

## **Response to the Mayor's vision: 'A City for all Londoners'**

**11 December 2016**

### **Migrants' Rights Network**

#### **INTRODUCTION**

We welcome the Mayor's vision to create a city for all Londoners with fairness and social justice at its heart.

To achieve it we strongly believe that the Mayor should urgently work with migrant and refugee rights organisations (MRCOs) to devise an action plan that provides physical and human infrastructure/resources to protect the rights of migrants and refugees and mitigate against the impacts of '*hostile*' restrictive immigration laws and Britain's EU exit.

It is important that the Mayor recognises in his introduction that already there are lots of strong and diverse communities existing and flourishing and they should be supported rather than conveying a feeling that there is a need to build strong communities.

The Health inequalities strategy should be based on a mapping or review of the current health issues that affect marginalised or vulnerable groups, seeing as they will change over time, and as new communities/ groups establish themselves within London. The review would be the initiator to developing a robust a strategy to reduce these inequalities.

We would like to encourage the Mayor to consider developing a city access system that gives migrants access to public services. We strongly believe this will address some of the deep inequalities that are caused as a result of the restrictive immigration policies developed over the last five years and will continue to affect many Londoners. This power could be part of the devolution agenda.

#### **PART 1: ACCOMMODATING GROWTH**

We are concerned that the housing section only makes reference to accessibility and 'affordability' (a rather fraught term due to land values) but fails to address the needs of London's ethnically diverse communities to reverse the acute housing inequality they experience. [Runnymede Trust research](#) shows that all ethnic minority groups experience persistent housing inequality in London and are more likely to live in

overcrowded housing compared to the White British population. Between 2001 and 2011 for example 40% of Black African, 36% of Bangladeshi and 32% Pakistani people lived in overcrowded housing. Housing policy must recognise the need to house extended families in larger housing units therefore we recommend that the word **‘appropriate’ is added** alongside **‘accessible and affordable housing’**.

We welcome the Mayor’s recognition of the cultural needs of the LGBT community. However, the framing of ‘cultural capital’ is limited to activities that are primarily commercial and focus on tourists or ‘trendy’ Londoners, which can potentially lead to the *‘sterilisation’* of the city that this section states that it aims to avoid.

The language should be inclusive of the heritage and cultural needs of all Londoners recognising the need to protect and enhance infrastructure that caters for existing citizens and newcomers alike. Clear reference should be made to the ethnic diversity and different cultural traditions, that coexist in every London neighbourhood like Asian, African, Arab and Latin American and contribute to London’s fame of a ‘global metropolis’. The faith aspect should be included in this section as it is particularly relevant to migrant and refugee communities living across the capital.

We would also like to see included in this section community spaces like places of worship, safe spaces for vulnerable people like sheltered housing or a refuge, community halls, community theatres, grassroots musical venues, youth clubs, supplementary schools, and social centres.

The ‘infrastructure for people and communities section’ fails to mention London’s ethnic diversity, which is what makes the city’s culture so diverse. Add **ethnicity** in the sentence so that it reads as *“people with different ethnicities, perspectives and experiences, of different ages and backgrounds ...”*

We also welcome the Mayor’s commitment to increase provision of educational and community-based health care facilities but it needs to extend his focus of the target population to include everyone particularly as the most vulnerable people in society tend to be refugees, asylum seekers, migrants or BAME communities especially when it comes to acute mental health problems. As part of the social infrastructure listed in this section it should also **include human infrastructure within health care facilities (like trained interpreters and advocates)** that impacts on the quality of care and costs if it’s not provided as identified by the [BMA \(British Medical Association\)](#). We feel strongly that it is crucial to include this in the vision document as, in our view, it provides a sound start in developing the Mayor’s Health Inequalities Strategy.

Provision of community-based health care facilities should not be used as a substitute for existing good quality health care facilities in order to make up for the recent public fund cuts. Planning policy should seek to protect and enhance mixed health care facilities (i.e. hospitals, maternity wards, mental health facilities, specialist clinics as well as community-based health care facilities) to be able to offer good quality services that cater for all the health issues and needs of London's diverse communities.

We welcome the Mayor's commitment to designing a city that supports and encourages social integration. We would like a clear 'social integration' definition that at its heart includes **universal access to public services** for all Londoners irrespective of immigration status. This is pertinent in the current Brexit hostile environment against those who look and sound different, particularly if the Mayor wants London to continue to be seen as a welcoming and 'open' global city. Finally this section should include a statement on providing safe spaces for the homeless and other vulnerable groups of people.

We support increasing the capacity of public transport but we believe this has to be linked to affordability and go beyond the tube to include more environmentally friendly modes of transport with good links across the capital. Low income households (working in retail, cleaning, and hospitality or catering industries) travel into central London from zones beyond 3-6 due to the lack of affordable housing in central London. Planning policy enablers such as the Lifetime Neighbourhoods should be used to help reduce the need to travel far to access work or public services. We have evidence that bike awareness initiatives are a good method of encouraging migrant women or older people to cycle in order to improve their health and well-being so we would like to encourage creating more safe cycling routes and resourcing such initiatives.

## **PART 2: HOUSING**

We welcome the Mayor's concern about the rising numbers of rough sleepers but this section attributes homelessness to welfare changes. In a city where one third of the total population is foreign born it is important to recognise that homelessness can be caused by recent complex immigration laws that now permeate every aspect of life including housing, health, employment, education, banking or driving, forcing migrants into destitution. For example, the Immigration Act 2016 brought into force new criminal offenses, against landlords via the 'Right to Rent' scheme. A 2015 JCWI (Joint Council for the Welfare of Immigrants) evaluation of a 'Right to Rent' pilot scheme that was rolled out in 5 local authorities in the West Midlands found that landlords would discriminate against people with complicated immigration status and BAME people who were unable to provide documentation immediately.

The Mayor should urgently work with Migrant and Refugee rights organisations (MRCOs) to devise an action plan that provides physical and human infrastructure/resources to protect the rights of migrants and refugees and mitigate against the impacts of '*hostile*' restrictive immigration laws, such as the 'right to rent' scheme. As the majority of migrants live in private rented homes, it is important to look at rent levels and security of tenure that seem to be the biggest two challenges for migrants. In the context of Brexit this becomes urgent as more and more EU settled migrant communities will likely come under threat.

### **PART 3: ECONOMY**

In this section, the Mayor links opportunity and fairness with the tensions of globalisation outlining some of the challenges most Londoners face but it lacks specifics about some of the mechanisms that will redress the rising inequalities gap. We would like to see social indicators added to the GLA's evaluation framework when measuring the impact of large scale developments that displace so many communities in London, particularly the most vulnerable groups. Social impact audits should become a planning requirement for major developers to conduct at pre-planning application stage.

We are glad that a new equalities framework will be central in producing the Mayor's economic development strategy. We urge the Economic Fairness Team to develop both documents in a timely and genuinely collaborative process with communities, civil society and businesses so that any plans are rigorously assessed and do not continue to create the huge inequalities we have seen in recent years.

We support the Mayor's commitment to lobby central government in order to create an immigration system that keeps the city's economy open. However, we are deeply concerned that current public discourse on immigration has stripped migrants of their humanity and rights as they are only mentioned in relation to protecting the UK or London economy and merely presented as a commodity for exchange. Migrants bring many more benefits to a society than just meeting workforce needs and this needs to be acknowledged and respected.

Politicians from across the political spectrum have failed to include the migrants' human dimension, which has led to normalising discrimination against ethnic minorities resulting in an unprecedented rise in hate crimes. We believe the Mayor of a 'global' city like London, is best placed and should use all his powers to redress this imbalance and change the public narrative on immigration. We would like to see a bold and inclusive statement that focuses on the migrants' rights and welfare.

This section needs to list other persistent key factors that lead to Black and ethnic minorities (BME) unemployment such as the 'glass ceiling' that prevent BME people from gaining better employment opportunities despite having more qualifications than their White British peers.

ESOL courses are welcomed but we stress its provision isn't synonymous to social integration. Helping new migrants remove language barriers and understand the new society is an important step in the integration journey but should not be used to substitute all the other dimensions of integration (i.e. social, spatial, cultural, economic). ESOL should be treated as a tool that is part of a wider integration strategy designed with community development principles to tackle the multidimensional exclusions that migrant communities face.

Finally we propose that the SME section should recognise the unique value of migrant and ethnic minority businesses add to the city's economy and global culture and acknowledge the cost that Home Office (HO) immigration enforcement raids on migrant and ethnic restaurants and other small businesses are having.

Official HO records obtained by MRN for the period of Apr 2013 to Mar 2016 show a total of over £9M fines issued against ethnic businesses across London. Immigration law requires that raids have to be 'intelligence led' and to be supported by evidence. However leaked information from 2014's ['Operation Centurion'](#) showed that the bulk of initial 'intelligence' came from around 50,000 "allegations" per year from "members of the public". The Independent Chief Inspector of Borders & Immigration in a damning report disagreed with HO decisions to raid businesses on two thirds of cases.

There needs to be recognition that certain communities within London are targeted much more aggressively and consistently than others. The Mayor should ensure that BAME businesses and their communities are protected from such infringements, and offered opportunities to thrive and expand under any regeneration schemes.

#### **PART 4: ENVIRONMENT, TRANSPORT AND PUBLIC SPACE**

Inclusive neighbourhoods should be part of lifetime neighbourhoods, providing universal access to services and public goods. Genuinely affordable rents for business premises and free community spaces where people can come together.

## PART 5: A CITY FOR ALL LONDONERS

### **‘A City for all Londoners’ consultation process**

Although we welcome the Mayor’s statement of intent to create a ‘City for All Londoners’ we wish to note the limitations of this initial public engagement approach, which in our view was not inclusive of migrant and refugee communities. Given that migrants and refugees make up a third of London’s population a community participation plan should detail how the migrant and refugee stakeholder groups will be able to actively participate in the next phases of GLA’s consultation process leading up to the adoption of the London Plan.

We value the new appointment of a Deputy Mayor for Social Integration, Social Mobility and Community Engagement and recognise the initial challenges his team faces but hope it establishes a genuine and sustainable participation process for marginalised communities traditionally ignored by City Hall officials.

The Mayor refers to *‘building successful communities where Londoners feel connected with each other’* but lacks any detail throughout of how this will apply to migrants and refugees in the context of the governments *‘hostile immigration system’*. Already established or newly arrived migrants feel unsafe and uncomfortable in London.

The Mayor must use his policing powers to ensure immigration enforcement operations in the streets or businesses of London are conducted within the law. We urge the Mayor to begin a genuine dialogue with migrant and British ethnic minority communities to identify ways he can ameliorate the effects of national policies that continue to create exclusivity and barriers against them, i.e. family migration policy, forcing many vulnerable people to exploitation and destitution.

We emphasise the need for a more collaborative approach between City Hall policy makers and migrant and refugee communities so that development plans and policies are informed by their needs. We are convinced that failure to engage with such grassroots communities will hinder the Mayor’s vision to create an inclusive city and go against his good intentions. Safeguarding the rights of migrants should be part of the Mayor’s devolution negotiations.

We know that active citizenship is easier to achieve through democratic governance rather than volunteering. We would encourage the Mayor to consider what emphasis he can put on corporate social responsibility (CSR), to assist where community development resources are lacking.

We are alarmed that the definition of social integration is vague and fear that in this vacuum City Hall integration policies will be misinformed by partisan publications. For example MRN regards the [Casey review as disappointing](#) as it has missed a good opportunity to address the inequalities that are affecting BME communities. Instead it seems to have targeted specific communities, namely Pakistani and Bangladeshi Muslims, by making statements that are factually incorrect, politicised or negative opinions going against the evidence they are based on.

In the absence of a nationally agreed definition of 'British values' it is difficult to accept that Casey's review provides an accurate picture that can act as a blueprint for developing migrant integration policies.

Finally we strongly urge the Mayor, as part of his devolution agenda, to restore [rights based migrant integration policies](#) recognising that integration is a two way process.