including people: sleeping rough; staying in places not intended as residential accommodation, such as cars, tents, boats and sheds; living in homeless hostels, refuges and shelters; placed in unsuitable temporary accommodation, such as B&Bs, hotels and out of area placements; and sofa surfing. The research findings presented here all refer to this definition of homelessness unless otherwise stated.

This research provides estimates of the scale of homelessness among EU citizens, primarily looking at the period immediately preceding the Covid-19 pandemic, while also providing indications of how these numbers may have changed during the ongoing pandemic and associated lockdowns. In total, an estimated 22,000 EU national households were experiencing homelessness at a point in time in the 2019 period. This is around nine per cent of the total number of people estimated to be experiencing homelessness at this time.

Figure 1 below shows the types of homelessness people were experiencing. Around a tenth were rough sleeping, and a smaller proportion were living in unconventional forms of accommodation, such as cars, tents or sheds, or in unsuitable temporary accommodation, including B&Bs and other nightly paid, non-self-contained accommodation. Around 20 per cent were staying in hostels, refuges or shelters, and the largest number (around 60%) were sofa surfing, meaning they were staying temporarily with other households without their own bedroom.

Figure 2 shows what proportion of households experiencing homelessness in each category were EU citizens, using the estimated national totals for the same period. EU nationals are estimated to make up around five per cent of the total British population and, as the chart shows, the proportion of EU nationals experiencing any form of homelessness is significantly above this benchmark. This demonstrates that the risk of experiencing some of the worst forms of homelessness for EU

Figure 1 – Number of core homeless EU nationals in Great Britain by category, c.2019

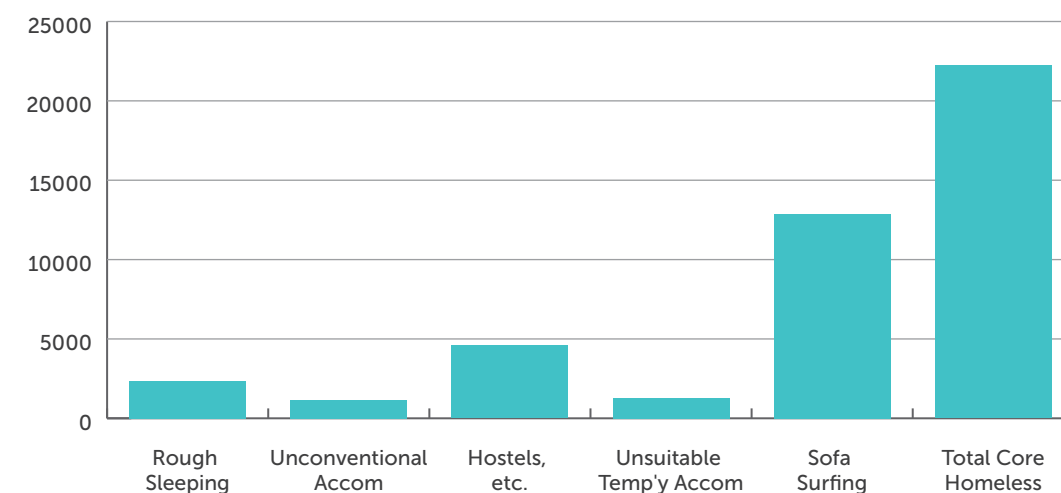
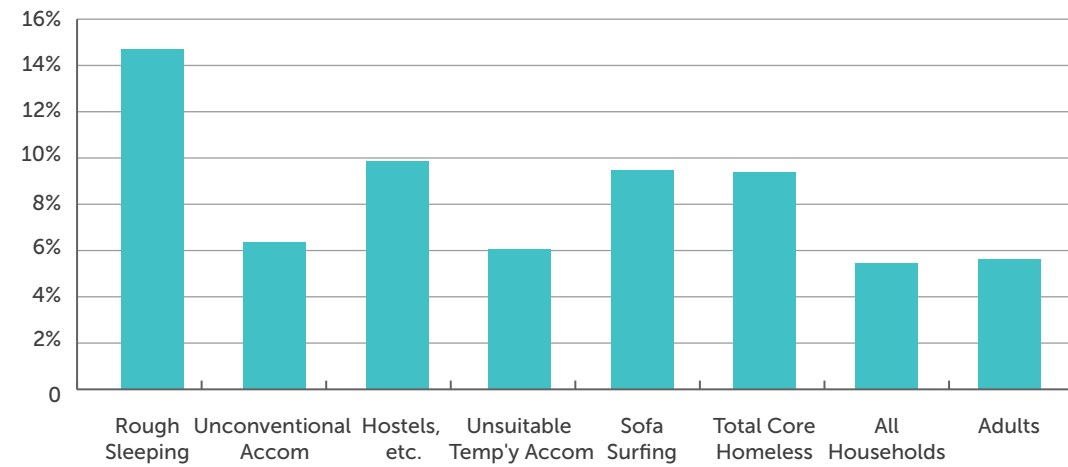


Figure 2 – Share of core homeless in each category and of total households or adult population who were born in the European Economic Area (EEA), percent c.2019



nationals in Britain is virtually double (1.7 times) the risk for the population as a whole. The risk is even higher for rough sleeping, with EU nationals estimated to be over 15 per cent of the total number of people rough sleeping across Britain. This suggests that the risk of EU nationals experiencing rough sleeping in Britain is almost three times the risk for the general population.

These numbers may still be an underestimate, due to the likelihood of data sources under-recording EU nationals in housing difficulty because of language barriers. Many of the household surveys used to reach these estimates do not offer the option for people to complete them in another language if required. Statutory data sources are also likely to exclude households who are not eligible for assistance, meaning a significant proportion of more recent EU migrants or those who aren't in employment will not be recorded in these data sources.

The number of EU nationals experiencing homelessness is likely to have changed over the period of the Covid-19 pandemic and revised estimates have been made to take account of this. Table 1 presents estimates of the approximate scale of these numbers, based on the limited information available. This takes account of the country-specific estimates and projections of homelessness by homeless category over the relevant years. It shows a slight decrease in 2020 with levels increasing again in 2021. This still shows similar patterns and risk of homelessness compared to UK nationals.

Table 1 – Estimated numbers of EU nationals experiencing core homelessness during the pandemic period

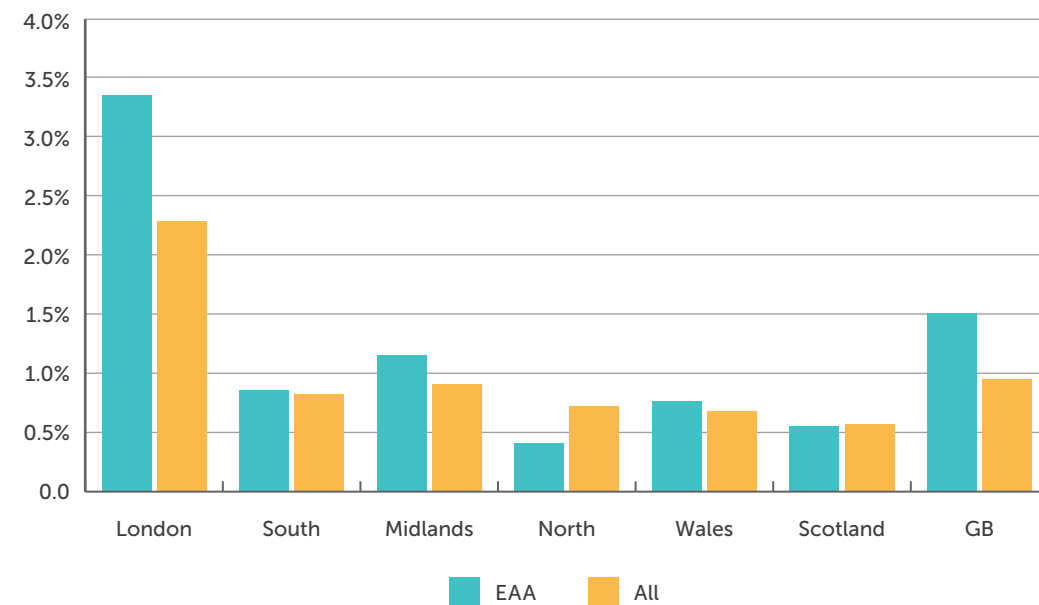
	2020	2021
Rough sleeping	1,300	3,190
Unconventional accommodation	1,060	1,020
Hostels	4,460	5,000
Unsuitable Temporary Accommodation	1,040	800
Sofa Surfing	9,840	10,570
Total	17,700	20,580

Geography of EU nationals experiencing homelessness

The research provides estimates of the numbers of EU nationals experiencing homelessness across four broad regions of England, as well as Wales and Scotland. This is illustrated in figures 3 and 4 below, which show a strong concentration of EU nationals experiencing homelessness in London. The rate of homelessness among EU nationals is above the overall rate in all regions except northern England, with a relatively small margin

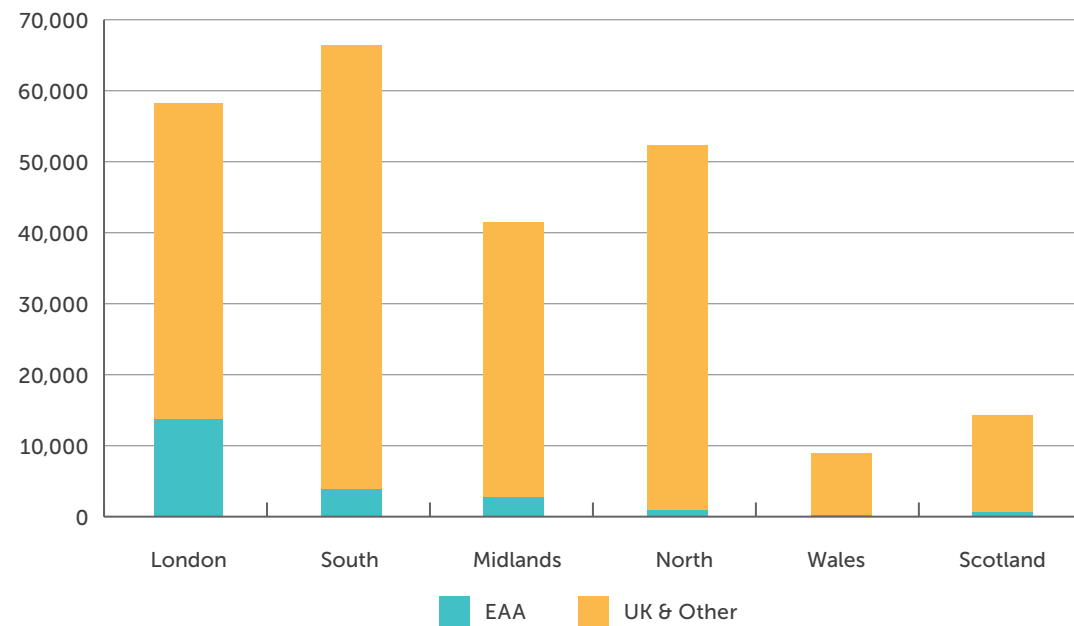
apparent in Scotland⁴³. The pattern partly reflects the geography of EU migration in England since 2004, with a stronger concentration in London and the Eastern part of the country including the East Midlands. This in turn reflects geographical proximity, labour market opportunities, including in sectors like agriculture as well as hospitality and other services, and (in the case of London) housing market pressure. These patterns are supported by statutory homelessness data for England, national rough sleeper count estimates and CHAIN data in London.

Figure 3 – Core homelessness rates for EU nationals and all households by broad region and country, percent of households in 2019/20⁴⁴



⁴³ Data sources with viable sample numbers to estimate the exact rate in Wales are not available.
⁴⁴ Sources: estimated from core homelessness estimates in Fitzpatrick et al (2021 and forthcoming), Destitution in the UK 2019 survey, English Housing Survey, Scottish Housing Survey, Labour Force Survey and HCLIC case data in England

Figure 4 – Core homelessness numbers for EU nationals and other households by broad region and country, households in 2019/20



Socio-demographic profiles of EU nationals experiencing homelessness

The targeted survey and the RDS survey⁴⁵ carried out for this research provide more detail about the gender, age, household type and current housing situation of EU citizens in Britain who have experienced housing difficulties or homelessness. Both surveys found that a high proportion of EU nationals experiencing rough sleeping and other forms of homelessness in Britain are male. Across both surveys men were more likely to report recent experiences of homelessness. This is consistent with other evidence in showing a high proportion of rough sleeping in the EU population is experienced by men. In both surveys, female respondents were more likely to be recorded as experiencing statutory homelessness or as being at risk of other types of homelessness not captured by the core homelessness definition.

Those who were experiencing the most severe forms of homelessness were most likely to be in the 35-54 age group, with less young adults (under 25) than would be expected when compared with the national benchmark for this group. Those who had recently been rough sleeping were generally of a similar age profile to the wider homelessness group but there were a higher proportion of under 25s and less over 55s in this group.

Across both surveys, a high proportion of respondents were single person households or multi-adult groups. Lone parent families were overrepresented, whereas couples and couple families were strongly underrepresented. People who had recently experienced homelessness were more likely to be in multi-adult households or single person households, and this is also the case for those who had been rough sleeping in the last two years.

The research also asked about people's current housing situation. The majority of respondents did not have their own self-contained home, and this was even more likely to be the case for people who had previously experienced rough sleeping or other severe forms of homelessness. People reported a wide range of current living situations, including rough sleeping, sharing a house or flat, staying with relatives or friends, being in a

temporary house or flat provided by a local authority or support agency, or staying in a hostel, shelter, refuge or B&B. For those who had experience of homelessness, the most common form of current accommodation was a hostel or B&B, followed by sharing with other households and being in a temporary house or flat provided by a local authority or other support organisation.



⁴⁵ Full details of the methodology for the research and the design of the surveys is provided in appendix 1.



EU research findings: Causes of homelessness

The drivers of homelessness tend to be multifaceted and complex. Often, causes are interlinked and, while sometimes a single factor can drive someone into homelessness, usually the explanations involve a combination of structural factors (such as employment conditions and housing supply), individual and relational factors (such as relationship breakdown) and system failures (such as barriers to welfare support). Respondents to the surveys conducted for this research, especially those with housing difficulties, reported a range of adverse events over the previous year, in particular job loss, financial difficulty and health problems, with relationship or family breakdown and eviction also quite common. These issues were explored further through in-depth interviews, which provide greater insight about how they contributed to people's homelessness.

Drivers of homelessness: Structural factors

The employment conditions of EU citizens were often a contributing factor to their homelessness. These came in many forms – from sustained unemployment to insecure and exploitative work. In many cases, EU citizens found themselves working in the grey areas of the economy and as a result were more likely to face poor or exploitative working conditions.

The research looked at people's employment status both in the period before the Covid-19 pandemic and at the time the survey was completed to understand the impact of the pandemic on employment patterns among EU citizens experiencing homelessness or housing difficulties. The employment picture for those with recent experience of homelessness was very adverse in both cases. A third of those who had recently experienced rough sleeping and a quarter of

those who had recently experienced other forms of homelessness were unemployed in the pre-Covid period. Around a third were working, just under a fifth were unable to work due to disability or illness, and a smaller, but still significant proportion, were engaged in education or training. These patterns are very different from employment patterns for the overall new EU⁴⁶ working age population, where 81 per cent are working, five per cent are unemployed and very few are unable to work due to disability. This is shown in figure 5 below.⁴⁷

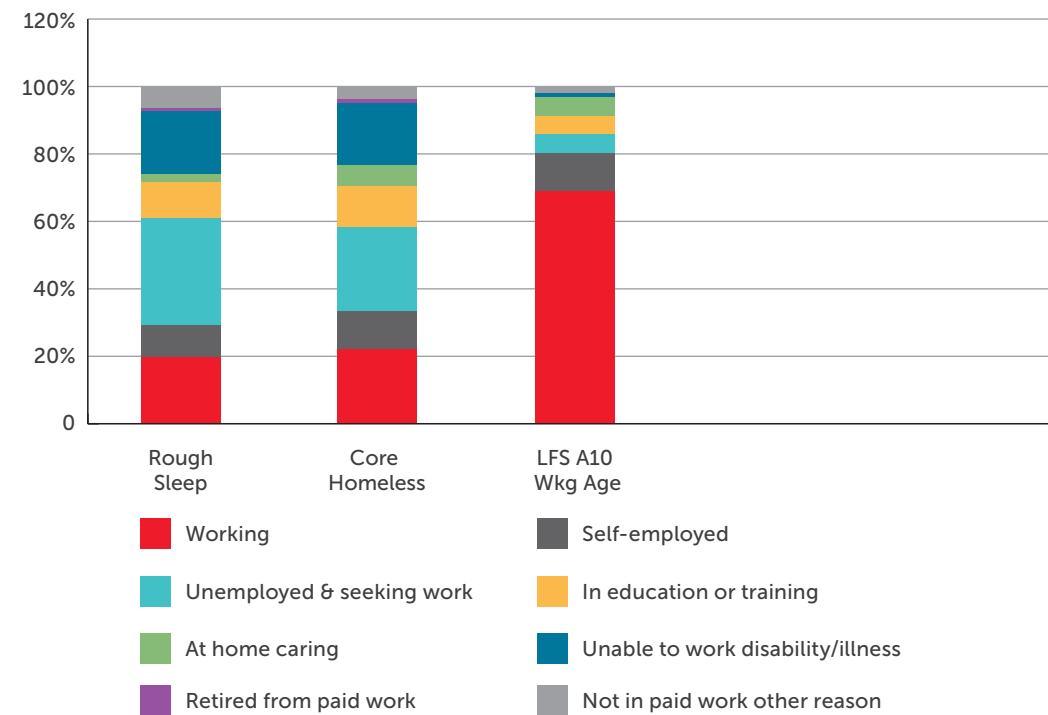
As expected, different patterns applied during the Covid-19 pandemic, with higher proportions of the survey sample unemployed at the time of the survey. These proportions rose to around 50 per cent for people who had recently experienced homelessness and 54 per cent for

people who had recently been rough sleeping. This suggests that the lockdown had a disproportionate impact on EU citizens and played a significant role in their housing difficulties, including rough sleeping.

While losing a job or struggling to find work was not the only factor that contributed to people's homelessness, many interviewees spoke about it as a catalyst which, when intersecting with other factors (such as relationship breakdown), made it extremely difficult to stay in their home. This is also reflected in the survey data. Just over half of people with recent experience of homelessness reported job loss as an adverse event that had affected them over the last year, closely followed by financial difficulties.

The research also sought to better understand the types of work that

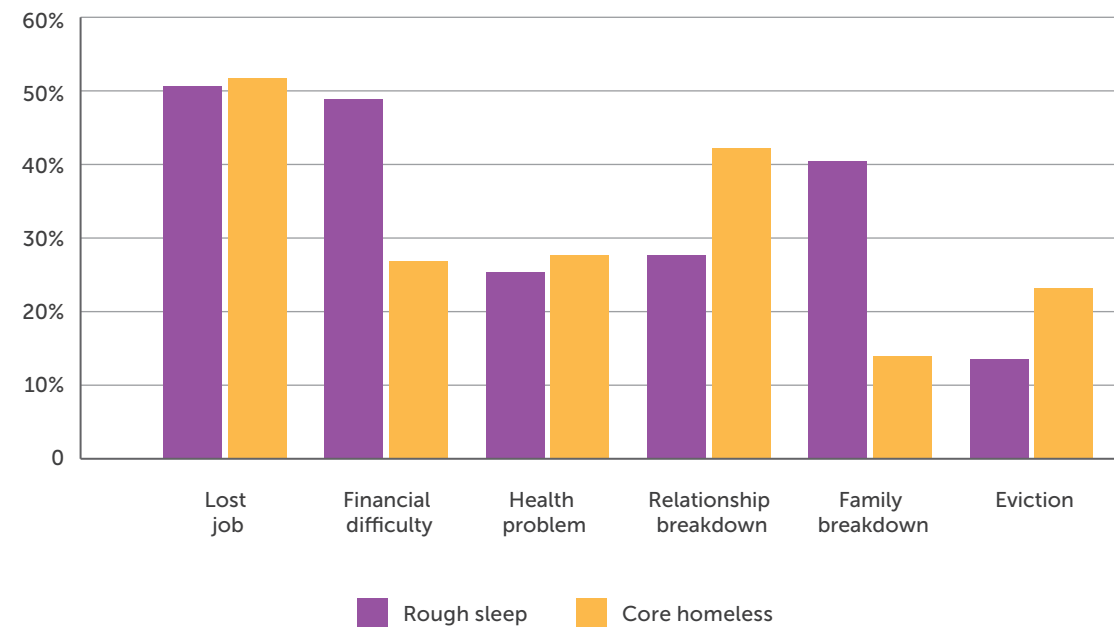
Figure 5 – Normal employment status of people who had been recently rough sleeping or core homeless (pre-Covid), with national population benchmark



46 'New EU' is used to describe citizens of the member states that joined the EU in 2004. Also sometimes referred to as the A10 countries, this includes: Cyprus, the Czech Republic, Estonia, Hungary, Latvia, Lithuania, Malta, Poland, Slovakia and Slovenia.

47 The data presented here focuses on the findings for respondents who had recent experience of rough sleeping or core homelessness. For data relating to all other respondents see the full research report: Bramley, G., Morris, M., Mort, L., Netto, G., Rankin, L., Sosenko, F. and Webb, J. (2021) *The scale, causes and impacts of homelessness among EEA citizens*. Heriot-Watt University and IPPR.

Figure 6 – Adverse events affecting recently rough sleeping or core homeless over last year (or since arriving in UK if more recent, percent)



people were doing. The survey responses show that despite often having higher or intermediate educational qualifications, many were employed in relatively lower-skilled occupations, including manual work (39%) and sales and service (13%). These types of roles are likely to have lower levels of pay and poorer job security and other work conditions. A significant proportion of respondents reported one or more of four common adverse conditions in their workplace, including not having a contract, experiencing abuse from their employer, no union representation and cash in hand payment.

These issues came through strongly in the in-depth interviews, with many people sharing their experiences of insecure and exploitative work. One interviewee spoke about how his journey into homelessness began with not being paid for his work. As a result, he couldn't afford to pay his rent and so when he ran out of savings he found himself homeless.

"The boss didn't pay me three and a half thousand pounds, and because of that I had a debt at the start, and I

was thrown out. I ran out of savings ... [The boss] didn't pay a lot of people." (Male, 35-44, Polish)

The interviews also highlighted problems for people who were previously living in tied accommodation that was linked to their job. One interviewee explained how this meant they faced exploitation from their employer which precipitated their homelessness.

"I worked for a person for seven months and that's where I slept, and received food. However, didn't get any money. I didn't get the money after seven months of work. So, that's why I was basically forced to live on the street... it was very hard." (Male, 45-54, Romanian)

The experiences of the people interviewed for this research suggested that finding legal and adequately paid work was often a significant challenge. One interviewee explained how he wanted to find legal work, but despite his search few places would take him on with a formal contract of employment. As a result, a number of participants spoke of how they had

been employed in casual work, which could lead to potential exploitation or problems with being paid on time. Moreover, the income from casual work was often not sufficient to avoid poverty and destitution.

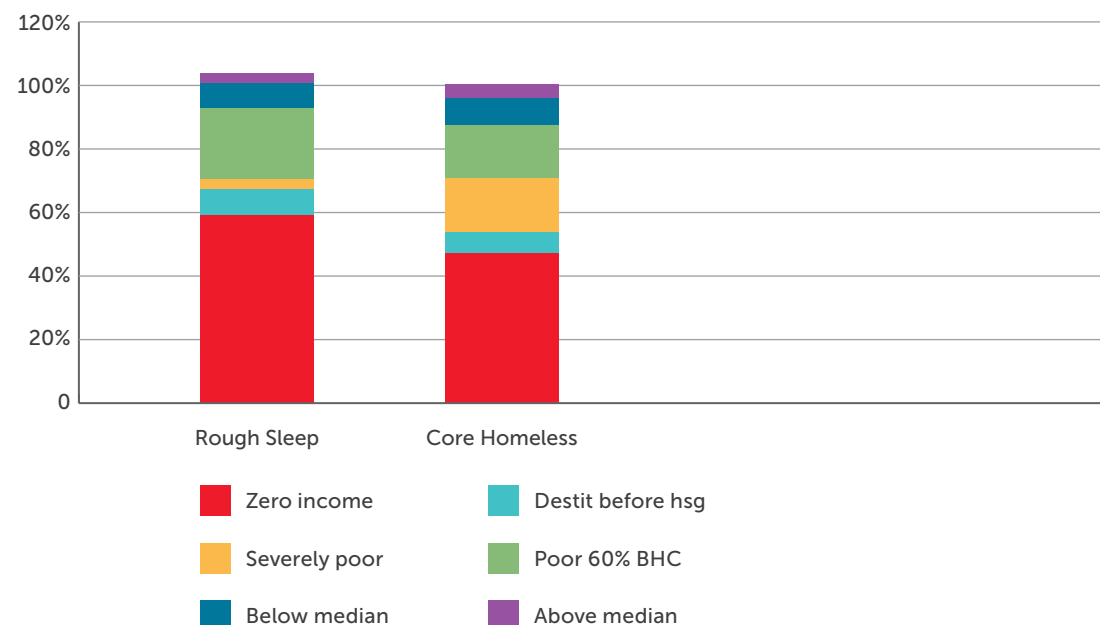
“Right now that I’m not working, I only sometimes go out to work and help my friend for a day. I spend my time in the hotel. To be honest, I don’t have money. I pick up cigarette butts and come to the hotel, have my dinner and rest. This is my routine.” (Male, 35-44, Polish)

This is reflected in the survey data, which found that many people had exceptionally low or non-existent income. This is illustrated in figure 7, which shows the incomes people with recent experience of rough sleeping or wider forms of homelessness were receiving in the period immediately before the Covid-19 pandemic.⁴⁸ For those with recent experience of homelessness, nearly half had no income, with only 13 per cent above the standard poverty line. For people who had recent experience of rough sleeping 59 per cent had zero income

before Covid-19, while another 13 per cent were destitute or severely poor, with only 11 per cent above the poverty line. This suggests that loss or lack of income, from work or benefits, has been a critical factor in the situation of EU nationals experiencing rough sleeping or wider forms of homelessness.

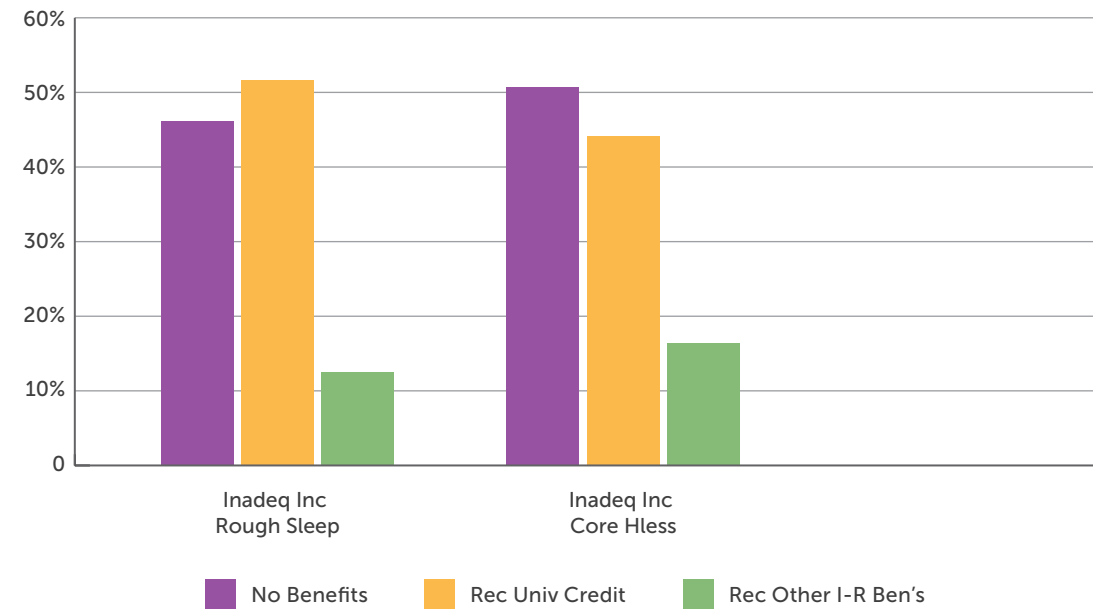
The survey also asked about the benefits that people were in receipt of. The responses show that nearly half (45%) of people who had recently been rough sleeping and over half of people who had recently experienced other forms of homelessness (51%) who were on clearly inadequate income were not receiving any benefits. The majority of those who were receiving benefits were getting Universal Credit, with a small proportion receiving other income-related benefits. This is illustrated in figure 8 below. This evidence suggests that lack of effective access to the benefit system, whether through formal rules excluding them or through problems of understanding and successfully navigating the system, is a major factor in both the

Figure 7 – Normal equivalised income bands of people recently rough sleeping or core homeless (pre-Covid)



⁴⁸ It should be noted that there was a high level of non-response to the income question in the Targeted Surveys, owing to the difficult circumstances of the interview.

Figure 8 – Whether receiving any benefits, Universal Credit or other income-related benefits by recent rough sleeping or core homeless status by whether income ‘adequate’



homelessness and the severe poverty experienced by EU nationals.

The interplay between low income and high housing costs was a frequent driver of homelessness among participants. Some participants highlighted how they had struggled to keep up with their rent payments in the private rental sector.

“The landlord stated that he couldn’t keep us if we couldn’t pay rent, you know. And that way in April, mid-April I found myself on the street.” (Male, 45-54, Polish)

Others highlighted how they had faced similar housing problems, including being forced out of accommodation due to debt, moving in with friends after being unable to pay the landlord, and becoming trapped in temporary council accommodation because other options were unaffordable. One participant described how hard they found it to get secure accommodation in the UK.

“Here, by themselves, nobody can afford to buy a house. First, they

need to pay something in advance, 2-3 months, and secondly you need documents, an employment contract, even if you have it you need a large amount of money. If I have 1400 pounds, they won’t even look at me ... And I believe that’s normal. Me, one person, if I work for 10 years in England, I can’t afford to buy a house.” (Male, 35-44, Romanian)

The Covid-19 pandemic compounded many of these issues and had a significant impact on participants. It not only made sustaining work harder, but it also highlighted other challenges in accessing housing and services. Many people were initially unable to work when businesses shut down at the beginning of the pandemic. After losing work as a result of the pandemic, many participants struggled to find help. Government backed schemes such as furlough were difficult to access and only a very small number of participants reported being able to access the scheme. For some participants, their loss of employment directly resulted in becoming homeless.

“Because of the virus, I ended up sleeping on the streets. The people who took me in took me from the streets, I was sleeping on the streets. I showed them, I had my employment contract, I had at least 11 payslips. I showed them, see, I work, I had 1780 pounds, I explained to them where I used to sleep, but since I’d been fired, I couldn’t afford it, and I ended up homeless” (Male, 35-44, Romanian)

It is clear that there are a number of interrelated structural factors that play a significant role in explaining EU citizens’ homelessness and housing difficulties. Many of the EU citizens interviewed for the research were subject to some of the worst conditions of the UK’s labour and housing markets, including low wages, long hours, high rents, and exploitation. The dramatic impacts of the Covid-19 pandemic on sectors such as construction and cleaning led to many falling into homelessness and destitution. Yet many of the underlying factors also relate to more long-standing challenges faced by the EU citizens participating in this research, including their employment in precarious and low-paid work without formal contracts or job security.

Drivers of homelessness: Individual and relational factors

Participants in the in-depth interviews described personal, and often traumatic, experiences that had affected them and caused their homelessness and housing difficulties. These were generally not seen to be the sole drivers of their homelessness, but as contributing factors that created a domino effect when combined with wider structural issues.

Interpersonal and relational problems

Many participants spoke about the interpersonal and relational problems which precipitated their homelessness. Mirroring the issues faced by the general population, this included family conflict and relationship breakdown as a trigger for homelessness. For some this was a breakdown in a relationship with a parent.

“We became homeless [because] there was an argument with my mum – where we were staying – and because of the arguments she tried to kick my boyfriend out and I’d just had enough of it, so we left.” (Female, 16-24, Czech)

Others spoke about how the breakdown of their relationship with a partner or the loss of a loved one contributed to their homelessness. A number of the women who participated in the research also spoke of experiencing domestic abuse, which was a key cause of their homelessness and housing difficulties.

“Basically I’ve had a bit of trouble, a lot of trouble actually with my partner... I have presented as homeless... For me, it’s a very clear situation; I don’t want to be with him, I don’t want to live in this house, but on the other had I am very scared of going to the hostel. It’s difficult because I was raised by my parents... and my parents gave each other support and respected each other. Here it’s a different story. At the moment my daughters are staying in Poland... because I am very afraid to bring them to this house. It’s a very difficult situation for me.” (Female, 35-44, Polish)

Health problems

Poor physical health, either as a result of disease and persistent health conditions or following an injury, were common reasons for participants’ inability to work. Poor health was also experienced as a barrier to resolving homelessness and housing difficulties.

“The difficulties started, obviously, because I experienced problems with my legs... and I was waiting for an operation. And because of that I couldn’t work... I loved my job. I always loved my job. I worked for eleven years in the UK... It’s only the problem with my legs which has stopped me actually working, because it is my passion. This is what I love to do. And obviously, I stopped only because of my medical condition.” (Male, 55-64, Latvian)

One woman explained how her ill health meant that she could not afford to pay rent and had to share a room with her son.

“I don’t have the money, so I have to stay in one room with my son... I used to work and have my wages, things were different... Then I was forced to stay together with my son. I simply cannot afford to have a room to myself... I’m on sick leave because I began seeing doctors and they found diseases... I don’t know what will happen next.” (Female, 45-54, Polish)

As well as physical health problems, a number of participants described their mental health and wellbeing in the context of their housing problems. For many, mental health problems were more a consequence rather than a cause of their housing difficulties, but for some they were a contributing factor.

“At first it was all going very well. For five years. I rented places, not even knowing there are options to live and stay somewhere at lower costs, or at no costs. I was doing well.

Then I began to get ill. First, I got depression. I already had depression after my wife passed away, but then this time I got bipolar disorder. I was admitted to a hospital. After the few months in hospital, when I was discharged, I was on the street. And again, starting from zero, without any money, without anything... And so, I found myself on the street.” (Male, 55-64, Polish)

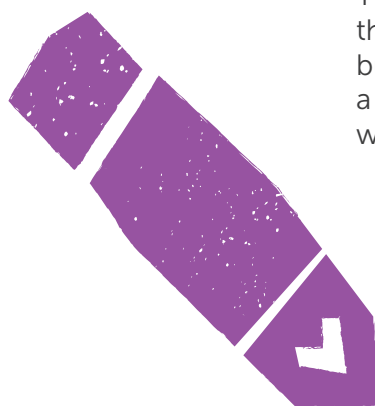
Substance misuse

Some participants spoke about their experiences of substance misuse, primarily to alcohol, and how this was both a consequence and driver of their homelessness.

“[This all started] because of me... I had a good job but couldn’t be bothered to do anything. I had alcohol issues. I wasn’t worrying about anything but only enjoyed myself. It seems all right but you can’t live like this for a long time and have to change something... I’ve already changed things but it’s difficult... it’s difficult to get back on your feet so to speak. It’s difficult when you didn’t do anything for such a long time, but I need to get back on the right track...” (Male, 25-34, Polish)

Drinking alcohol was described at times as a way to cope with traumatic personal events, including those already described above. Drinking could then trigger or exacerbate people’s housing difficulties.

“I actually had a fight, or an argument, with my partner and because of that, I started drinking. That’s the reason why my documents were either stolen or left or I couldn’t find them anymore. They were left on this bench and that’s how I lost them. And it was because of too much drinking... since I split up with that lady, I’ve been drinking every day. Only if I don’t have any money then I don’t drink...” (Male, 35-44, Romanian)





This section has highlighted a number of ways in which the circumstances of participants' personal lives have contributed to their homelessness. It is important to note that these factors are multifaceted and complex, but when combined with the structural factors and service failures also described in this section, they can have major consequences, both in terms of driving homelessness and increasing the challenges of resolving someone's housing situation.

Drivers of homelessness: System failures

While many of the drivers of homelessness highlighted through the research related to the structural and personal factors discussed above, a further set of factors were based on how individuals had faced barriers to accessing sufficient support. In many cases, participants who faced loss of employment and challenging financial circumstances were left without an adequate safety net, which served to exacerbate and prolong their housing difficulties.

For some participants, the issues they faced were similar to those experienced by the rest of the UK's homeless population. For instance, individuals noted that the support provided by Universal Credit was insufficient to meet living expenses. Others highlighted problems with delays in accessing support from the council and the quality of social housing.

However, many participants raised issues that were specific to their status as EU citizens. A number explained how for long periods they had not come forward to make a claim for benefits or assistance from the council because they were unaware they were entitled to such support or they faced language and communication difficulties. One participant explained

how they had not known about the process of making a benefit application.

"He said he didn't know at the time that he could get benefits, because obviously when he worked, he never thought about it, and he didn't know how to do them, how to apply for benefits." (Male, 55-64, Latvian)

Another felt that there were too many practical difficulties involved in accessing the benefits system.

"I don't even know how to apply for [benefits] because, you know, at the moment I don't have even a steady address... to pick up the documents about my settled status I have to... use the mission address. So, I don't even know how to start with this." (Male, Polish)

Where participants had made a claim, they had on a number of occasions been rejected or had had to wait for long periods for a resolution. In some cases, it was clear this was because they had failed the habitual residence test due to not having a qualifying right to reside for benefit purposes. Generally, people did not refer to the habitual residence test directly, even though it is likely this was the key barrier, because the process of claiming benefits was often opaque and hard to understand. Participants spoke of being unable to access benefits due to administrative issues or a lack of documentation, which is likely to have been connected to a failure to pass the habitual residence test. In some cases, these issues emerged because claimants were working in the informal economy and so were unable to provide proof of employment.

"I am supposed to have the tax number, right. I have not worked through the required time. Like I said, I worked more often for the illegal employers than the legitimate

ones, but I have another problem as it turned out that in 2018, at the end of 2018 I received the tax number and I did not earn any money and I've not completed my tax return.” (Male, 45-54, Polish)

For many of the people interviewed for the research, access to benefits was tied to the issue of applying for the EU Settlement Scheme, because a successful grant of settled status would provide an automatic right of residence for the purpose of passing the habitual residence test. Data from the research surveys, which were conducted in the period three to six months before the 30 June 2021 deadline for the EU Settlement Scheme, reveals a concerning picture, with a significant proportion of respondents having not yet secured status under the scheme. For those who had experienced homelessness in the last two years, including those who had been rough sleeping, just under half had been granted either settled or pre-settled status. The remainder were either waiting for an outcome on their application (10-11%), had had their

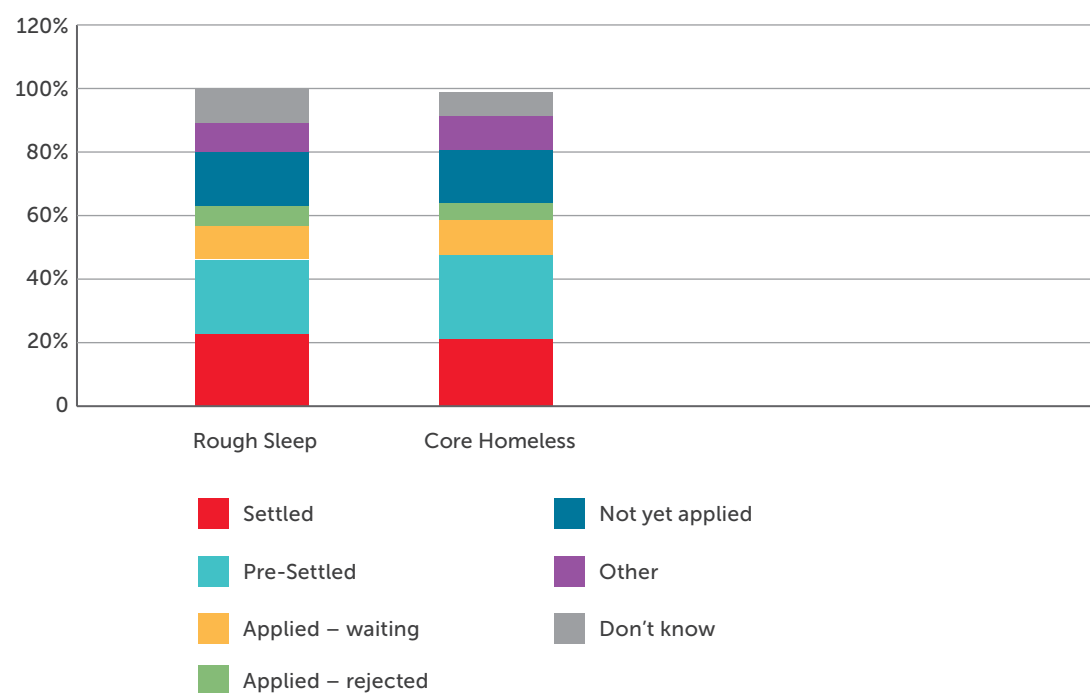
application rejected (5-6%), had not yet applied (17%) or didn't know (18-20%). This is despite the position that most of the households responding in both of these surveys expected or wanted to remain in the UK.

Participants who were interviewed for the research raised a number of issues with the EU Settlement Scheme, some of which had affected their housing situation. Some participants highlighted delays with their application.

“[The application process was] terrible. I waited six months. Two times I sent my passport, and they have [made] a mistake.” (Female, 35-44, Polish)

Some participants who were awaiting the outcome of their EU Settlement Scheme application reported that they were unable to get Universal Credit until they had secured their status, which meant they were waiting for a resolution to their situation from the Home Office.

Figure 9 – Status of application to the EU Settlement Scheme by recently rough sleeping or core homeless (3-6 months before deadline)



“I would like to [apply for benefits] but to do this I would need to get my status first. Then I could apply for this first benefit and receive some 400 pounds like others do. From what I know, first you need to get your legal status and a bank account.” (Male, 35-44, Polish)

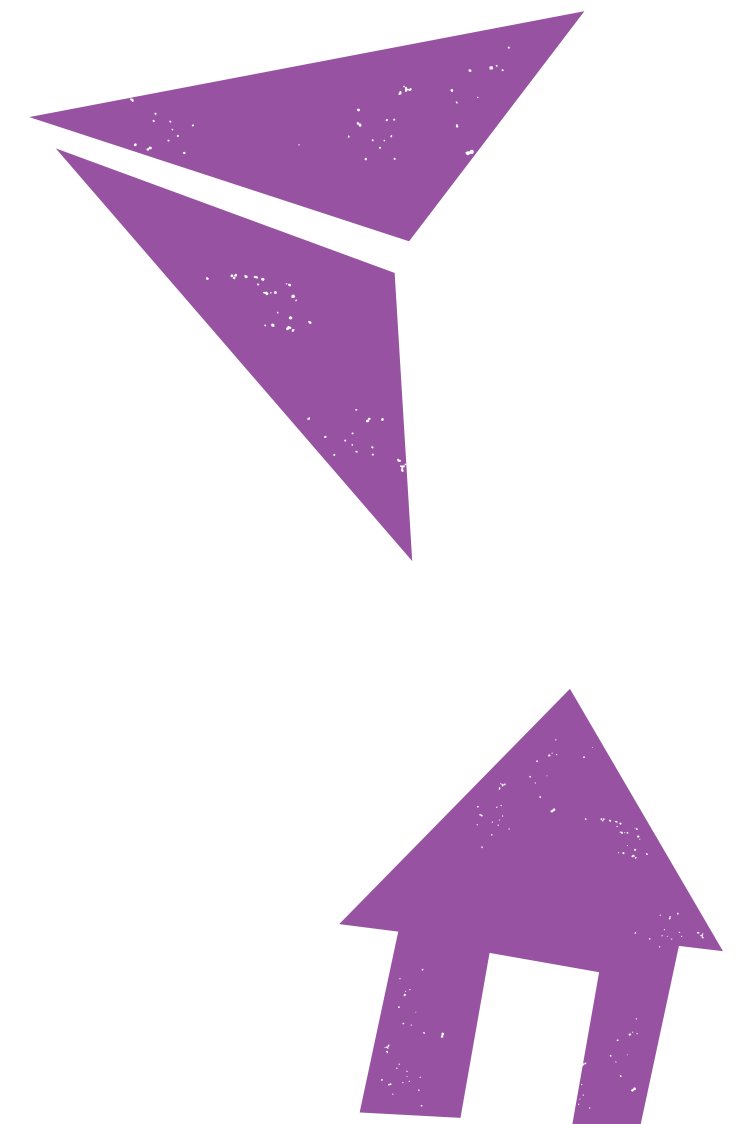
“He hasn't applied for benefits or Universal Credit because he applied for his settlement status and that didn't come back yet. He is still waiting. So, he can't apply for Universal Credit. I asked him when he applied for settlement, and he said it's been three months already.” (Male, 35-44, Romanian)

Other issues were also raised about the impacts of delays in the EU Settlement Scheme. In one case, a participant on Universal Credit who was waiting for the conclusion of their EU Settlement Scheme application highlighted barriers to renting without confirmation of their status.

“I've been waiting for a year now. My passport has been sent to the Home Office for me to be granted the status and all the organisations are trying to help me with something called 'private tenancy'. But what is needed is the scan of my passport and everybody requests my status. So, everything depends on when all the documents come back from the Home Office” (Male, 35-44, Polish)

Overall, the research found that a number of EU citizens were unable to get help for their housing situation, and in particular were unable to access support through the benefits system, as a result of rules restricting EU citizens' access to support. While those who had successfully applied to

the EU Settlement Scheme for settled status were more easily able to get help, those either with pre-settled status or awaiting the outcome of their application tended to face continued barriers. The welfare and immigration system had left some of the individuals interviewed for the research in extended periods of limbo while they tried to resolve their accommodation and employment issues. Welfare rules, administrative delays and confusion over rights and entitlements all contributed in different ways to EU citizens' housing difficulties.



Why we need action now to support EU citizens out of rough sleeping

The challenge facing Government

Across Britain, national governments' responses to homelessness and rough sleeping during the pandemic showed the potential to alter the homelessness landscape beyond recognition. It also showed how this can be achieved quickly and effectively with clear leadership, political ambition and the right policy and practical changes with sufficient funding attached. While much progress has been made in the past 18 months, the task remains far from finished. If the Westminster Government is to meet its commitment to ending rough sleeping it must complete the task and focus efforts on providing people with a home to call their own and any support they need to keep it. A new strategy to end homelessness is needed that addresses the specific barriers that affect people who are not originally from the UK and tackles the issues that are forcing people to sleep rough in the first place. This must include action to tackle the structural factors that currently make it more

difficult for many EU citizens to find and sustain an affordable home.

It is clear that EU citizens are significantly more likely to experience homelessness in comparison to British nationals and that the existing offer of support is not working for many people. This is particularly the case for those with pre-settled status who have limited entitlement to benefits, and for people who are still waiting to secure status under the EU Settlement Scheme. Extending eligibility to benefits and homelessness assistance for EU citizens with pre-settled status would ensure that support is there for people if they experience life events that put them at risk of losing their home, whether that is a loss of employment, bereavement or a relationship breakdown. This would strengthen the safety net and ensure that people can get help when they face difficult times, so that fewer people end up being pushed into homelessness.

A significant number of EU citizens are at greater risk of homelessness

and are at risk of losing their rights to live and work in the UK, because they have not successfully secured status under the EU Settlement Scheme. Many more will only have pre-settled status, meaning at some point in the next five years they will need to make a new application for settled status before their temporary leave runs out. It is vital that the current gaps in the availability of specialist immigration advice and casework support are addressed to ensure this support is there for everyone who needs it. The Government should also consider reducing the evidence requirements for converting pre-settled status to settled status so people are not left at greater risk of homelessness because they are stuck in a situation where they are unable to extend their leave.

As we emerge from the pandemic, the Government must seize this opportunity to set out a bold new vision that ensures everyone experiencing homelessness has a route to move into safe and stable housing. To be successful, this must be a truly cross-government strategy that ensures immigration, housing and welfare policies are designed around a shared goal of ending homelessness. Immigration policies that target people sleeping rough with enforcement action risk pushing people in the most vulnerable circumstances further from support, putting them at risk of exploitative work, accommodation, and potentially modern slavery. This is not an effective way to help people move out of homelessness. We urge the Government to focus on solutions that tackle the root causes of homelessness and help people to move on into safe and stable accommodation.

In the short-term there are some key interventions that would offer immediate help to support those who are currently rough sleeping to move out of homelessness and into a safe and stable long-term home. The research identified that

difficulties finding secure, properly paid employment was a central issue for many EU citizens with recent experience of rough sleeping or other severe forms of homelessness. Providing intensive, tailored support to help people overcome the barriers they face to finding and sustaining formal employment will have an immediate impact and help to provide a route out of rough sleeping for many EU citizens. To ensure this support can be successful it is important that it is provided alongside accommodation so that people have a stable base that will allow them to engage with support. This will help to ensure the progress made during the pandemic is not lost and everyone sleeping rough has a route out of homelessness and into a long-term home. This will be critical to helping the Westminster Government to meet its manifesto commitment to end rough sleeping by 2024.

IPPR and Heriot-Watt University's research provides a comprehensive picture of the drivers and experiences of homelessness amongst EU citizens in Britain, and clearly demonstrates the additional challenges that many EU citizens face when trying to resolve their housing difficulties and move out of homelessness for good. Building on the findings of this research, we have carried out a further process of consultation to identify what an effective programme of support must include if it is to help EU citizens who are rough sleeping to overcome these challenges and to find and sustain a long-term home. This consultation has included:

- A review of relevant existing evidence, including research looking at employment support for people experiencing homelessness, successful approaches to ending rough sleeping and the problems currently experienced by EU citizens who are homeless.
- Four consultation sessions with Crisis client services staff, including

Service Directors, Operational Managers and Coaches, which sought to gather feedback on the research findings and emerging policy solutions, and gather information about the issues facing EU citizens being supported by our services and the provision available to help them move out of homelessness.

- Three consultation sessions with the Crisis EU citizens' experts by experience group, which was set up to support this project, and is made up of EU citizens who have experienced or are currently experiencing homelessness in Britain.
- Consultation with sector and local authority experts, including through a Policy Advisory Group for the research project. This included officials from national and local governments in England, Scotland and Wales, academics and leading experts in the homelessness and migrant sectors.

Based on the findings of this work, we are recommending that the Westminster Government urgently bring forward funding for a bespoke package of housing and employment support for EU citizens whose needs are not being met by current programmes. In order to effectively reduce the numbers of EU citizens experiencing rough sleeping, this package of support should include:

- **Provision of emergency accommodation so people have a stable and safe place to stay while engaging with employment support.** The length of time that temporary accommodation will be needed for will be different for each individual but it will need to be available until someone has found stable employment and a long-term home. The experience of services currently supporting EU citizens to move out of rough sleeping

suggests that this is likely to take on average around six months.

- **A lead worker for every individual** being supported through this programme to provide consistent, holistic support throughout a person's journey from rough sleeping into stable employment and a long-term home.
- **Support to find and sustain stable, consistent and properly paid employment.** This must include support to help people overcome the barriers they face to finding and sustaining work. Depending on each person's needs this may include the provision of training, help to overcome language barriers, and support to access health services and specialist alcohol and substance misuse services.
- **Specialist welfare and immigration advice and advocacy** to ensure people can access the support services they are entitled to.
- **Help to move into and sustain long-term housing.** For most people, this is likely to mean support to find an affordable tenancy in the private rented sector.
- **Funding for interpreters** so language is not a barrier to accessing support.

Provision of emergency accommodation

The pandemic response has helped to demonstrate the significance of providing stable accommodation over a consistent period, and the difference this makes to enabling someone to engage with support and start to take steps to move out of homelessness for good. Staff from Crisis' services have reflected that this has made a significant difference to the work they are able to do with non-UK nationals who are rough sleeping, because it has

helped people to meet their immediate needs for shelter and food, meaning they can engage with services to access support with employment, accessing benefits and finding longer-term accommodation.

In interviews conducted during independent research, commissioned by Housing Justice, and described in the report *A New Season*, there was a strong belief among guests, volunteers, coordinators and partners (including local authorities) interviewed that 24-hour access, self-contained or single room accommodation was more desirable than the communal, night-time-only model. The reasoning was that it "provided privacy and stability for guests, and made it easier for them to access support and employment."⁴⁹ Simply, we cannot nor should not expect people to be able to have the mental and physical wellbeing to engage in services if they are in the midst of the traumatic experience of homelessness; and particularly so when people are sleeping rough or forced to sleep in communal accommodation.

The provision of emergency accommodation will be critical to the success of this tailored package of support for EU citizens, as it will provide a safe and stable base that will enable people to engage with support and successfully move into employment and their own home. The length of time this temporary accommodation will be needed for will vary for each individual, depending on their individual circumstances. Local authorities and homelessness services supporting EU citizens both before and during the pandemic found that it often took longer than expected to help people overcome the barriers they faced to getting into secure employment.

Between March and September 2020 Crisis conducted research to understand the impact of Covid-19 on people experiencing homelessness and service provision across Britain. Local authorities welcomed the measures taken by the Government to temporarily suspend eligibility criteria during the pandemic and provide emergency accommodation based on need alone, however they raised concerns about their ability to support people with no recourse to public funds out of emergency accommodation and to resolve their homelessness. Measures such as the decision to suspend an EU derogation to enable local authorities to provide a limited amount of additional support to EU citizens who were rough sleeping and were not eligible for statutory support were welcomed, however many local authorities emphasised that the three months of support this allowed them to provide was not long enough to help people get into work and find longer-term accommodation.⁵⁰

Crisis Skylight Croydon has been delivering the Migrant Employment and Accommodation Service (MEAS), a programme of housing and employment support for EU citizens who do not have access to benefits, since October 2018. Funding was initially provided for 12 weeks of temporary accommodation; however, they have found that in most cases 12 weeks was not enough time to successfully help someone secure employment and move-on accommodation. Prior to the pandemic, they found that the average length of time an individual needed to stay in temporary accommodation before moving into their own tenancy was 16-18 weeks.

For this programme of support to be successful, it is vital that sufficient funding is provided to ensure that

49 Hough J., and Rice, B. (2021) *A New Season for Night Shelters Research Report*. London: Housing Justice

50 Boobis, S. and Albanese, F. (2020) *The impact of COVID-19 on people facing homelessness and service provision across Great Britain*. London: Crisis

people can stay in temporary accommodation until they find formal employment and a long-term home. For most this is likely to be needed for around four to six months. However, some individuals who face greater barriers to finding and sustaining formal employment are likely to need to stay in temporary accommodation for a longer period while they access support to overcome these issues. This might include doing training to gain qualifications; taking ESOL classes to improve their English skills; getting treatment for physical or mental health problems; or accessing support to apply to the EU Settlement Scheme. It is important that this flexibility is built into the programme so that people can be supported to move into stable employment and do not feel pressured to accept informal, cash in hand employment offers, which could actually make it harder for them to move out of homelessness.

Personalised, holistic support

There is extensive evidence from a range of programmes supporting people to move out of homelessness demonstrating the effectiveness of personalised, holistic one-to-one support provided by a dedicated lead worker.⁵¹ This intensive case management approach allows individuals to get support for both emotional and practical needs, with the core goal of helping people to maintain their housing. This may include helping people develop plans, get support for physical and mental health needs, gain new skills and build relationships in their community. The length of time that support is provided

for is determined by the needs of the client. Intensive case management is a key element of the Housing First and Critical Time Intervention models, which are both examples of successful, evidence-based programmes that are proven to help people sustain a long-term home and leave homelessness behind for good.⁵²

An international evidence-review of what works to end rough sleeping found that person-centred support, including choice for the individual, was a key element of successful approaches to supporting people who had been rough sleeping for long periods into accommodation.⁵³ The evaluation of the Tackling Multiple Disadvantage project, also found that personalised housing and employment coaching is an effective model to support people experiencing homelessness with multiple and complex needs into employment.⁵⁴

The importance of having a dedicated case worker providing ongoing personalised support was also emphasised by the EU citizens in the experts by experience group we worked with to develop these recommendations. This was felt to be vital to help people sustain work and housing, successfully manage any problems that arose and access any other support services needed.

It is important that case workers have the time to work effectively with each individual they are supporting, and this will only be possible with small caseloads. Studies evaluating different case management models supporting people out of homelessness found that the more intensive the support was,

the more successful the programme was.⁵⁵ A maximum case worker to client ratio of 1:7 is recommended for Housing First, which is well-evidenced as a successful approach for ending the homelessness of people with multiple and serious needs. The importance of small caseloads is also reflected in the experience of our own services.⁵⁶ Crisis' MEAS project works intensively with EU citizens to help them find employment and move out

of rough sleeping and has found that having small caseloads of between five and eight clients per support worker allows them to provide the responsive, flexible support needed to successfully help people into employment and a long-term home.

Similar to the Critical Time Intervention model, a case management approach to supporting people who are vulnerable to homelessness during

Migrant Employment and Accommodation Service, Croydon Council and Crisis Skylight Croydon

The Migrant Employment and Accommodation Service (MEAS) is a partnership between Croydon Council and Crisis Skylight Croydon to provide accommodation and intensive support for EU citizens rough sleeping, or at risk of rough sleeping, in the borough. The project began in October 2018 as a six-month pilot, which has since been extended.

Croydon Council provided funding for 12 weeks in temporary accommodation while Crisis provided intensive support to help clients to secure employment and move-on accommodation in the private rented sector. To provide the level of support needed case workers had small caseloads of between five and eight people.

The project has found that for most of the client group in need, 12 weeks is not sufficient to provide the intensity of support required to successfully help people move into employment and settled accommodation. In reality, most people needed 16-18 weeks in temporary accommodation to achieve these outcomes.

Crisis Skylight Croydon developed a bespoke partnership with Veolia, a local employer who are the waste management provider for the borough – this has been key to the success of the project. Veolia helped Crisis develop an ESOL course to provide the language skills necessary to pass their induction, creating a pathway directly into employment.

For a large proportion of the clients being supported by the project, gaining employment brought to the surface other issues that they needed support to manage, for example, gambling addictions, substance misuse and being victim to exploitation. To meet this need and ensure that these issues did not prevent people from sustaining their employment and accommodation, staff members work in an extremely flexible and responsive way, often seeing clients every day for a period.

Prior to the pandemic, approximately 80 per cent of people supported by the project secured employment and moved into longer-term housing.

51 Social Care Institute for Excellence (2018) *A rapid evidence assessment of what works in homelessness services*. London: Crisis

52 Downie, M., Gousy, H., Basran, J., Jacob, R., Rowe, S., Hancock, C., Albanese, F., Pritchard, R., Nightingale, K. and Davies, T. (2018) *Everybody In: How to end homelessness in Great Britain*. London: Crisis.

53 Mackie, P. Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: What works? And international evidence review*. London: Crisis

54 Friel, S., Murphy, H., Klenk, H. & Vaid, L. (2020) *Tackling Multiple Disadvantage: Final Evaluation Report*. London: Learning & Work Institute.

55 Social Care Institute for Excellence (2018) *A rapid evidence assessment of what works in homelessness services*. London: Crisis

56 Homeless Link (2019) *Delivering high fidelity Housing First: Guidance for services*. London: Homeless Link



periods of transition, the support provided for EU citizens through this programme would be most intensive during the initial period where someone is in emergency accommodation and being supported to find work and a long-term home. At the point where someone has secured employment and moved into their own home, the intensity of the support needed would be expected to gradually reduce. It is important that the lead worker can continue to work with people during this period to help them manage any challenges that arise and ensure that they are able to sustain their employment and their tenancy. A key priority for the lead worker during this time should be helping the person to access any mainstream support services they need so they have a support system in place and are not at risk of being pushed back into homelessness in future.

Support to find and sustain stable, consistent and properly paid employment

Employment – both losing work and difficulties finding decent employment – is one of the key themes identified through the research as a contributing factor causing and prolonging EU citizen's experiences of homelessness. Finding sustainable work can provide a route out of homelessness, especially for EU citizens with pre-settled status whose entitlement to statutory support is often linked to their economic activity.

The research identifies a clear problem with informal and sometimes exploitative work. In addition to the harm caused to an individual by exploitative employment practices that can result in people not being paid properly for their labour and forced to stay in unsuitable, potentially dangerous accommodation, this type of work also makes it much harder for

people to successfully move out of homelessness and sustain a tenancy. It can also make it harder for people to find employment in the formal economy as it often means they will not have gained formal qualifications and their skills may not be recognised by employers.

Accepting informal or cash in hand employment can impact on an individual's ability to claim benefits if they need help to top up their wages or they lose their job. Often this type of work isn't considered genuine and effective for the purposes of an assessment for benefit eligibility, and it can be difficult for people to provide the necessary proof of their employment if they do not have a contract or payslips. This is an issue that was highlighted by many of the EU citizens interviewed for the research. It is also a problem regularly encountered by our client services' teams as they support EU citizens to move out of homelessness. They report that cash in hand and other informal work arrangements are often the types of employment most immediately available to the people they are working with, and therefore seem to be the best available option, especially for individuals who are not entitled to statutory support and have no other income to support themselves. However, it is often very difficult to secure and sustain long-term accommodation, like a private rented tenancy through short-term, informal work arrangements, so this can lead to people repeatedly experiencing rough sleeping.

Being employed, even full-time, does not by itself prevent people from experiencing homelessness. Low paid or unstable employment can actually increase homelessness risk in some cases, because of difficulties in budgeting, challenges claiming benefits to top up low wages, and difficulties in handling changes in

57 Gray, T. (2020) *Employment and homelessness in the context of the new economy following Covid-19*. London: Centre for Homelessness Impact

What does good employment look like?

- An employment contract with minimum hours.
- A full induction and support for new employees, including a peer mentoring or buddy system.
- Flexibility embedded into the contract that ensures people can successfully manage their work alongside other commitments they may have. This could include flexibility to allow someone to deal with issues relating to their housing situation, such as viewing properties or contacting a landlord about issues relating to their home; to attend medical appointments; or to fit shifts around their caring responsibilities. This flexibility is key to making the employment sustainable.
- Employer-led training to ensure people have the skills they need to progress in their role and any formal qualifications that are needed to support this.
- Offering clear pathways for career progression.

income when moving in and out of employment.⁵⁷ To ensure that people are able to leave homelessness behind for good, it is critical that they are supported to find stable, consistent and properly paid employment. This means work that is productive and delivers a fair income, security in the workplace and opportunities for personal development.⁵⁸

The Centre for Homelessness Impact's review of what works to help people experiencing homelessness to gain and keep good employment identified some of the key elements of effective employment support. There is consistent evidence that personalised support provided by an advisor with a small caseload, who can provide intensive job preparation, job search and placement advice and motivating support is a critical element of successful employment support programmes. Flexibility to provide bespoke and tailored provision to meet each individual's needs was also identified as being key to success. Other important elements include: active brokerage with employers; informal approaches to overcome

other barriers to work, such as teaching English; wellbeing and mental health support delivered alongside employment support; recognition of the impact of family circumstances; and provision of childcare where needed.⁵⁹ The experience of Crisis' services supporting people who are homeless into employment demonstrates the value of partnerships with employers who can offer meaningful job opportunities and who understand the challenges people are likely to face as they move out of homelessness.

The level of support needed to help someone move into stable, decent work will vary widely. Each person's journey out of homelessness will look different, depending on their personal circumstances. For some people the journey back into work will be relatively straightforward, they may have only been out of work for a short time, not face any language difficulties and just need support to find a stable, formal job that will enable them to afford their own tenancy. However, for others the journey may be less straightforward. The research showed

58 Key elements of the International Labour Organisation's definition of 'decent work'.

59 Gray, T. (2020) *Employment and homelessness in the context of the new economy following Covid-19*. London: Centre for Homelessness Impact

that for many people, a range of inter-related factors had contributed to their homelessness, including physical and mental health problems, bereavement, relationship breakdown, and alcohol use. Language barriers were also a key issue preventing many people from accessing the support they needed and making it harder for them to secure formal employment.

A key part of the lead worker's role will be to provide the support needed to help people overcome the barriers they face to finding and securing decent employment. Where specialist support is needed that the lead worker cannot provide directly, they will act as a navigator and advocate to help people access support through other services.

Support to access training and gain the qualifications needed to work in specific industries will be key to helping people to find stable, properly paid work and avoid the cycle of homelessness that can result from precarious, informal work. For example, this could include training to gain a Construction Skills Certification Scheme (CSCS) card or food hygiene certificates. Provision of vocational training and subsidised access to exams would allow people to gain new skills or formalise qualifications for work they had already been undertaking on an informal basis.

Support to help people overcome language barriers can also have a big impact on people's ability to find employment, especially more stable, formal work. In their research, the Public Interest Law Centre identified a lack of language skills as one of a combination of factors forcing EU citizens into informal 'cash in hand' work.⁶⁰ Crisis' services supporting EU citizens to find employment and move out of rough sleeping have found that the provision of tailored language support can make a significant difference to people's success in securing employment. For example, the Crisis MEAS project partnered with

a local employer to develop an ESOL course for Crisis clients that would provide them with the language skills needed to pass their induction and be successful in their role. This created a pathway directly into employment for EU citizens being supported through the programme, even for those who had limited English. Crisis Skylight Edinburgh have also developed a tailored ESOL offer for EU citizens being supported through their Hotel Employability Programme, which supports non-UK nationals who were rough sleeping and have been accommodated during the pandemic. Offering flexible, often one to one, language support that is appropriate to an individual's needs has been crucial to the success of this work.

It is clear that a one size fits all approach to language support is unlikely to be successful. The lead worker should support individuals to access ESOL support that meets their needs. If the appropriate provision is not available locally then this might involve working with partners to develop a bespoke learning offer. This could include working with employer partners on courses that will help people develop the language skills they need to work in a particular sector.

The support someone needs to find and sustain decent employment will vary depending on their individual needs and being able to provide support that is flexible and tailored will be essential to the success of this programme. The work of Crisis' projects supporting EU citizens out of rough sleeping in Croydon and Edinburgh that are described in this report provide two examples of how intensive, personalised and flexible support can successfully help people without access to mainstream homelessness services to find employment and move out of homelessness.

60 Morgan, B. (2021) *Still here: Defending the rights of homeless EU citizens after Brexit and Covid-19*. London: Public Interest Law Centre

Hotel Employability Project, Crisis Skylight Edinburgh

The Hotel Employability Project supports non-UK nationals who are homeless with no access to public funds to help them gain employment and move out of homelessness for good. Many of the people supported through this project are originally from EU countries, including Poland, Romania, Switzerland and Bulgaria. Currently, a large number of this group have pre-settled status, which means they have the right to work in the UK but their access to benefits is restricted.

This group of people often face multiple and complex barriers to gaining and sustaining employment in the UK. Many will have experienced the trauma of being homeless and rough sleeping, and some also have low levels of English and low levels of literacy in their own language.

The project is unique in the local area – it provides a holistic approach, including wraparound learning and support, with a range of classes from employability to English language skills, as well as the structured support to apply for, attend and sustain employment once successful. Every individual will have a lead worker, providing them with a single point of contact within the service and support to set goals and work towards outcomes.

Through the project, Crisis have developed relationships with local recruiters and employers, and worked with them to design learning that will give people the best chance of gaining and then sustaining employment, thus bringing an end to their homelessness for good. These relationships have enabled Crisis to build in feedback-loops to learning

so that the skills we teach fill the gaps employers are looking to fill in the workforce.

Clients supported through the project are offered two classes a week, on top of regular one to one support. This regular contact helps people to retain information, progress their skills more quickly and enables lead workers and teaching staff to build rapport and engagement with individuals, all of which increases their likelihood of gaining employment and ending their homelessness sustainably.

Flexibility and tailoring support to meet people's individual needs have been key to the success of this project. For example, when an employer made project staff aware that a client was struggling with their employee portal app and had missed several shifts as a result, the project was able to support the member to learn about the app and they are now confident in using it independently. This approach has enabled the project to support clients to apply to emerging jobs more quickly, prepare people for interviews and use all available resources, including interpretation services, purchasing uniforms or equipment, and supplying phones and top-up, to help people find work and keep it.

Since August 2020, 44 clients have been supported to apply for jobs and 20 have gained employment. Once someone is working, they are more likely to be eligible for benefits and homelessness support from the local authority, so their lead worker will support them to apply for Universal Credit to top up their income if needed and to find stable housing.



Hotel Employability Project, Crisis Skylight Edinburgh (continued)

The Covid-19 pandemic has provided both opportunities and challenges for working with people with no recourse to public funds. Most significantly, providing people with stable accommodation and support to meet their immediate needs has enabled them to engage with support and employment opportunities. Before the pandemic clients were reliant on night shelter beds, which changed location regularly and only gave people access overnight and during the winter months. When the Government began providing people with self-contained accommodation in response to Covid-19 it provided people with a stable base, regular meals and their own bathroom. This meant clients

were properly rested and had their most essential needs met, so they were able to consistently attend classes, take the time to find decent, reliable work that will help them to move out of homelessness, and access support with mental health and any other needs they may have.

However, the pandemic has also come with challenges, particularly trying to navigate providing support remotely and overcoming barriers of language and digital exclusion. The team have come up with creative solutions to help make sure people could still make progress and access the support they needed even when it could not be provided in person.

Case studies from Crisis Skylight Edinburgh's Hotel Employability Project

Client W

Background: Belgian national with pre-settled status who was living in hotel accommodation provided during the Covid-19 pandemic. Could speak a variety of languages including English, but lacked confidence when using IT.

Project engagement: Was welcomed onto the employability project in August 2020 and had to navigate a very challenging employment environment during the pandemic. In October, they were successful in applying for a cookery apprenticeship which provided paid culinary training opportunities for three months. This saw a massive improvement to their confidence and later saw them gaining employment as a manager

for a major restaurant chain. The client was also supported to apply for Universal Credit and to approach the local authority for housing re-assessment. They can now bid weekly for council properties.

Next Steps: Client W has been able to sustain employment and is now working with Crisis' private rent team in Edinburgh to find more permanent housing. The project will provide further support to ensure he can continue to sustain work.

Client Y

Background: Romanian national with pre-settled status who was placed in a temporary flat with their family. Had completed education in Romania and had good IT and English levels. The client's main

barrier to securing employment was finding work that would fit around their family's childcare needs.

Project Engagement: Client Y has been engaging with the project weekly since February 2021 receiving support around confidence building, ESOL, job searching and developing IT skills. In May 2021, they were successful in obtaining work in a hotel that is flexible so fits around their childcare needs. Client Y also completed Crisis' certificated short-course on ESOL skills for Telephone Conversations and is now attending higher level English classes.

Next steps: Client Y will continue to be supported around job sustainment and money management. This support is currently focused on bills and tenancy management with the aim to allow their family to sustain their temporary flat until a more permanent solution is offered.

Client X

Background: Spanish national with pre-settled status who was placed in hotel accommodation provided through the Scottish Government's

Covid-19 emergency funds. They could speak very little English but were skilled with IT.

Project Engagement: Started working with the project in December 2020 and by March 2021 they had been supported into employment as a cleaner. The support provided by the project focussed on helping them identify their skills and on being able to explain them in enough detail in Spanish, and then using interpretation software, e.g. Google Go and Google Translate, to support them at interview.

Next steps: Client X has managed to sustain their employment and has received support from the project to achieve a promotion. They are now a senior member of staff. Through gaining employment, the project was also able to support Client X to present at the council and get re-assessed as eligible for homelessness support meaning their access to temporary accommodation will remain when the Covid-19 money ends. They can now start bidding for council housing. They are also working with Crisis' private rent team in Edinburgh to look for a long-term home in the private rented sector.

Supporting people to access other services

While the research showed that the primary drivers of homelessness for EU citizens were employment and income related factors, other inter-related issues also played a role, including physical and mental health problems, bereavement, relationship breakdown, and alcohol use. Crisis' research looking at the support available for non-UK nationals experiencing homelessness in Britain

found that the lack of accessible support services made it more difficult for non-UK nationals to move out of homelessness and sustain long-term housing.⁶¹ Making sure EU citizens who are rough sleeping can access support to help them address any issues that make it harder for them to sustain employment and move out of homelessness will be vital to the success of the programme and preventing people returning to rough sleeping in future.

61 Boobis, S., Jacob, R., and Sanders, B. (2019) *A Home For All: Understanding Migrant Homelessness in Great Britain*. London: Crisis

In line with the case management model, a key part of the lead worker's role will be to assess and understand people's needs, and to negotiate and coordinate access to existing support services. EU citizens with settled and pre-settled status are eligible for free secondary NHS care as long as they are resident in the UK, however many EU citizens with experience of homelessness still face difficulties accessing health care services.⁶² Eligibility for community drug and alcohol treatment can be less straightforward. This is often linked to entitlement to welfare benefits and statutory homelessness assistance, meaning many EU citizens experiencing homelessness will not be able to access this support.

Inclusion health

People experiencing homelessness, particularly those who are sleeping rough, are significantly more likely to suffer from chronic illnesses such as heart disease and respiratory disease and to develop these illnesses at an early age. This is compounded by poor access to healthcare. Research commissioned by Crisis has found that the longer people experience homelessness, the more likely they are to develop additional support needs, including mental and physical health needs.⁶³

The link between health and homelessness is also reflected in EU citizens' experiences of homelessness in Britain. Mental and physical health problems were both a contributing factor and a consequences of people's housing difficulties. Mental health problems were common among participants in the research, and people described their mental health

and wellbeing in the context of their housing problems. For many, mental health problems were a consequence of their housing difficulties and participants highlighted how the experience of homelessness had created new stresses and anxieties. For some participants, mental health problems were also a contributing factor to their homelessness.

Many participants also cited poor physical health – as a result of disease, persistent health conditions or sustaining an injury – as contributing to their inability to work and their housing situation. Homelessness often led to a deterioration of health and these problems were difficult to cope with while homeless.

People experiencing homelessness face significant barriers to accessing healthcare, including stigma, lack of a fixed address or photo ID, fragmented services, a lack of continuity of care because of unstable accommodation, and a lack of awareness by healthcare professionals of people's multiple needs. Research from the Public Interest Law Centre has identified additional barriers faced by many EU citizens experiencing homelessness that make it even harder to successfully access health services. Issues included: EU citizens being wrongly asked to pay for secondary NHS care; services wrongly advising EU citizens about their rights to NHS care; GP surgeries refusing to register EU citizens who are homeless; a failure to provide interpreters; and a lack of appropriate provision for those who need psychological support, especially for those who do not speak fluent English.⁶⁴

Inclusion Health services overcome these barriers by delivering a multi-disciplinary model with a wide range of healthcare professionals such as GPs, nurses, and mental health practitioners, and are community facing, often an extension of primary care or hospital services. They are an effective way of ensuring access for people who face multiple barriers to vital health services. Pathway (an Inclusion Health charity) has helped 11 hospitals in the UK create teams of doctors, nurses, social care professionals and peer supporters. These teams support over 4,000 homeless patients every year.⁶⁵

Further embedding Inclusion Health approaches across the healthcare system would be hugely beneficial in improving homeless health, including for EU citizens, and it is vital that Government ensures this becomes a reality. This could be achieved through more widely commissioning Inclusion Health services and ensuring Inclusion Health forms part of the Health and Care Bill, which is designed to improve the accessibility of the healthcare system to meet patients' needs and reduce health inequalities.

In the short-term, lead workers will play a vital role in supporting EU citizens who are experiencing homelessness to overcome the barriers they face to accessing healthcare services. This will include making people aware of their rights, for example to register with their GP and access NHS care without being charged, and being an advocate where necessary to ensure people are not wrongly turned away from services.

Support with alcohol and substance misuse

Issues with alcohol were identified as both a consequence and a driver of homelessness by participants in the research. Drinking alcohol was described as a way to cope with traumatic personal events, and it could then trigger or exacerbate housing difficulties.

Although substance and alcohol misuse is also prevalent across the general homelessness population, the lack of accessible services and support is a particular issue for non-UK nationals.⁶⁶ In addition to being locked out of some services due to eligibility criteria, a range of other factors also make it more difficult for EU citizens who are homeless to access support with alcohol and substance misuse. This includes confusion over entitlement to NHS services, problems registering with primary health care services, language and interpretation problems, and the absence or closure of specialist, language-appropriate substance misuse services.⁶⁷

The lead worker will be able to support people to overcome some of these barriers, however where people are unable to access services because eligibility is linked to benefit entitlements, further intervention will be needed to ensure this support is accessible to EU citizens who are experiencing homelessness. It is vital that eligibility for community and residential alcohol and substance misuse support is extended to all EU citizens who have been granted status through the EU Settlement Scheme. Without this change, this will remain a key barrier to finding and sustaining employment and moving out of rough sleeping for some EU citizens.

62 Morgan, B. (2021) *Still here: Defending the rights of homeless EU citizens after Brexit and Covid-19*. London: Public Interest Law Centre

63 Mackie, P. and Thomas, I. (2014) *Nations Apart? Experiences of single homeless people across Great Britain*. London: Crisis.

64 Morgan, B. (2021) *Still here: Defending the rights of homeless EU citizens after Brexit and Covid-19*. London: Public Interest Law Centre

65 Pathway (GP-led in-hospital management of homeless patients): <https://www.england.nhs.uk/%20ltphimenu/improving-access/pathway-gp-led-in-hospital-management-of-homeless-patients/>

66 Boobis, S., Jacob, R., and Sanders, B. (2019) *A Home For All: Understanding Migrant Homelessness in Great Britain*. London: Crisis

67 Morgan, B. (2021) *Still here: Defending the rights of homeless EU citizens after Brexit and Covid-19*. London: Public Interest Law Centre

Specialist welfare and immigration advice and advocacy

Difficulties navigating statutory systems and understanding what evidence is needed to demonstrate eligibility for support was a key factor contributing to EU citizens' homelessness identified by the experts by experience group working on this project. Participants spoke about the lack of knowledge and information about how to successfully access support. They also emphasised how much harder this made it for people to move out of homelessness.

The research also highlighted a number of issues that EU citizens who were experiencing housing difficulties faced when trying to access support, especially through statutory services. EU citizens with pre-settled status faced particular difficulties navigating the benefits system, and there is evidence of EU citizens being wrongly denied benefits. The Public Interest Law Centre cited numerous examples of EU citizens who had been refused benefits or had their benefits stopped because they had been wrongly assessed as not having a qualifying right to reside.⁶⁸ This experience is also reflected in the findings of Crisis' research looking at homelessness among non-UK nationals in Britain. Services supporting non-UK nationals who were homeless reported that within the Jobcentre Plus there can be a lack of understanding about what the benefit entitlements are for different immigration statuses.⁶⁹

IPPR research looking in more detail at the operation of the habitual residence test also identified the particular challenges that EU citizens often face

proving their entitlement to benefits.⁷⁰ Both claimants and Jobcentre advisors reported that the 'right to reside' test many EU citizens must pass in order to be eligible for Universal Credit is complex and it can require substantial work to establish whether someone meets the necessary requirements. Many claimants also were not aware that if they lost their job they could retain their worker status, and thus their access to Universal Credit, for six months after losing their job. Through the research IPPR heard accounts where people did not immediately make a claim because they thought they would find a job but who were then subsequently unable to access funds because they had left it too late.

The Public Interest Law Centre research identified restrictions on EU citizens' access to benefits and unfamiliarity with rights and entitlements as central factors driving homelessness amongst EU citizens. This was exacerbated by a lack of specialist welfare advice for non-UK nationals, with many homelessness services and some advice organisations lacking the necessary training to effectively support and advise EU citizens on their entitlements to benefits.

EU citizens with experience of homelessness have also faced specific challenges in applying to the EU Settlement Scheme. Lack of ID and proof of time spent in the UK, limited digital access, lack of knowledge about the scheme and a reluctance to apply, or an assumption that their situation will make them ineligible, are all factors that have made it harder for people who are homeless to make a successful application. Delays in decision making have also had a particular impact on people

68 Morgan, B. (2021) *Still here: Defending the rights of homeless EU citizens after Brexit and Covid-19*. London: Public Interest Law Centre

69 Boobis, S., Jacob, R., and Sanders, B. (2019) *A Home For All: Understanding Migrant Homelessness in Great Britain*. London: Crisis

70 Parkes, Henry and Morris, Marley (2020) *Testing times: Universal credit and the habitual residence test*. IPPR

experiencing homelessness and make it more difficult for people to resolve their housing difficulties. Participants in the research highlighted the barriers to accessing Universal Credit, to renting and to finding employment they experienced while waiting for the outcome of their application to the EU Settlement Scheme.

The research also demonstrated that there are likely to be a significant minority of EU citizens who did not manage to successfully apply to the EU Settlement Scheme by the 30 June 2021 deadline. Although late applications will be accepted where someone is deemed to have reasonable grounds for missing the deadline, it is likely that this will require the support of an OISC-accredited immigration advisor. The difficulties accessing immigration advice and the lack of capacity in the sector is well-evidenced⁷¹, and there are concerns that there will not be sufficient support available to meet the potentially growing need of EU citizens who are eligible for the EU Settlement Scheme but have not yet managed to secure their status. People in this situation will face additional barriers to accessing support and are likely to be even more vulnerable to exploitation and destitution as a result.

The research highlights how welfare rules, administrative delays and confusion over rights and entitlements all contributed in different ways to participants' housing difficulties. In addition to looking at the reforms needed to the systems themselves to ensure people experiencing homelessness are not excluded, it is clear that access to specialist welfare and immigration advice and advocacy will need to be a critical part of the support provided to help EU citizens move on from rough sleeping. Helping

people to secure their immigration status and access the benefits they are entitled to will be crucial to enabling them to sustain a settled, long-term home.

Making additional funding available to address the gaps in both specialist welfare and immigration advice will be crucial for helping EU citizens who are rough sleeping to realise their entitlements and move out of homelessness. Employing a small number of specialist advisors directly as part of this programme will help mean that where people are facing issues accessing benefits or securing status through the EU Settlement Scheme they can be directly referred for expert advice and ongoing support to resolve their benefit issues. This will be key to enabling people to move on from rough sleeping.

Support into long-term housing

A safe and stable home provides a foundation that is essential for everything else. An evidence review of what works to end rough sleeping found that having swift access to settled housing has very positive impacts on housing outcomes when compared to traditional approaches to homelessness support, which require people to move through different steps of temporary accommodation, to demonstrate 'tenancy readiness' before being able to access mainstream housing.⁷²

The evaluation of the Tackling Multiple Disadvantage project also found a positive correlation between gaining secure housing and sustaining employment – 48 per cent of jobs were sustained for six months and this rose to 68 per cent of jobs

71 Wilding, J., Mguni, M. and Van Isacker, T. (2021) *A Huge Gulf: Demand and Supply for Immigration Legal Advice in London*. London: Justice Together

72 Mackie, P. Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: What works? And international evidence review*. London: Crisis

73 Friel, S., Murphy, H., Klenk, H. & Vaid, L. (2020) *Tackling Multiple Disadvantage: Final Evaluation Report*. London: Learning & Work Institute

among participants who had secured housing.⁷³ Supporting people to move out of temporary accommodation and into a long-term, settled home as quickly as possible will be key to the success of this programme of support. For most people, this is likely to mean support to find an affordable tenancy in the private rented sector. This type of support is often provided by local private rented sector access schemes, which work with local private landlords to set up a tenancy, provide rent in advance and a deposit, and ensure the tenancy is sustainable by providing ongoing support for the tenant and the landlord.

Support from these schemes is not always accessible to EU citizens with pre-settled status and where people are not able to access existing sources of support funding will need to be provided to cover the up-front costs of securing a private rented sector tenancy, including rent in advance and a deposit. Going forward, we recommend that access to private rented sector access schemes is expanded to include EU citizens with pre-settled status to help ensure people can access this vital support to move out of homelessness into a stable and secure home.

Interpreters

Participants in the research described how language barriers directly contributed to their housing difficulties and prevented them from accessing the support they needed. This included healthcare and support with alcohol and substance misuse, as well as difficulties accessing homelessness services and benefits. Language difficulties and limited access to interpreters were also identified in a recent study on the rights of homeless

EU citizens conducted by the Public Interest Law Centre as one of the factors driving homelessness amongst this group.⁷⁴

EU citizens in Crisis' experts by experience group and Crisis' client services staff have also emphasised the significant barrier that language can be, making it much harder for people to move out of homelessness. Services do not always consistently provide interpreters, and members of the experts by experience group shared the challenges they had faced trying to access homelessness support from local authorities when an interpreter wasn't provided.

For this programme of support to be successful it will be critical that sufficient funding is provided for interpreters where they are needed so that clients can communicate properly with their lead worker and access the support they need to move out of homelessness.

Estimated costs and savings to the Government

Delivering this support successfully will require additional funding. This will include the cost of funding temporary accommodation for an interim period, the cost of providing support services and translation costs for those who do not speak English fluently. This will have a hugely beneficial impact on individual lives, helping people to get into work and to leave homelessness behind for good. It can also be expected that it will generate wider savings and benefits for society. Research has shown that people experiencing multiple periods of homelessness have higher support needs than people who have only experienced

74 Morgan, B. (2021) *Still here: Defending the rights of homeless EU citizens after Brexit and Covid-19*. London: Public Interest Law Centre

75 Mackie, P. and Thomas, I. (2014) *Nations apart? Experiences of single homeless people across Great Britain*. London: Crisis

a short period of homelessness.⁷⁵ This is supported by research which finds that people experiencing long-term and repeat homelessness have higher rates of service use compared with people who have a home. This includes physical and mental health services, drug and alcohol services and services within the criminal justice system.⁷⁶ Intervening earlier to prevent homelessness would be expected to result in significant cost savings for these public services.

With the right support, many EU citizens will be able to find and sustain employment and move into their own home. Without this additional support, many will struggle to move out of homelessness and could be forced to spend extended periods of time sleeping rough. Preventing this will help to reduce the costs incurred by other public services. Helping people to find and sustain employment will also have wider positive benefits through bringing people into the formal labour market where they will pay taxes and help to fulfil vital jobs in industries currently experiencing labour shortages, including construction and hospitality.

We have estimated the approximate cost of providing this tailored package of support for EU citizens who are sleeping rough. These estimates have been calculated using information provided by Crisis Skylight Croydon, based on the costs and learnings from the MEAS project, which provides a similar programme of support for a small number of EU citizens in Croydon. This provides an indication of the expected cost of delivering this support to EU citizens who are sleeping rough across Britain.

We estimate that the cost of providing this tailored package of housing and

employment support to EU nationals who are sleeping rough would be, on average, £10,052 per person. This includes the cost of providing emergency accommodation, the salary costs of support workers and ESOL teachers, translator costs and the cost of providing rent in advance and deposit payments. Table 2 below provides more information about the estimated cost of each component and further detail is included in the appendix.

The most recent available data on the number of EU nationals who are sleeping rough in Britain is from 2018/19, when there were estimated to be 2,335 people in this position. Whilst post-pandemic data is harder to come by, updated forecasts suggest that, over the pandemic, there is likely to have been an increase in the number of EU nationals who are sleeping rough, with the estimated number of people in this position now standing at around 3,190. We therefore estimate that it would cost a total of approximately £32 million to provide this support to all EU nationals who are currently sleeping rough and need support.

It is important to note that this is intended to provide an indication of the approximate cost of providing this package of support, based on currently available data, and not all EU citizens who are rough sleeping will necessarily need to access this support. For example, EU citizens who have settled status do not have restrictions on their access to welfare benefits so are likely to need less intensive support as they will be entitled to mainstream support services to help them move out of homelessness. However, as accurate data showing what proportion of EU citizens who are rough sleeping have settled status is not available we have

76 Culhane, D. P. (2008) 'The Costs of Homelessness: A Perspective from the United States', *European Journal of Homelessness*, 2(1), 97-114; Pleace, N., Baptista, I., Benjaminsen, L. and Volker BuschGeertsemal (2013) *The Costs of Homelessness in Europe: An Assessment of the Current Evidence Base*. Brussels: FEANTSA; Benjaminsen, L. and Andrade, S.B. (2015) 'Testing a Typology of Homelessness Across Welfare Regimes: Shelter Use in Denmark and the USA', *Housing Studies*, 30(6), 858-876.



not been able to take this into account when reaching these cost estimates.

We have estimated that on average each individual will require six months of higher intensity support and emergency accommodation, followed by six months of lower intensity support after they have gained employment and moved into their own long-term home. The high intensity support would consist of help to find employment, wrap around support with any other challenges individuals are facing and ESOL classes. This continued support is important to ensure that people can sustain their employment and housing and can get help with any issues that arise as they are settling into their new job and home. These estimates are based on the experience of similar services that have supported EU citizens to move out of rough sleeping, including the experience of local authorities providing support using funding provided as part of the suspension of derogation for EU citizens and the experience of Crisis services like the MEAS project in Croydon.

The support provided through this programme is designed to be flexible to the needs of the individuals, and some people may need more support than this whereas other individuals with less complex needs or who don't have any language support needs, are likely to require less support. These estimates represent the average cost of providing support to an individual.

During the pandemic, some local authorities and homelessness services were able to use the funding provided as part of the Covid-19 response to support EU nationals in emergency accommodation to find employment as a route out of homelessness. The funding provided as part of the suspension of derogation, which enabled local authorities to provide limited support for EU nationals who were rough sleeping but who were not eligible for statutory support, also enabled some additional support to be provided for this group for up to three months. However, the majority of the funding supporting these projects was short-term and in most cases has now ended.

Table 2 – Summary of cost estimates for each component of the support package

Component of costs in first 6 months	Cost of provision per person	Total cost per person
Cost of providing emergency accommodation	£200 per week/£867 per month	£5,202
High intensity support (20 hours a month)	£15 per hour/£300 per month	£1,800
Translator costs (5 hours a month)	£45 per hour/£225 per month	£1,350
Components of costs in second 6 months		
Low intensity support (5 hours a month)	£15 per hour/£75 per month	£450
Rent in advance and deposit	£1,250 one off	£1,250
Total cost per person over 12 months		£10,052
Total cost for all EU nationals who are rough sleeping (3,190 individuals)		£32,065,880

A new employment and accommodation programme, led by the Department for Levelling Up, Housing and Communities (DLUHC) in close collaboration with the Home Office and the Department for Work and Pensions (DWP), is needed now to ensure that all EU citizens living in Britain can access the support they need to move out of homelessness.

This new commissioned programme should be provided as part of a joined-up strategy to prevent and end homelessness. Findings from the Kerslake Commission inquiry, which looks at the lessons learnt from the emergency response to rough sleeping during the pandemic, emphasise the limitations of having multiple, separate short-term funding pots. This was found to hamper local authorities' ability to strategically plan and commission effectively and make it difficult for organisations delivering

support to retain skilled workers.⁷⁷ The inquiry also highlighted the limitations of commissioning tailored services in individual local authority areas. Pan-regional and sub-regional approaches may be more effective and allow people in need of support to be referred in from multiple local authority areas.

The costing estimate we have reached is based on the number of EU citizens estimated to be sleeping rough across Britain. While funding provided by the DLUHC would only cover England, EU citizens in Scotland and Wales are also in need of this support and we would expect there would be a Barnett formula consequential to devolved governments from the Westminster Government implementing these commitments. We would like devolved governments to use that to fund the same support.



⁷⁷ The Kerslake Commission on Homelessness and Rough Sleeping (2021) *When We Work Together – learning the lessons: Interim report, July 2021*

Conclusion

No one should become homeless because of their immigration status and having an immigration system that works together with housing and welfare policies designed around a shared goal of ending homelessness is the most effective way of ending homelessness for good.

In our society what affects one of us affects all of us. Support to help prevent and end homelessness should be provided on the basis of need, and not on the basis of where someone was born. Our research shows that the risk of experiencing some of the worst forms of homelessness for EU nationals in Britain is virtually double the risk for the population as a whole. For rough sleeping, the risk is even greater with EU nationals estimated to make up 15 per cent of the total number of people rough sleeping across Britain.

The drivers of homelessness for EU citizens are varied and complex. While some factors mirror those experienced by the general population, they are compounded by restrictions that limit EU nationals' access to support. In many cases, this means that when people find themselves in challenging circumstances, whether because they've experienced a loss of income or are forced to move because of a relationship breakdown, they are left without an adequate safety net and are pushed into homelessness as a result.

Losing a job, struggling to find secure and adequately paid work and a lack of income were all critical factors in the situation of EU nationals experiencing rough sleeping or other severe forms of homelessness. When faced with these issues, many EU citizens were unable to get help with their housing difficulties as a result of rules restricting EU citizens' access to support. Others should have been eligible but struggled to access support due to language barriers or difficulties finding the right evidence to prove their eligibility.

Over the long-term, structural changes are needed to help overcome the systemic barriers that make it harder for some EU citizens to access the support that would help to prevent them from becoming homeless in the first place and make it easier for them to move out of homelessness if it does happen. In the short-term there are some key interventions that would offer immediate help to support those who are currently rough sleeping to move out of homelessness and into a safe and stable long-term home.

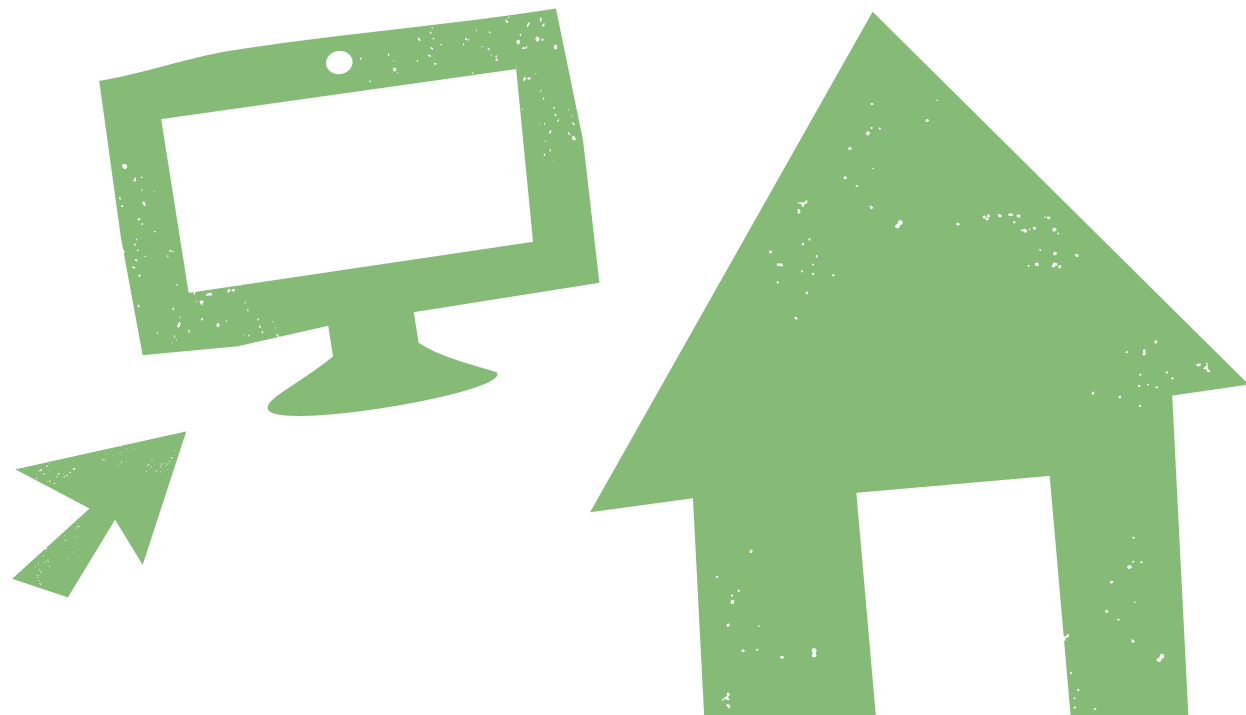
Struggling to find formal employment and relying on insecure, exploitative work that doesn't pay enough to cover housing costs is a common experience for many EU citizens who have experienced homelessness in Britain. Without a safety net to fall back on in difficult times, too often this can leave people stuck in a cycle of homelessness, moving between different poorly paid, often exploitative jobs that will never pay enough to allow someone to move into a proper home. But with the right support, we can help people break this cycle.

Everyone In was a landmark initiative from the Government and provided a critical first step out of homelessness for many people who had previously been excluded from most homelessness support. Yet as the pandemic has continued not everyone has been able to get help to move out of homelessness. Too many EU citizens remain stuck in emergency accommodation or forced to sleep rough with little hope of being able to move out of homelessness.

Crisis is calling on Government to provide a tailored package of employment and housing support for

EU citizens who are experiencing or at imminent risk of rough sleeping, and who are currently excluded from other support services. This will help to ensure the progress made during the pandemic is not lost and everyone sleeping rough has a route out of homelessness and into a long-term home. It will also be critical to helping the Westminster Government to meet its manifesto commitment to end rough sleeping by 2024.

We can make sure that protection from homelessness, exploitation and destitution is there for everyone who has made their home in Britain. Intensive, tailored support programmes are likely to be needed for other groups of people who have made Britain their home, but who find themselves facing homelessness and excluded from support because of their immigration status. Broader changes are also needed to make sure people have access to the right support at the earliest possible time, preventing people from being pushed into homelessness in the first place. Going forward, this must form a critical part of the Government's strategy to end rough sleeping.



Appendix 1:

Research context

Crisis commissioned Heriot-Watt University and IPPR to conduct research exploring the scale and experiences of homelessness among EU citizens living in Britain. The research aimed to reach an estimate of the current scale of homelessness among EU nationals across England, Scotland and Wales, broken down by Crisis' core homelessness definition⁷⁸, and to understand the causes and impacts of homelessness for this group. Core homelessness captures some of the most severe and immediate forms of homelessness, including people: sleeping rough; staying in places not intended as residential accommodation, such as cars, tents, boats and sheds; living in homeless hostels, refuges and shelters; placed in unsuitable temporary accommodation, such as B&Bs, hotels and out of area placements; and sofa surfing.

In recent years, Crisis services have been working with a growing number of people originally from outside the UK who are being pushed into homelessness here. This includes a significant number of EU citizens

who face restrictions on the services and support they can access, and as a result face significant challenges to moving out of homelessness.

Although we know that significant numbers of EU citizens experience homelessness in Britain, understanding of the specific causes of homelessness among this group is limited due to a range of factors, including gaps in the data collected and the lack of visibility of homeless individuals in overcrowded households. This means that higher levels of 'hidden homelessness' among some groups, including EU citizens, may have gone unnoticed.

There are a small number of studies that have looked specifically at homelessness among EU citizens. A study looking at the experience of Roma people rough sleeping in the City of Westminster found that language difficulties, low knowledge of the UK welfare system, limited legal rights to benefits and limited outreach support contributed to homelessness among this group.⁷⁹ Another study of Eastern Europeans in Edinburgh found

that households end up sacrificing adequate housing conditions when faced with other financial demands.⁸⁰ One of the most recent studies on the rights of homeless EU citizens was conducted by the Public Interest Law Centre, drawing on analysis of data from advice, casework, and litigation and focus groups with support organisations. The research highlighted that factors driving homelessness included: progressive restrictions on EU citizens' access to benefits; administrative barriers and discrimination in the private rental sector; unfamiliarity with rights and entitlements; and language difficulties and limited access to interpreters.⁸¹

The research conducted by IPPR and Heriot-Watt University for this project builds on these findings and provides a comprehensive picture of the causes and impact of homelessness among EU citizens across Britain. When we commissioned the research EU citizens' rights in the UK were changing as a result of Brexit, and homelessness services were concerned that this could further compound the already precarious circumstances EU citizens often find themselves in.⁸² This uncertain policy environment, and the lack of reliable data and evidence on the scale, causes and impacts of homelessness among EU citizens, made it particularly important to understand the characteristics and support needs of EU citizens experiencing homelessness, in order to appreciate the potential impact of new changes to their entitlements.

Methodology

The research team used a range of sources and methods to gather the evidence needed to meet these aims and build a much fuller picture of the experience of homelessness among EU citizens living in Britain. This included:

- A review of relevant literature from the last 20 years, providing key background to the emerging challenges with homelessness facing EU citizens in Britain in the years before, leading up to, and after Brexit.
- Developing a model to estimate core homelessness numbers for EU nationals, using an approach similar to that used in the most recent national estimates of core homelessness for England as published and discussed in the *Homelessness Monitor: England 2021*.
- Conducting targeted surveys in a limited number of local authority areas where there were indications of significant EU populations, including people apparently experiencing housing or homelessness difficulties. The case study areas selected aimed to represent the three countries of Britain and to include mixed urban-rural areas as well as major cities.⁸³ The survey asked about people's homelessness experiences,

78 See Bramley (2017) *Homelessness projections: Core homelessness in Great Britain*, London: Crisis. https://www.crisis.org.uk/media/237582/crisis_homelessness_projections_2017.pdf and Fitzpatrick et al (2021), *The Homelessness Monitor: England 2021*, ch.5 www.crisis.org.uk

79 Felja, D. and Greason, L. (2016) *Rough sleeping Roma in the City of Westminster*. Roma Support Group and St Mungo's

80 Serpa R (2018) *Choice, Constraint and Negotiating Housing Systems. Understanding Homelessness in the US and UK*. I-SPHERE, Heriot-Watt University

81 Morgan, B. (2021) *Still here: Defending the rights of homeless EU citizens after Brexit and Covid-19*. London: Public Interest Law Centre

82 Boobis, S., Jacob, R., and Sanders, B. (2019) *A Home For All: Understanding Migrant Homelessness in Great Britain*. London: Crisis

83 The case study areas were: Central and West London; Haringey and Enfield; Coventry; Manchester-Salford; Hull; Newport-Cardiff; and Fife, Aberdeen and Aberdeenshire.

and included a detailed set of questions focused around a set of causes likely to lead to homelessness, including both structural and individual causes. It also included key questions about when, why and with whom the respondents came to the UK, their preference and expectations for remaining in UK for the future, and their current status in respect of the EU Settlement Scheme. In total, approximately 280 survey responses were received across the case study areas.

- An additional survey, using the same questions, conducted using a Respondent Driven Sampling (RDS) technique, a network-based approach which invites survey respondents to recruit their contacts to participate in the survey. This focused on the Polish population in Luton and 300 survey responses were received.

- Undertaking in-depth interviews with 28 EU citizens experiencing housing difficulties and homelessness to develop a stronger picture of the circumstances and events that led to their homelessness, and the beginnings of pathways out of homelessness.

The research was originally commissioned in late 2019 and was intended to be a one-year project. However, the onset of the Covid-19 pandemic and lockdown restrictions in March 2020 led to the postponement of the fieldwork and a redesign of the approach to conducting the survey and interviews. The fieldwork took place six to nine months later than originally planned and was primarily conducted between January and June 2021.



Appendix 2

Approximate cost of providing this package of support

We have estimated the approximate cost of providing this tailored package of support for EU citizens who are sleeping rough. These estimates have been calculated using information provided by Crisis Skylight Croydon, based on the costs and learnings from the MEAS project, which provides a similar programme of support for a small number of EU citizens in Croydon. This provides an indication of the expected cost of delivering this support to EU citizens who are sleeping rough across Britain.

We estimate that the cost of providing this tailored package of housing and employment support to EU nationals who are sleeping rough would be, on average, £10,052 per person. This includes the cost of providing emergency accommodation, the salary costs of support workers and ESOL teachers, translator costs and the cost of providing rent in advance and deposit payments.

During the first six months of support, high intensity support will consist of help to find employment, wrap around support with any other challenges individuals are facing and ESOL classes. On average, this will consist of 20 hours of support a month (at a cost of £15 per hour per person supported), of which a translator will be required for five hours (at a cost of £45 per hour per person supported). Upon finding employment and housing we assume that most individuals will continue to require support but at a lower level, falling to an average of five hours of support a month (at a cost of £15 per hour per person supported). Additionally, we assume that individuals will require support to cover their rent in advance and deposit payments, at an average cost of £1,250.

Table 2 – Summary of cost estimates for each component of the support package

Component of costs in first 6 months	Cost of provision per person	Total cost per person
Cost of providing emergency accommodation	£200 per week/£867 per month	£5,202
High intensity support (20 hours a month)	£15 per hour/£300 per month	£1,800
Translator costs (5 hours a month)	£45 per hour/£225 per month	£1,350
Components of costs in second 6 months	Cost of provision per person	Total cost per person
Low intensity support (5 hours a month)	£15 per hour/£75 per month	£450
Rent in advance and deposit	£1,250 one off	£1,250
Total cost per person over 12 months		£10,052
Total cost for all EU nationals who are rough sleeping (3,190 individuals)		£32,065,880

The most recent available data on the number of EU nationals who are sleeping rough in Britain is from 2018/19, when there were estimated to be 2,335 people in this position. Whilst post-pandemic data is harder to come by, updated forecasts suggest that, over the pandemic, there is likely to have been an increase in the number of EU nationals who are sleeping rough, with the estimated number of people in this position now standing at around 3,190. We therefore estimate that it would cost a total of approximately £32 million to provide this support to all EU nationals who are currently sleeping rough and need support.

It is important to note that this is intended to provide an indication of the approximate cost of providing this package of support, based on currently available data, and not all EU citizens who are rough sleeping will necessarily need to access this support.



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we will end
homelessness