

Free Word Centre
60 Farringdon Rd, Farringdon
London, EC1R 3GA
United Kingdom

www.openrightsgroup.org/
info@openrightsgroup.org
+44 (0) 20 7096 1079

28. April 2022

Direct Communications Unit
2 Marsham Street
London
SW1P 4DF
United Kingdom
correspondence@levellingup.gov.uk

Dear Department for Levelling Up, Housing and Communities,

Open Rights Group (ORG) and our coalition of frontline migrants' rights groups, including Refugee Action, write to express our serious concerns regarding the data practices involved in the Homes for Ukraine Scheme.

We were very pleased to see the establishment of a government scheme in the UK to provide refuge to those fleeing the war in Ukraine. But it is clear that the scheme, as it stands, is not fit for purpose. Instead of placing vulnerable migrants with welcoming hosts, the lack of supervision over the matching of sponsors with refugees has led to serious actual (and potential) harm.

Specifically, we would submit the following questions for your consideration:

1. Hosts must identify someone to be sponsored before registering, and as a result, many have turned to social media to find matches. Predictably, these online venues have therefore become attractive to those wanting to prey on the vulnerable, and instances of harassment/abuse have been reported. This danger has been identified by some groups, who have limited restrictions in place on who they allow to match. Some Facebook groups have now responded to the concerns by linking to websites where suspected criminal activity can be reported, and warning refugees not to share photographs. We would argue that these measures are insufficient in ensuring that the the scheme is a safe one for extremely vulnerable people.

Why is it necessary for a host to have an established relationship with a refugee to register?

2. The UN refugee agency, UNHCR, has [highlighted the need](#) for 'adequate safeguards' and vetting measures to be put in place against the possible exploitation of Ukrainian women, under the United Kingdom's "Homes for Ukraine" scheme. We would argue that this places an extra responsibility on the government to ensure that the settlement process offered is entirely safe, from beginning to end. It is dangerous to leave the pre-registration matching process to be organised by the public and is something that should be within the scope of the main scheme.

Why and when was a decision made not to include the 'matching' stage of the settlement process in the main scheme?

3. After a recent Facebook Group administrator was cited as having to perform nominal checks herself with no support, a government spokesperson [responded](#): "All adults in a sponsor's home, where Ukrainians will be housed, will be subject to Home Office checks before any visa is issued. Adults in the house of a sponsor

will also be required to complete DBS checks, with an enhanced DBS with barred list check for everyone where families are hosting children or vulnerable adults.”

What documentation is available to demonstrate the frequency and quality of these inspections? We would like to request a copy of any such documentation.

4. A large proportion of Ukrainian refugees will have been exposed to some sort of trauma.

Are severely vulnerable people being placed with special consideration? Are hosts sponsoring this category of individuals located where they can easily access appropriate support, and quickly?

5. When designing the scheme, the government left a significant part of the data processing to third parties, including Meta and Palantir.

Did the government consider how effective these platforms were at regulating harmful users/content, and if so did they document this assessment?

Was this assessment included in the Data Privacy Impact Assessment (DPIA)?

Did the government brief Meta and other third parties with recommendations for safeguards to protect the vulnerable, including a content removal policy? Can evidence of these policies be provided?

Has the government allocated any dedicated staff and/or other resources to the identification and removal of non-compliant requests on social media platforms?

Did the government carry out an Equality Impact Assessment, and if so can documentation of this assessment be provided?

6. The government is quoted on its guidance page for councils as stating that “it is exploring how to provide councils with live data on expected arrivals and will work with councils directly on this.”

How will this live data system work, and what data points will it include? Has it been implemented, and if not when was the implementation date?

We thank you for your careful consideration of the above points. We are minded of the urgency of resolving this matter, given the actual and potential harm to those fleeing war that is occurring. We therefore request that you respond to this letter within 7 days.

Yours sincerely,

Open Rights Group

and

Tim Naor Hilton, CEO, Refugee Action