

Report for: Cabinet – 15 November 2016

Item number: 11

Title: Supporting refugees, asylum seekers and unaccompanied asylum seeking children

Report authorised by: Zina Etheridge – Deputy Chief Executive

Lead Officer: Erica Ballmann – Assistant Director, Strategy & Partnerships

Ward(s) affected: All

**Report for Key/
Non Key Decision:** Key Decision (affects all wards)

1. Describe the issue under consideration

1.1. The conflict in Syria has resulted in one of the largest displacement of people in recent history. In September 2015 the British Government announced that the UK would resettle 20,000 Syrian refugees by 2010. Refugees have arrived and will continue to arrive in the UK under different schemes:

- Syrian Vulnerable Persons Resettlement Scheme – resettlement of up to 20,000 Syrians in need of protection;
- Vulnerable Children Resettlement Scheme or ‘Children at Risk scheme’ – announced in April 2016, with the aim of resettling up to 3,000 vulnerable and refugee children at risk and their families from the Middle East and North Africa region;
- ‘Dubs amendment’– this amendment to The Immigration Act 2016 championed by Lord Dubs, provides that the government must make arrangements through local authorities to provide refuge to unaccompanied refugee children who are currently in Europe;
- The Dublin Regulation (604/2013) – establishes the principle that only one EU member state is responsible for examining an asylum application. Whilst not intended for use on the scale required in the current refugee crisis, the Government is being asked to consider children, close family or dependents reuniting to have their asylum claim dealt with together;
- Refugees are also arriving independently of the above schemes and applying for asylum from within the UK.

1.2 This report outlines the support and assistance that is already in place and sets out how Haringey will work with partners, the community and the Voluntary and Community Sectors (VCS) in borough to support refugees.

2. Cabinet Member Introduction

- 2.1 Haringey has a strong and proud history of welcoming asylum seekers and refugees and people who have chosen to re-settle in London. There are generations of people from around the world who have moved here and made Haringey one of the UK's most open and diverse boroughs.
- 2.2 For the Syrian refugees who come to the UK, the level of support they will need to live dignified and independent lives is substantial. The unimaginable horrors that many will have experienced will have left them with serious mental and physical health concerns as a result of psychological distress, trauma and violent abuse. Treatment, for those who need it, will need to include ongoing specialist counselling and support from health services to ensure those individuals make a full a recovery as possible and are able to start rebuilding their lives.
- 2.3 Haringey continues to support individuals and families from around the world who have no recourse to public funds as they are subject to immigration control. Whilst their immigration status is reviewed by the Home Office, we provide them with a roof over their heads, support for their children and other help as they need it. Across London, it is estimated that annual unfunded cost is £50million of support to around 2,500 households in 2014-15. The number of households being supported has increased by about 40% in the last two years.
- 2.4 As Leader of Haringey and as Chair of London Councils, I will continue to bring pressure to bear on the Government to ensure that we have the level of funding necessary to support asylum seekers, refugees and unaccompanied asylum seeking children.

3. Recommendations

Cabinet is asked to:

- a) Note and endorse the response by the Council and local partners to the ongoing humanitarian crisis caused by conflict in Syria by resettling up to 10 Syrian refugee families in Haringey
- b) Note the support that the Council and local partners are providing to asylum seekers, refugees and unaccompanied asylum seeking children through the schemes that are currently in operation;
- c) Delegate responsibility to the Deputy Chief Executive to enter in to an agreement with the Home Office to resettle up to 10 Syrian refugee families in Haringey;
- d) Note that officers will continue to work with statutory partners, VCS organisations, faith and community groups to ensure appropriate support is provided to refugees, asylum seekers and unaccompanied asylum seeking children who resettle in Haringey.

4. Reasons for decision

- 4.1. To set out in a transparent and accountable way, the support that Haringey Council and local partners have been and will provide to anyone resettling in Haringey through the support schemes that currently operate in the UK.

4.2 To set out how we do and will continue to offer asylum seekers, refugees and unaccompanied asylum seeking children a place of safety.

5. Alternative options considered

5.1 The alternative option considered is not to enter into an agreement with the Home Office on the Syrian Vulnerable Persons Resettlement Scheme. Given the significant migration crisis, it is felt that Haringey should continue and enhance the part it plays in the wider London and UK effort to provide assistance.

6. Background and summary information

6.1 Syrian Vulnerable Persons Resettlement Scheme (SVPRS)– Background and Haringey Offer

The SVPRS is part of the UK Government's response to the humanitarian crisis arising from the civil war in Syria, which since its outbreak in 2011 has claimed over 250,000 lives and led to the displacement of over 10 million people. Under the SVPRS the UK has committed to resettling 20,000 Syrian refugees by 2020.

SVPRS enrolls individuals and families identified by the UNHCR at its 'in-region' refugee camps and who are cleared by the Home Office for entry into the UK following security vetting. This means Syrian refugees who have already entered Europe are ineligible for SVPRS.

The scheme prioritises the following 'at-risk' groups:

- 1) women and girls at risk;
- 2) survivors of violence and/or torture;
- 3) refugees with legal and/or physical protection needs;
- 4) refugees with medical needs or disabilities;
- 5) children and adolescents at risk;
- 6) persons at risk due to their sexual orientation or gender identity;
- 7) refugees with family links in the UK.

Refugees who are accepted onto the scheme are known as 'beneficiaries' and granted 'Humanitarian Protection' status in the UK for 5-years from their date of arrival, which entitles them to obtain employment, access public funds and the right to family reunion. At the end of this 5-year period, 'beneficiaries' will be able to apply for permanent residence in the UK or return to Syria – if it is safe to do so.

SVPRS is delivered in two parts. The 'Pre-Arrival' element of the scheme is managed by the Home Office, UNHCR and the International Office of Migration (IOM). It entails all the work needed to enable refugees to migrate to the UK, such as conducting initial medical checks, processing visas and arranging flights.

The 'Post-Arrival' element of the scheme is delivered by volunteer local authorities, which commit to resettling an agreed number of 'beneficiaries' in their local area. Participating councils are responsible for arranging accommodation and providing integration support to 'beneficiaries', according to a set of minimum requirements outlined by the Home Office in

its 'Statement of Requirements' (SoR) attached as Appendix A.

6.2 Resource implications

Local authorities participating in SVPRS can claim Central Government funding totalling £20,500 per-refugee (adult or child) over any 5-year period starting between now and 2020. This tariff is provided via a tapered, per-capita annual payment and is intended to help councils support 'beneficiaries' achieve integration and independence in their new communities:

Funding per person	
Year 1	£8,500
Year 2	£5,000
Year 3	£3,700
Year 4	£2,300
Year 5	£1,000

In addition to the basic amount of funding per individual household member, there will also be additional funding for education costs for children as set out in the table below. The funding is provided in the first year only for children aged between 5 and 18 years old (£4,500) and for children aged 3 to 4 years old (£2,250). This will be paid to the local authority and passed onto schools and is above the funding provided to schools per pupil by the Department for Education. Additional funding is also available in exceptional circumstances.

Syrian Resettlement Programme – Local Authority Settlement 2016/17					
Local Authority	Adult benefit claimant	Other adults	Children 5-18	Children 3-4	Children under 3
Costs	£8,500	£8,500	£8,500	£8,500	£8,500
Education	£0.00	£0.00	£4,500	£2,250	£0.00
Total	£8,500	£8,500	£13,000	£10,750	£8,500

6.3 Funding for Social Care

The Home Office have advised that there is additional funding available for 'high cost' cases where there are circumstances that require additional social care costs. These are assessed on a case by case basis by the Home Office.

Individuals granted Humanitarian Protection Status are not able to claim Personal Independence Payment (PIP) or Disability benefits for the first two years of residency.

6.4 Funding for Primary and Secondary Medical Care

Funding for primary and secondary care will be paid directly to the local Clinical Commissioning Group [CCG] by the Government. CCG's will need to apply for medical care costs per household and can claim £600 per person for primary care costs plus £2000 per person for secondary care costs.

Above and beyond this funding, 'beneficiaries' are entitled to claim benefits. It is expected that this will allow refugees to cover their own cost-of-living, although they will be subject to

statutory limits (such as the Benefit Cap) and conditionality (they will be required to seek employment).

Local authorities will have to absorb the wider costs of resettlement, such as mainstream service provision, and provide any 'top-up' that might be required to cover shortfalls. This is particularly significant in London, where it is unlikely that the Local Housing Allowance received by 'beneficiaries' will be sufficient to cover rents.

It is extremely difficult to project with certainty the full cost implications for local authorities of participating in SVPRS because of the large number of variables involved, including:

- The number and composition of 'beneficiary' households accepted locally;
- The 'contingent' costs arising from unknown and potentially changing levels of 'beneficiary' need;
- The period of time resettled households remain residents of Haringey;
- The degree of independence achieved by adults resettled via the scheme in the local private rented sector.

6.5 Housing

The biggest challenge to delivering SVPRS in London relates to securing affordable and sustainable housing. This is because in designing the scheme Central Government has assumed that housing costs will be fully covered through Housing Benefit payments to 'beneficiaries'.

However, the supply of PRS properties available at Local Housing Allowance (LHA) rates is very low in London as welfare reforms have limited LHA entitlements to the 30th percentile of market rents, and few landlords are willing to let-out properties at such low margins in current market conditions. In addition the 'Overall Benefit Cap' restricts the total amount of benefit that a household can claim, and is being reduced from £26k to £23k in London this autumn. These have created a significant 'rent gap' for private renters receiving LHA.

This means that volunteer Local Authorities in London are having to assume a cost burden when participating in SVPRS, as to secure PRS properties for 'beneficiaries' they are having to pay market rates, which essentially means committing to cover the 'rent gap' on accommodation for the required minimum of 1 year (and potentially for all 5 years of the scheme). Central Government has so far refused to address this issue by providing either higher tariff payments to London Boroughs or allowing variations in LHA allowances. The Home Office's 'Statement of Requirements' makes clear that accommodation for arriving beneficiaries must be both affordable and sustainable.

The table below shows the LHA for Haringey, the average market rents and the resulting shortfall.

Bed Size	Market Rents		Current Local Housing Allowance (LHA)		Annual Variance / Deficit
	Weekly	Annually	Weekly	Annually	
1	£318.00	£16,536.00	£199.68	£10,383.36	£6,152.64
2	£352.00	£18,304.00	£255.34	£13,277.68	£5,026.32
3	£465.00	£24,180.00	£315.12	£16,386.24	£7,793.76
4	£495.00	£25,740.00	£388.65	£20,209.80	£5,530.20
5	£750.00	£39,000.00	£388.65	£20,209.80	£18,790.20

It is occasionally possible to find properties that are nearer to LHA but in those instances, our policy is to pay landlords an incentive and they use some of that to offset charging a lower rent.

Categories of Housing:

The Home Office have categorised the types of households that local authorities can expect to be asked to support as part of this scheme.

Given the current housing crisis and number of people that are already in temporary accommodation; and that we are currently struggling to find 2 and 3 bed units, these categories have been ruled out at this stage (as set out below). However, the Council is more successful in identifying 1 and 4 bed properties and this will be relayed to the Home Office.

The Council also struggles to identify ground floor properties and ones that could be adapted so it would be difficult to properly support households that require this type of accommodation.

With these challenges in mind, we have set out below the households we would be able to support based on the Home Office categories of need.

Category	Household Type	Accept?
1	Non-complex case: those with no special needs or requirements	Yes
2A	Mobility issues: people who are wheelchair users or who have other disabilities including missing limbs or those who have restricted movement	No
2B	Serious Medical: people who require surgery or ongoing medical treatment for life threatening conditions (e.g. cancer, dialysis)	Yes (subject to further discussions with the Home Office)
2C	Psychological: people suffering from mental illness or those where a need for immediate psychological support is specified in the HAP	Yes
2D	Special Education Needs: children with disabilities or learning difficulties	Yes (subject to further discussions with the Home Office)
3	Large Families: family groups made up of 7 or more people	No

6.6 Community engagement and support

Many voluntary and community sector organisations, faith groups, churches and individuals are already contributing towards the relief effort and many already work together in a number of ways to support refugees and migrants once they arrive in this country. This is especially the case where there are established family connections.

The voluntary and community sector in Haringey has significant experience and expertise and could usefully be part of the support planning to facilitate orientation which the scheme outlines.

By working together with partners, including members of local faith communities, there are opportunities to integrate and to optimise community based resources, recognising that these are already stretched from the perspective of some communities in the borough. Importantly, working together with the sector, there will be chances to support existing communities to address and reduce the risk of community tensions and to enable refugees to resettle successfully into Haringey.

The Home Office has also set up the Help Refugees digital register to allow individuals and organisations to pledge support and help which is then shared with the relevant local authority as needed.

6.7 Unaccompanied Asylum Seeking Children (UASC)

Haringey is on the well established 'rota' which manages the support and resettlement of UASC with the Association of London Directors and the London Asylum Seekers Consortium. The majority of London boroughs are part of this coordinated approach to supporting UASC as they arrive in the UK.

The National Transfer Scheme asks that we take 0.07% of our general child population. As at end of October 2016 we are supporting 43 unaccompanied children and have committed to continually supporting and resettling up to the threshold of 0.07% of our general child population.

In recent weeks, many London boroughs, including Haringey, have been part of a coordinated effort to speed up the process of bringing eligible children and young people (who are able to settle in the UK through either the Dublin or Dubs amendment schemes).

On 1st July 2016, the Government launched a new voluntary transfer arrangement, the National Transfer Scheme, between local authorities for the care of unaccompanied children who arrive in the UK and claim asylum.

The aim of the scheme is to encourage all local authorities to volunteer to support Unaccompanied Asylum Seeking Children [UASC] in order to ensure an even distribution across the country, of caring for these children.

The Government is also committed to accommodating those children with no (or distant) family ties in the UK but for whom, after assessment in France, Italy or Greece, it is established as being in their best interests to move to the UK.

6.8 No Recourse to Public Funds (NRPF)

The Immigration Act 1999 provides for families subject to immigration control, being allowed to remain in the UK to live and work, but without access to public funds. This means that these families cannot access social housing or welfare benefits. Often, families find themselves in financial difficulties and unable to meet the needs of their children for food and accommodation.

Such families with children present to the Haringey team seeking support under s17 Children Act 1989. This enables family, subject to a social work assessment, to access accommodation and financial support from the Children and Young People's Service.

Currently there are 43 families with 125 children being supported (as at October 2016).

In terms of resources, there is a budget of £769k allocated but a predicted financial year spend of £1.12m as demand often outstrips the funding available. The budget provides for the accommodation and general support according to need.

6.9 Children arriving for intended family reunification

UK Visas and Immigration (UKVI) are responsible for determining the validity of the family relationship in order for the child to be transferred under The Dublin Regulations. UKVI also run police and immigration checks on the identified relatives. After it has established the identity of the family links of a child arriving from Europe, UKVI will contact the relevant local authority, seeking to give a minimum of 24 hours' notice whenever possible. It is anticipated that most family ties will tend to be wider relatives other than parents – i.e. aunts, uncles, siblings.

It will of course be for the local authority on arrival in the UK (and the local authority in which the family resides) formally to make a judgement in all cases. Given the circumstances and background of all these children it will be important that local authorities consider the likelihood that these children will have a greater need for services, and as such may require a s17 Children Act assessment in order to determine whether they are in need and if so, the nature and extent of those needs and the resources required to meet them. .

It is recognised that some of these children will be deeply affected by their experiences to the extent that family reunification proves unsuccessful despite the support provided under s17 Children Act. In such cases, the local authority will need to decide whether it is in the child's welfare and the circumstances of the individual case, requires the authority to use its powers under s20 Children Act 1989 to safeguard the child.

Where the family is assessed as unsuitable to care for the child, the local authority will need, in the normal way, to make arrangements for the safeguarding of the child.

7. Contribution to strategic outcomes

In our 2015-18 Corporate Plan, we are committed to ensuring that Haringey is a 'fair and equal borough' as well as enabling all children to have the best start in life. We are also committed to ensuring that everyone is able to live long, healthy and fulfilling lives.

Haringey has a long and proud history of welcoming, supporting and re-settling refugees, asylum seekers and unaccompanied asylum seeking children. This decision recognises Haringey's duty as a local authority to promote community cohesion and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

8.1 Legal

Participation in the Syrian Vulnerable Persons Relocation Scheme (SVPRS) is voluntary and is a matter for decision by each local authority. The Home Office has issued requirements of authorities who decide to contribute to the programme and these are set out in Appendix A.

Participation in The National Transfer Scheme is currently being implemented under a transfer protocol which has been in place since 1st July 2016. The protocol reflects the basis of an agreement made between Government, the Home Office and Local Authorities and gives effect to Sections 69-73 of the Immigration Act 2016 in connection with the transfer of responsibility for unaccompanied migrant children between local authorities.

Section 17 Children Act 1989 places a duty on local authorities to safeguard and promote the welfare of children in their area who are in need. A child's needs are identified through an assessment determining the range and level of services required to meet the assessed need.

Section 20 Children Act 1989 imposes a duty on every local authority to provide accommodation for children in need in their area who appear to require accommodation.

These provisions apply to all children in a local authority area regardless of their immigration status.

8.2 Equality

The Council is subject to the Public Sector Equality Duty set out in section 149 of the Equality Act 2010 which obliges public bodies to have due regard, in the exercise of their functions, to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The relevant protected characteristics for the purposes of the Duty are: age; sex; race; sexual orientation; disability; religion or belief; pregnancy and maternity and gender reassignment.

Haringey has a long and proud history of welcoming, supporting and re-settling refugees, asylum seekers and unaccompanied asylum seeking children. This decision recognises Haringey's duty as a local authority to promote community cohesion and

foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.3 Finance

The recommendations of this report raise a number of financial implications. However at this early stage, we do not have sufficient specific information to quantify the impacts.

As detailed in the main body of the report, there are 3 funding streams available to the Council to support the beneficiaries of the SVPRS over the 5 year period:

- i) Support funding of £20,500 per person.
- ii) Additional education funding for education hosts of £4,500 or £2,250 depending on age.
- iii) Additional funding for “high cost” social care.

The support funding of £20,500 per person is to be used to provide the basic support detailed in Appendix A. As detailed in this report, an additional cost to this authority is that it is likely that it will need to subsidise the cost of housing for at least part of the 5 year period.

The one-off funding for education support recognises that schools are funded for statutory schooling in retrospect, based on the previous September’s pupil count. So, the one-off allocation provides an amount of funding, until the child is themselves counted on the next pupil count, thus, influencing the level of Dedicated Schools Grant received by the Council. Early Years funding is based on the actual number of children receiving early years support in a particular term, so this may explain why only half of the statutory schooling rate is applied (£2,250 compared to £4,500).

The Council does not yet have information on the number and ages of individuals in each family nor their support needs or timing of being assigned to this authority. The likely costs or income associated with the SVPRS cannot, therefore, be reliably estimated. The existence of a package of support through the SVPRS scheme, however, provides some assurance that potential additional costs incurred by the Council do have some funding to cover them, with the added assurance that there is an option for the Home Office to provide additional support for “high needs” cases.

9. Background documents

Guidance for Local Authorities and Partners on the Syrian Refugee Resettlement programme:
<https://www.gov.uk/government/publications/syrian-vulnerable-person-resettlement-programme-fact-sheet>

Interim National Transfer Scheme for unaccompanied asylum seeking children
<https://www.gov.uk/government/publications/unaccompanied-asylum-seeking-children-interim-national-transfer-scheme>

Appendix A

SYRIAN VULNERABLE PERSONS RELOCATION SCHEME

HOME OFFICE 'STATEMENT OF REQUIREMENTS'

1. Section 1 – Delivery Requirements

1.1 The Syrian VPR scheme is made up of two elements.

1.1.1 **Pre arrival** – Provision of medical and travel services enabling the migration of accepted Beneficiaries to the UK;

1.1.2 **Post arrival** – Housing provision, initial reception arrangements, casework and orientation support including English language provision.

1.2 The Authority requires the following deliverables:

2. Post Arrival services

Provision of accommodation:

2.1 The Recipient will meet and greet arriving Beneficiaries from the relevant airport and escort them to their properties briefing them on how to use the amenities

2.2 The Recipient will arrange accommodation for the arriving Beneficiaries which meets local authority standards and which will be available on their arrival and is affordable and sustainable

2.3 The Recipient will ensure that the accommodation is furnished appropriately. The furniture package should not include luxury items. This means that food storage, cooking and washing facilities can be provided but the facilities should not include the provision of other white goods or brown goods, i.e. TV's, DVD players or any other electrical entertainment appliances.

2.3.1 The Recipient will ensure that the Beneficiaries are registered with utility companies and ensure that arrangements for payments are put in place (no pre pay/card accounts)

2.3.2 The Recipient will provide briefings on the accommodation and health and safety issues for all new arrivals including the provision of an emergency contact point

Casework support service:

2.4 The Recipient will ensure that Beneficiaries are provided with a welcome pack of groceries on their arrival

2.5 The Recipient will provide a cash/ clothing allowances for each Beneficiary of £200 – this is to ensure they have sufficient funds to live on while their claim for benefits is being processed.

2.6 The Recipient will provide advice and assistance with registering for mainstream benefits and services and signposting to other advice and information giving agencies – this support includes:

2.6.1 Assisting with registration for and collection of Biometric Residence Permits following arrival

2.6.2 Registering with local schools, English language and literacy classes

2.6.3 Attending local Job Centre Plus appointments for benefit assessments

2.6.4 Registering with a local GP

2.6.5 Advice around and referral to appropriate mental health services and to specialist services for victims of torture as appropriate

2.6.6 Providing assistance with access to employment

2.7 The Recipient shall put in place a support plan for each family or individual for the 12 month period of their support to facilitate their orientation into their new home/area.

2.8 The Recipient shall put in place arrangements for the provision of English language classes which Beneficiaries should be able to access within one month of arrival. This should be provided following an assessment to determine the appropriate level of provision. This provision should be delivered by an accredited English for Speakers of Other Languages (ESOL) provider. This ESOL provision should be made available until such time as suitable mainstream provision becomes available or until 12 months after arrival (whichever is sooner). The purpose of the language tuition is to ensure that Beneficiaries are able to carry out basic transactions within the communities in which they have been placed.

2.9 Throughout the period of resettlement support the Recipient will ensure interpreting services are available.

2.10 The above services will be provided through a combination of office based appointments, drop in sessions, outreach surgeries and home visits.

Requirements for Beneficiaries with special needs/assessed community care needs:

2.11 Where Beneficiaries are identified as potentially having special needs/community care needs the Authority will ensure, as far as possible that these needs are clearly identified and communicated to the Recipient 6 weeks prior to the arrival of the Beneficiaries.

2.12 Where special needs/community care needs are identified only after arrival in the UK, the Recipient will use its best endeavours to ensure that care is provided by the appropriate mainstream services as quickly as possible

3. General Requirements

Hours of operation:

3.1 The Recipient shall note that the Authority's offices perform normal business during the hours times of 09.00 to 17.00 on Working Days

3.2 The Programme as defined in the Statement of Requirements (SoR) shall be provided on each Working Day. The Authority recognises that in the interests of efficiency the exact availability and timings of the various service elements will vary. It is envisaged that some Out of Hours provision will be required from the Recipient

3.3 All premises used to deliver the Programme elements should meet all regulatory requirements and be suitable for the purpose.

3.4 The Recipient and/or its Delivery Partners shall develop, maintain and implement the following procedures:

3.4.1 A procedure for Beneficiaries to complain about the service provided by the Recipient.

3.4.2 A procedure for managing and reporting critical incidents. The Authority must be advised of such incidents as soon as reasonably possible, but in any event by the end of the next Working Day

Personnel standards:

3.5 The Recipient shall ensure that the recruitment, selection and training of its Staff, including persons employed by or as agents or sub-contractors to the Recipient, are consistent with the standards of service required for the performance of the service. The Recipient will fully equip and train staff to ensure they are able to fulfil their roles and ensure that appropriate and sufficient security provisions are made for all staff undertaking face-to-face activities. Also, the Recipient shall ensure that staffing levels are appropriate at all times for the purposes of the service and ensure the security and well-being of all Beneficiaries, dependent children and its staff.

3.6 The Recipient shall ensure that all applicants for employment in connection with the Requirement are obligated to declare on their application forms any previous criminal convictions subject always to the provisions of the Rehabilitation of Offenders Act 1974.

3.7 In addition, the Recipient shall ensure that all Staff (including volunteers and sub-contractors):

3.7.1 employed or engaged have the right to work in the United Kingdom under applicable immigration Law

3.7.2 Disclosure and Barring Service checks are undertaken on any potential Staff member. The results of such checks must be known before any employee undertakes duties requiring contact. Where such checks reveal prior criminal convictions that might reasonably be regarded as relevant to the appropriateness of the individual to have unsupervised access, particularly to children under the age of 18, or where such checks are not possible because of identification issues, the Recipient shall follow its internal policy and carry out an appropriate risk assessment before an offer of employment is made.

3.7.3 who are likely to have unsupervised access to children under the age of 18 have been instructed in accordance with National Child Protection Guidelines and Area Child Protection Committee guidance and procedures.

3.7.4 Providing immigration advice should be known to the Office of the Immigration Services Commissioner (OISC) in accordance with the regulatory scheme specified under Part 5 of the Immigration & Asylum Act 1999. The Recipient shall use all reasonable endeavours to ensure that Staff do not provide immigration advice or immigration services unless they are “qualified” or “exempt” as determined and certified by OISC.

3.8 The Recipient shall, on request, provide the Authority with details of all staff (and volunteers and sub-contractor agents) delivering the service in this schedule.

3.9 The Recipient shall, on request, provide the Authority with CVs and/or job descriptions for all members of staff selected to work on the project.

3.10 The Recipient shall use all reasonable endeavours to comply with the requirements of the Computer Misuse Act 1990.

3.11 The Recipient shall implement the Programme in compliance with the provisions of the Data Protection Act 1998.

Information sharing:

3.12 The Authority expects the Recipient to share relevant information on the delivery of the Programme and on Beneficiaries by signing a Sharing of Information Protocol with relevant deliverers of the Programme.

3.13 Beneficiaries will be expected to sign a consent form to confirm their willingness to share personal data with executive bodies and relevant deliverers of the programme. The Recipient will retain these forms and will allow inspection by the Authority as requested.