



Chartered  
Institute of  
Housing



THE JOINT COUNCIL  
*for* THE WELFARE  
OF IMMIGRANTS

Rt Hon Suella Braverman KC MP, Secretary of State for the Home Department

The Rt Hon Michael Gove MP, Secretary of State for Levelling Up, Housing and Communities

2 Marsham Street

London SW1P 4DF

24<sup>th</sup> May 2023

Dear Secretaries of State

### **People seeking sanctuary excluded from vital housing safety regulation**

We are writing to express our organisations' extreme concern about the regulations being considered by Parliament that would remove the licensing requirements for houses in multiple occupation (HMOs) used as asylum accommodation.

We are aware that the Home Office promises to repeat the requirements that normally apply in licensing via its contracts with accommodation suppliers; however, experience with enforcement of conditions in existing contracts indicates that this is very unlikely to be sufficient or comprehensive given the scale of accommodation required.

We are particularly concerned that the potential combination of overcrowding, sharing of facilities such as kitchens and potentially lax enforcement of gas and electrical safety standards poses a severe fire risk (these factors appeared to be behind the recent tragic fire in Tower Hamlets). Given that much of the accommodation is likely to be in flats or in terraced housing, the risk applies both to the property itself and to neighbouring homes. The risk is, of course, enhanced by the very real possibility of arson attacks.

As well as safety issues, the potential for increased use of substandard buildings could affect the health and wellbeing of people seeking sanctuary, for example by removing the standards that apply to the kitchen and bathroom facilities required in relation to numbers of occupants. Limited or no controls over room-sharing may well lead to conflicts between occupants, and to safeguarding dangers. Occupants could be condemned to near cell-like conditions in rooms which (for example) could have no windows.

We are also concerned that people seeking sanctuary will potentially be placed into overcrowded rooms in overcrowded housing in neighbourhoods with existing high concentrations of hostel-type accommodation, with potential ramifications for community inclusivity and the safety of people seeking sanctuary.

Existing landlords and temporary accommodation providers will be incentivised to switch their properties away from their existing uses to asylum accommodation, which may be more profitable. This could include properties which may not have met HMO standards previously. As well as leading to an increase in substandard properties, this could exacerbate local housing and

homelessness pressures, with the potential for people seeking sanctuary to be blamed for causing them.

As contracts for asylum will be managed by the Home Office, councils will be much less likely to directly redress poor standards or safety issues. As a result, enforcement action may not take place or could be much slower than under current local HMO licensing arrangements. Councils will no longer receive HMO licensing fees from properties used for asylum accommodation, drastically reducing the funds available for enforcement work.

It is worth noting two important elements of HMO licensing:

1. The reason for licensing is that, over decades, HMOs have been shown to be the properties posing greatest risk to health and safety – especially death from fire. As a bare minimum, if the plans go ahead, additional fire safety requirements (over and above those for non-multi-occupied dwellings) should be on the face of the instrument to show explicitly how fire risk will be minimised.
2. Licensing under Part 2 powers is pre-disclosure: councils know where these properties are before they are let, so they can be checked for safety before any incident occurs. Part 1 powers (which local authorities can still use) are only effective if they know where HMOs are; they are dependent on complaints which may not be made (especially given that the occupants are people recently arrived in the UK, who are likely less equipped to navigate local authority complaints systems).

We appreciate the need to resolve accommodation issues resulting from the backlog of asylum claims. However, we do not believe that removing HMO licensing controls is the way to proceed. In summary, our concerns are at two levels. One is the danger of failing to liaise with local authorities and the removal of local controls in situations rife with potential problems for community relations. The second, and even more important, is the potential effect on the safety and wellbeing of people seeking sanctuary. The relaxation of standards contrasts sharply with the government's efforts to enhance building safety more generally and to tackle poor conditions in the private rented sector, which we strongly support.

We note that the strain on the asylum accommodation system is partly the result of most people seeking asylum being banned from working, as well as excessive delays in asylum decision-making. The Home Office should address these problems rather than deny people seeking sanctuary the basic accommodation rights that should be afforded to all tenants.

We therefore urge you to abandon the planned removal of HMO licensing requirements, and instead to redouble efforts to ensure that asylum accommodation is safe, healthy and secure.

Your sincerely,

**Gavin Smart**

Chief Executive, Chartered Institute of Housing, on behalf of the following 141 organisations

Dr C Wooff, Joint leader, **ACAP (Ashton Churches Asylum Project)**

Duncan McAuley, CEO, **Action Foundation**

Rosie Boyd, Refugee Integration Officer, **African Rainbow Family**

Steve Valdez-Symonds, Refugee and Migrant Rights Programme Director, **Amnesty International UK**

Giles Peaker, Partner, **Anthony Gold Solicitors LLP**

Anna Rudd, Interim Director, **ASSIST Sheffield**

Ewan Roberts, CEO, **Asylum Link Merseyside**

Mabli Jones, Deputy Director, **Asylum Matters**

Kat Lorenz, Director, **Asylum Support Appeals Project**

Mark Goldring, Director, **Asylum Welcome**

Nadia Hussain, Liaison Worker, **Aylesbury Women's Aid**

Pierre Makhoul, Legal Director, **Bail for Immigration Detainees**

Emma Hawthorne, Chair, **BIRCH (Birmingham Community Hosting)**

David Brown, Chair, **Birmingham City of Sanctuary**

Mandy Ross, Refugee Support Group member, **Birmingham Progressive Synagogue**

Barbara Forbes, Local lead Birmingham, **Birmingham Schools of Sanctuary**

Dr. Wanda Wyporska, CEO, **Black Equity Organisation**

Ros Holland, Chief Exec, **Boaz Trust**

David Thomas, Legal Officer, **Brighton & Hove Housing Coalition**

Laura Chester, Host Network Manager, **Bristol Hospitality Network**

Hana Cogingsford, Solicitor, **Bristol Law Centre**

Qerim Nuredini, Chief Executive Officer, **Bristol Refugee Rights**

Caroline Gregory, Director, **Calais Action**

Amber Ray, Communications and Engagement Lead, **Calderdale Valley of Sanctuary**

Catharine Walston, Trustee, **Cambridge Refugee Resettlement Campaign**

Eleanor Brown, CEO, **CARAS**

Central England Law Centre, Central England Law Centre, **Central England Law Centre**

Tom Martin, Director, **City of Sanctuary Sheffield**

Sian Summers-Rees, Chief Officer, **City of Sanctuary UK**

Toni Soni, Centre Director, **Coventry Refugee and Migrant Centre**

Sally Hyman, Trustee and founder, **Cribs International**

Matt Downie, CEO, **Crisis**

Fran Wood, Chair of DAR, **Darlington Assistance for Refugees**

Steve Cooke, Chair, **Derbyshire Refugee Solidarity**

Alex Vessis, CEO, **Devon and Cornwall Refugee Support**

**Disrupt Foundation, ,**

Karuna, National health advisor, **Doctors of the world**

Penny Hardcastle, Teacher, **Farnham help for refugees**

Joanne Watters, Head of Community Projects, **Father Hudson's Care**

Alan Strang, Volunteer, **For Refugees Birmingham**

Amber Bauer, CEO, **forRefugees**

Anna Pincus, Director, **Gatwick Detainees Welfare Group**

Dan Wilson Craw, Acting Director, **Generation Rent**

Jason Tetley, Director, **Greater Manchester Law Centre**

Stephan Morrison, Researcher, **Groundswell**

Rose Nickolds, Housing and Destitution Caseworker, **Hackney Migrant Centre**

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Madeleine Evans, General Manager, **Haringey Migrant Support Centre**

Lucy Nabijou, Coordinator, **Haringey Welcome**

Polly Gifford, Co-Chair, **Hastings Community of Sanctuary**

Jane Grimshaw, Convener, **Hastings Supports Refugees**

Kerry Smith, Chief Executive, **Helen Bamber Foundation**

Angus Clark, Chief Executive, **Herts for Refugees**

Rosie Carter, Director of policy, **HOPE not hate**

Phil Davis, Director, **Hope Projects**

Simon Mullings, Co-chair, **Housing Law Practitioners' Association**

Sarah Teather, Director, **Jesuit Refugee Service UK**

Lisa Norcross, Project Manager, **Kairos Housing**

Sue Willman, Supervising Solicitor, **King's College Legal Clinic**

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Jenny Willison, Trustee/Secretary, **Leeds Destitute Asylum-Seekers Support**

Pete Hobson, Chair, **Leicester City of Sanctuary**

Rosario Guimba-Stewart, CEO, **Lewisham Refugee and Migrant Network (LRMN)**

Catherine Pellegrino, Senior Policy Officer, **Maternity Action**

Dr Joanna Dobbin, GP registrar, **Medact**

Sebastian Rocca, Founder and CEO, **Micro Rainbow CIC**

Cllr. Dr. Hosnieh Djafari-Marbini, Co-founder, **Migrant Champions Network**

Lara Parizotto, Co-Director, **Migrant Democracy Project**

Son Olszewski, Caseworker, **Migrants Organise**

Fizza Qureshi, CEO, **Migrants' Rights Network**

Ceri Hutton, Chair, **MigrationWork CIC**

Jane Long, MTVH Migration Foundation Committee Member, **MTVH Migration Foundation**

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Jean Demars, Director, **Public Interest Law Centre**  
Shameem Ahmad, CEO, **Public Law Project**  
Nick Beales, Head of Campaigning, **RAMFEL**  
Anna Jones, CEO & Co-founder, **RefuAid**  
Tim Naor Hilton, Chief Executive, **Refugee Action**  
Sarah Fenby Dixon, Trustee, **Refugee Aid Network**  
Shari Brown, Partnership and Development Manager, **Refugee and Migrant Centre (West Midlands)**  
Shelley Braddock- Overbury, Senior Caseworker, **Refugee Asylum Seeker Migrant Action (RAMA)**  
Ruhi Akhtar, CEO / Founder, **Refugee Biryani & Bananas**  
Enver Solomon, CEO, **Refugee Council**  
Nick Harborne, CEO, **Refugee Support Group Berkshire**  
Nese Davidson-Birch, Supported Lodging Lead, **Refugee Welcome Homes**  
Alison Moore, CEO, **Refugee Women Connect**  
Mandy Littlewood, Project manager, **Refugees & Mentors CIC**  
Sarah Crowther, Director, **Refugees in Effective and Active Partnership (REAP)**  
Jeremy Thompson, Manager, **Restore - a project of Birmingham Churches Together**  
M El Sayed, Research and Advocacy Officer, **Rethink Rebuild**  
Caroline Coombs, CEO, **Reunite Families UK**  
Derek White, Trustee, **Rochdale Action with Destitute Asylum seekers and Refugees**  
Polly Neate, CEO, **Shelter**  
Elizabeth Morgan, Trustee/Treasurer, **Side by Side Refugees**  
patrick marples, CEO, **South West London Law Centres**  
Lucy Parker, Homeless Advice Worker, **Southwark Day Centre for Asylum Seekers**  
Robert Rush, Garden coordinator, **Southwark Day Centre for Refugees and Asylum Seekers**  
Rebecca Bahar, Solicitor, **Southwark Law Centre**  
Liz Needham, Chair of Trustees, **St Albans for Refugees**  
Abigail Martin, Manager, **St Chad's Sanctuary**  
Becky Hellewell, Head of Support & Immigration, **St. Augustine's Centre**

Stephanie Neville, Project Manager, **Stories of Hope and Home**

Emily Crowley, Chief Executive, **Student Action for Refugees (STAR)**

Rachel Balabanoff, Coordinator, **The Care Rights Project**

Alexandra Lopoukhine, Interim Executive Director, **The Joint Council for the Welfare of Immigrants**

Jane Williams, Founder, **The Magpie Project**

Alex Kempton, Director of Operations and Campaigns, **The Refugee Buddy Project**

William Gomes, Director, **The William Gomes Podcast**

Susanne Schuster, Publicity and Events volunteer, **Thousand 4 £1000**

Sue Hirschler, Volunteer, **Thousand for £1000**

Susie Dye, Grants Manager, **Trust for London**

Laura Coyle, Partner and Housing Solicitor, **Turpin Miller LLP**

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Andrew Jackson, Chief Executive, **Upbeat Communities**

Mel Steel, Director, **Voices in Exile**

Marcie Winstanley, Volunteer Coordinator, **West End Refugee Service**

Jason Hussein, Head of Advocacy and Support, **West End Refugee Service**

Joanne MacInnes, Director, **West London Welcome**

Ted Britton, Chair of Trustees, **West Yorkshire Destitute Asylum Network (WYDAN)**

George Reiss, Vice chair, **Wolverhampton City of Sanctuary**

Alphonsine Kabagabo, Director, **Women for Refugee Women**

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Jo Cobley, CEO, **Young Roots**

Valerie Clark, Director, **Youth Legal**