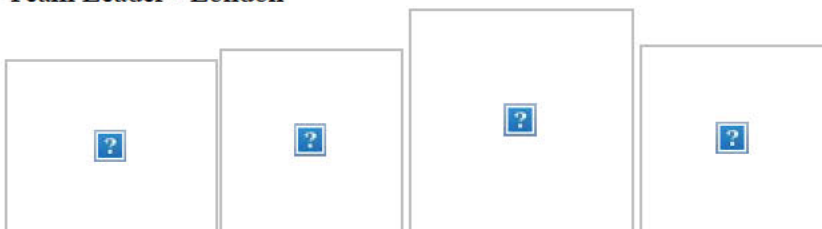


From: [Julia Pena Guardia](#)
To: [Local Plan](#)
Subject: RE: Issues with submitting submission to Local Plan Consultation
Date: 23 September 2024 13:35:17
Attachments: [image001.png](#)
[image008.png](#)
[image010.jpg](#)
[image012.jpg](#)
[image014.jpg](#)
[image016.jpg](#)
[image017.jpg](#)
[image018.jpg](#)
[image019.png](#)
[image020.jpg](#)
[image021.jpg](#)
[image022.png](#)
[image023.jpg](#)
[image024.jpg](#)
[Local Plan Submission.msg](#)

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hi [REDACTED],
Thank you. Please find attached.
Best wishes,
Júlia Peña Guardia (She/Her)
Team Leader - London



[REDACTED]
@ShelterLDN
26-28 Ramsgate Street | London | E8 2NA
[Website](#) | [Facebook](#) | [Twitter](#)
[Instagram](#) | [LinkedIn](#) | [Youtube](#)

From: Local Plan <LocalPlan@newham.gov.uk>
Sent: Monday, September 23, 2024 10:36 AM
To: Julia Pena Guardia <[REDACTED]>
Subject: RE: Issues with submitting submission to Local Plan Consultation

Dear Julia,
Thank you for sending through your representation. However, as part of our standard procedure, we still require the bounce back message or any evidence showing your attempts to submit before the consultation deadline. This will help us verify the issue you experienced. Could you please forward the bounce back/ error message or any relevant information as soon as possible?

Best regards,

[REDACTED]
Senior Planner | Planning Policy
London Borough of Newham
Newham Dockside | 1000 Dockside Road, London E16 2QU
Phone Number [REDACTED]
[newham.gov.uk](#)



Read more about our Building a Fairer Newham plan [here](#) and watch [here](#).

From: Julia Pena Guardia <[REDACTED]>

Sent: 20 September 2024 17:11

To: Local Plan <LocalPlan@newham.gov.uk>

Subject: RE: Issues with submitting submission to Local Plan Consultation

Hi [REDACTED],

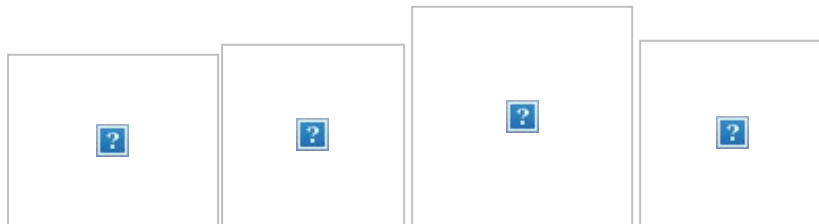
You are right, I think it was about the file size. I have now been able to send it and I think it has been received.

Thanks!

Best wishes,

Júlia Peña Guardia (She/Her)

Team Leader - London



[REDACTED]
@ShelterLDN

26-28 Ramsgate Street | London | E8 2NA

[Website](#) | [Facebook](#) | [Twitter](#)

[Instagram](#) | [LinkedIn](#) | [Youtube](#)

From: [REDACTED] <[REDACTED]> **On Behalf Of** Local Plan

Sent: Friday, September 20, 2024 5:10 PM

To: Julia Pena Guardia [REDACTED]

Subject: RE: Issues with submitting submission to Local Plan Consultation

Dear Julia,

Thanks for your email. Please can you forward us the bounce back message so we can understand the issue. It may be that your file size is too large and you might need to save it as a compressed pdf or use wetransfer to send us the file.

Thanks,

[REDACTED]

From: Julia Pena Guardia [REDACTED]

Sent: 20 September 2024 17:03

To: Local Plan <LocalPlan@newham.gov.uk>

Subject: Issues with submitting submission to Local Plan Consultation

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Hi team,

I hope you are well.

I am getting in touch on behalf of Shelter London and the Newham Temporary Accommodation Action Group to make a joint submission to the Newham Local Plan Consultation. I have tried to send our response and adjacent documents twice before the deadline but it keeps bouncing back. I will try once again but if it does not work, I would ask that you please grant us an extension until Monday or an alternative email address so we can sort out this issue.

Thank you very much in advance.

Best wishes,

Júlia Peña Guardia (She/Her)

Team Leader - London




@ShelterLDN

26-28 Ramsgate Street | London | E8 2NA

[Website](#) | [Facebook](#) | [Twitter](#)

[Instagram](#) | [LinkedIn](#) | [Youtube](#)

We exist to defend the right to a safe home and fight the devastating impact the housing emergency has on people and society.

Home is everything. Protect it with [a gift in your will](#).

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Registered address:

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Sara Chiong

From: Julia Pena Guardia [REDACTED]
Sent: 20 September 2024 17:07
To: Local Plan
Subject: FW: Local Plan Submission
Attachments: Equalities_data_form__Clean.docx; International students in a post-pandemic cost of living crisis_24.05.24.pdf; Newham TAAG - Local Plan Response Form.pdf

Follow Up Flag: Follow up
Flag Status: Completed

You don't often get email from [REDACTED]. [Learn why this is important](#)
Hi,

I hope you are well.

I am getting in touch on behalf of Shelter London and the Newham Temporary Accommodation Action Group to make a joint submission to the Newham Local Plan Consultation. Please find attached:

- The response form.
- The Equalities Data form.
- Shelter's Brick by Brick report, which contains a plan to deliver the social homes we need to end the housing emergency: [Report on social housing - Shelter England](#)
- The final report on International Students in a Post-Pandemic Cost of Living Crisis, which is referenced in our submission.
- Two pieces of guidance from Morris + Co on how to build suitable emergency accommodation for young people and families, which is also referenced in our submission.
 - Young People: https://morrisand.company/assets/3_We-Recommend_PUBLISH.pdf
 - Families: https://morrisand.company/assets/Research-Report_FINAL_231101-lowres.pdf

Best wishes,

Júlia Peña Guardia (She/Her)
Team Leader - London




[REDACTED]
@ShelterLDN
26-28 Ramsgate Street | London | E8 2NA
[Website](#) | [Facebook](#) | [Twitter](#)
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We exist to defend the right to a safe home and fight the devastating impact the housing emergency has on people and society.

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Registered address:
88 Old Street
London
EC1V 9HU Company number 1038133
Registered in England and Wales (263710) and in Scotland (SC002327).

Response Form for Regulation 19 Consultation.

	<p>Local Plan Publication Stage Response Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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**Name of the Local Plan to which this representation
relates:**

Newham Draft Submission
Local Plan

Privacy Notice

Who we are

London Borough of Newham (LBN) is registered with the Information Commissioner's Office (ICO) as a 'Data Controller' This privacy notice applies to you ('the service user') and LBN ('the Council'). The Council takes the privacy of your information very seriously.

This privacy notice relates to our functions relating to the Newham Local Plan Review Consultation (Regulation 19). It also provides additional information that specifically relates to this particular consultation, and should be read together with our [general privacy notice](#), which provides further detail.

What data do we collect and process

We collect your name, contact details, email address, job title and organisation if applicable and demographic equalities data if you choose to share it.

Why we collect your data

The consultation is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. We collect your data so that we can get your views on the legal compliance or soundness of the Local Plan, as well as its compliance with the duty to co-operate.

The lawful basis for processing your data

The lawful basis we use to process your data as set out in UK data protection legislation is:

Article 6 (a) Consent: the individual has given clear consent for us to process their personal data for a specific purpose.

Article 9 (a) Explicit Consent: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

You can withdraw your consent at any time.

How we use your data

This data is collected, collated and then submitted to the Secretary of State, who will appoint an Inspector to conduct an independent examination of the Local Plan. Demographic data will be processed anonymously to assess the effectiveness of our consultation.

Where you have consented, your contact details will be added to our consultation database for future consultations and updates on the Examination in Public.

At submission representations will be made public on the council's website, including name of person and organisation if applicable making representation. Other personal information will remain confidential.

Representations, in full, submitted along with the Local Plan, evidence base and documents Submission Draft Newham required by legislation to the Planning Inspectorate and to the person the Secretary of State appoints as the Planning Inspector. Contact details will be made available to the Inspector and Programme Officer so they can contact individuals to participate in the Examination.

Consultation database is stored on Mailchimp and accessed by planning policy team only. Mailchimp stores names and email addresses of those on the consultation database in line with Mailchimp policies, particularly its [data processing addendum](#). Please be aware they may store personal data external to the UK specifically in the USA and/or EU.

Who we will share your data with

We will only share your data with the Planning Inspector appointed by the Secretary of State, the Programme Officer appointed by Newham, and within the planning policy team. Your name and organisation (if applicable) will be published on our website along with representations upon submission. Demographic data is not shared with the Planning Inspector or the Programme Officer.

We will not share your personal information with any other third parties unless you have specifically asked us to, or if we have a legal obligation to do so.

How long we will keep your data

We will keep your data safe and secure for a period of 15 year(s) in line with our retention Schedule. After this time, it will be securely destroyed.

How do we protect your data

We comply with all laws concerning the protection of personal information and have security measures in place to reduce the risk of theft, loss, destruction, misuse or inappropriate disclosure of information. Staff access to information is provided on a need-to-know basis and we have access controls in place to help with this.

See the [Planning Inspectorate Customer Privacy Notice](#) for details on how they keep your data safe and secure.

Know your rights

We process your data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Find out about your rights at [Your rights – Processing personal data privacy notice – Newham Council](#) or at <https://ico.org.uk/your-data-matters/> If you have any queries or concerns relating to data protection matters, please email: dpo@newham.gov.uk

Response Form

For guidance on how to complete this representation form please view the Regulation 19 Consultation Guidance <https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh>.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Ms"/>	<input type="text"/>
First Name	<input type="text" value="Julia"/>	<input type="text"/>
Last Name	<input type="text" value="Pena Guardia"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Team Leader"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Shelter – this is a joint submission with Newham Temporary Accommodation Action Group"/>	<input type="text"/>
Address Line 1	<input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text" value=""/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text" value=""/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value=""/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	<input type="text" value="Homes"/>
Implementation Text	<input type="text" value="H1: Meeting housing needs"/>
Paragraph	<input type="text" value="H1.3"/>
Policies Map	<input type="text"/>

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Homes policy opens with a few paragraphs on Housing Need in Newham. The policy acknowledges acute need in Newham for more social rent, that Newham has the highest rates on homeless households in temporary accommodation and of households living in overcrowded conditions. Please note that although the govt is currently reviewing the NPPF, this plan should anticipate changes to how local housing need is calculated as councils will be expected to consider need for affordable housing and social rent. So the target of 50% social rent on every development is welcomed and

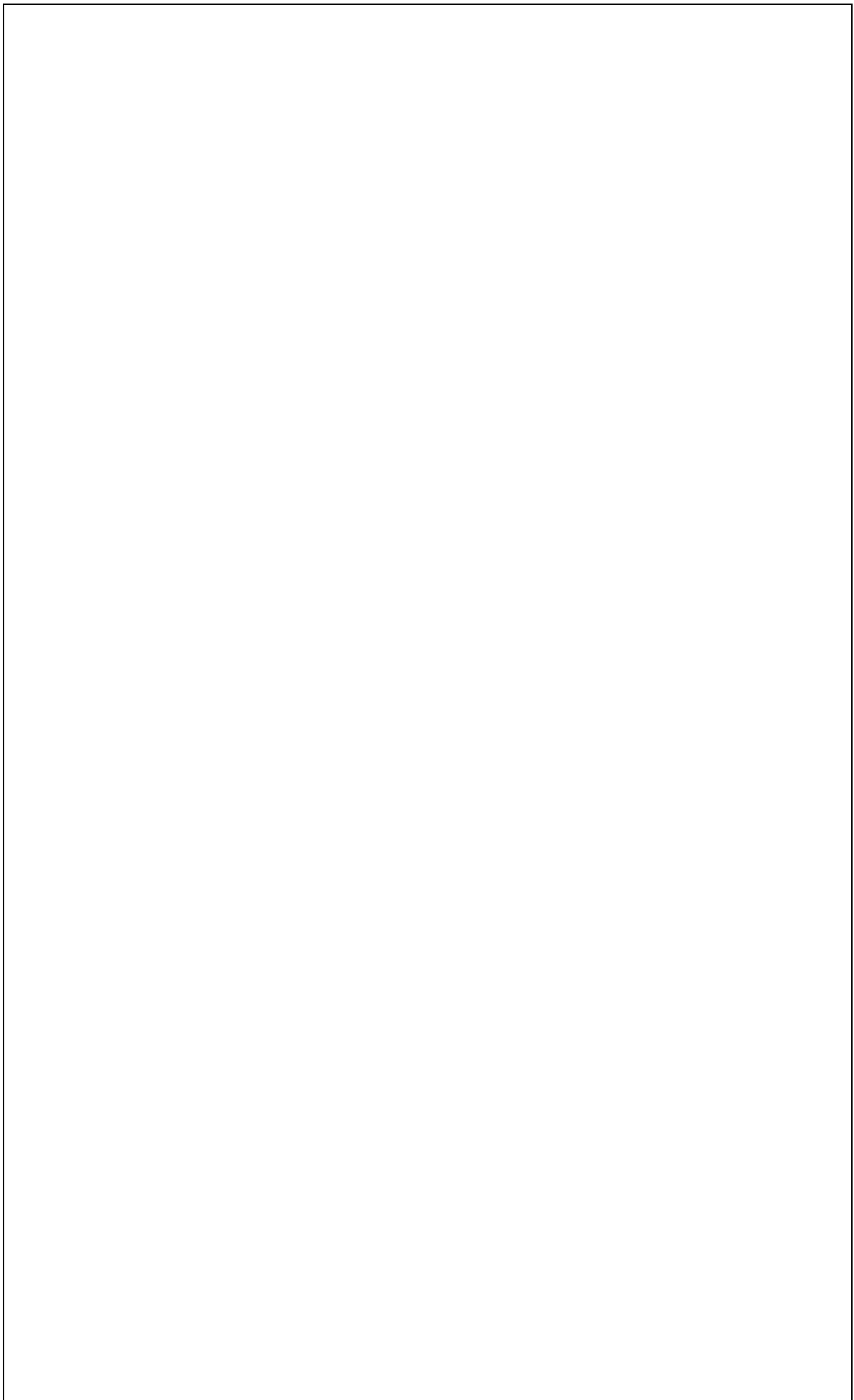
However, H1. Meeting Housing Need does not include any further information on what types of households are most affected by the lack of quality homes in the borough. There is mention throughout the policy of single homeless people, care leavers, people needing sheltered accommodation, etc. but it would be relevant to outline where the housing need presents itself in the borough in this section.

Even though social rent percentages are mentioned later on in the policy, this section should already include a clear target for social rent homes that take into account setting provisions for social rent homes based on social housing waitlists and reducing homelessness in Newham. It needs to be clearer in the plan because this should be the guiding star when approving development.

Additionally, there is no acknowledgement of existing dire property conditions, particularly for households living in temporary accommodation in and out of borough provided by the local authority and usually managed by private landlords and property management agencies. It also does not include any figures on the increasingly high amount of money being spent in temporary accommodation every year. According to Shelter's Still Living in Limbo report (2023) where research was conducted on 1,112 people living in temporary accommodation:

- Three-quarters (75%) of households live in poor conditions, including one in five (21%) with a safety hazard, such as faulty wiring or fire risks.
- More than two thirds (68%) of people have inadequate access to basic facilities - such as cooking or laundry facilities.

[Still Living in Limbo: Why the use of temporary accommodation must end - Shelter England](#)



6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

While the legal minimums may be met, it is clear that this will not end the housing emergency without the following:

We believe it would be important to be clearer and more specific about who is most affected by the lack of quality homes in Newham. This would include:

- Families – they are most impacted by overcrowded conditions in their homes and really struggle to find family-sized homes that are affordable (below or at Local Housing Allowance rates).
- People with additional needs – a task force composed of the Newham Planning and Policy Team and the Occupational Therapy service have identified a lack of adaptable and adapted homes that meet the needs of people with additional needs and learning disabilities. Local organisations and people with lived experience have been consulted on this, so it is essential that this is reflected in this section of the policy.
- Asylum seekers and refugees gaining recourse to public funds, who often need homelessness assistance.
- Migrants and people with no recourse to public funds, with a particular emphasis on international students and their families, who are particularly vulnerable to destitution.
- Single homeless people.
- Care leavers.

Additionally, we believe there needs to be a clear acknowledgement in this section of the dire property conditions that many households in Newham are exposed to, particularly in regard to disrepair, damp and mould. While the council now has a new Damp and Mould Strategy and Action Plan, a Damp and Mould Taskforce and a robust PRS and licensing team, it is important to explicitly mention ongoing challenges around these issues to make sure that future buildings, especially those that might end up being used as temporary accommodation in Newham, are fit for habitation and high quality.

Finally, we would like to ask that this section includes a mention of the temporary accommodation bill of £20+ million per year, which is exacerbated by the sharp increase in nightly rate accommodation at hotels. This information is important because it should shape the housing need in the borough. If the borough focuses on the provision of safe, decent and genuinely affordable social rent homes to provide families with, this bill can be reduced in the long term.

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4 (3) Complies with the
Duty to co-operate

Yes

No

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

H2.4. refers to turning family dwellinghouses into HMOs to meet housing need. Policy seems quite generous with enabling conversion of family dwellinghouses into smaller properties or HMOs. It also does say that the HMOs need to be high-quality. However, this policy does not seem to be well-safeguarded, and it is unclear how this has been weighed in against the increasing need for family-sized properties in the borough. Advocacy and support agencies in the borough have been campaigning to stop families from being placed in HMOs via section 17 of the Children Act 1989 by children's services. We don't want this work to be undermined by having an increase in creation of HMOs in the borough. Language should be clearer to limit this option and to make it clear that the quality needs to be higher than existing.

Additionally, there is no mention of accessibility. With a high number of residents in Newham living with a disability or additional needs, it is essential that the policy is explicit in guaranteeing that a percentage of all property conversions is kept or made accessible and adapted or adaptable. This can be done in consultation with adult social care and the occupational therapy service.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We ask that language is made clearer to limit this option (conversion) and to make it clear that the quality needs to be higher than existing. Additionally, we wish to see a real commitment to consulting Temporary Accommodation service and the Council's Children's Commissioners as part of the application process. We agree with this, but these two teams are notoriously busy and already overwhelmed by the increasing number of homeless people in the borough. In order to do this, there needs to be a safeguarded time for these teams to be contacted or even for additional staff to be hired to build capacity. This may not need to be an explicit element of the policy document, but it needs to be taken into account and considered.

In terms of accessibility, we would like to see specificity in what property conversions need to be kept or made accessible, with particular focus on ground floor properties and buildings where there is a lift. This is relevant for both single homeless people and families. We would also want to add to the policy that Adult Social Care and Occupational Therapy Service will be consulted as part of the application process for this kind of properties. Same considerations about time and capacity as above would apply here.

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	<input type="text" value="Homes"/>
Implementation Text	<input type="text" value="H8: Purpose-built student accommodation"/>
Paragraph	<input type="text" value="ALL"/>
Policies Map	<input type="text"/>

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This section does not seem to include anything about building affordable student accommodation for families. This is a particularly acute issue for international students who have come to the UK with their dependents. In the joint report INTERNATIONAL STUDENTS IN A POST PANDEMIC COST OF LIVING CRISIS: KNOWLEDGE EXCHANGE AND POLICY IMPLICATIONS by Kavita Datta (Queen Mary University of London), Rozina Iqbal (Newham Community Project) and Helena Taylor (Newham Council) cites housing as one of the key issues affecting international students in Newham. Many live in overcrowded conditions, in HMOs paying unaffordable rents and at risk of eviction if they miss a rent payment. A copy of this report has been attached to our joint submission.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We ask that the policy explicitly mentions students with families and specifically international students with dependents in this section and to consider allocating a percentage of family dwellings needed when considering planning applications for purpose-built student accommodation.

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	<input type="text" value="Homes"/>
Implementation Text	<input type="text" value="H11: Housing design quality"/>
Paragraph	<input type="text" value="H11.3"/>
Policies Map	<input type="text"/>

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

There is no mention throughout this policy document of emergency accommodation. While this can be included in wider temporary accommodation, it is essential to differentiate the two in this section and make it clear that a percentage of newly built temporary accommodation needs to be specifically for emergency accommodation. Due to shortages of purpose-built emergency accommodation, especially in borough, families are being placed in hotels and B&Bs for months while they wait for a decision on their homelessness duty. This is often longer than the legally permissible 6 weeks for households with dependent children and they tend to be in accommodation with no kitchens nor washing facilities. The other option is to be accommodated on very short notice away from borough, schools, work and support networks. Morris + Co have written new guidance on family emergency accommodation, which contains spatial guidance, delivery models and a feasibility study. This has been attached to this submission for your consideration.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Emergency accommodation will always be necessary to house households facing immediate homelessness. It is imperative that this policy mentions this kind of accommodation explicitly and links its use to the housing need in the borough. We ask that you review the guidance attached and consider including some of its recommendations to the Local Plan.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Members of the Newham Temporary Accommodation Group would welcome the opportunity to attend these hearing sessions because we want to make sure that social housing is fully embedded into this policy document and that it truly reflects the housing need in the London Borough of Newham. This would be an opportunity to clarify any of our recommendations.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 6th September 2024

INTERNATIONAL STUDENTS IN A POST PANDEMIC COST OF LIVING CRISIS

KNOWLEDGE EXCHANGE AND POLICY IMPLICATIONS

Joint report by

**Kavita Datta (Queen Mary University of London),
Rozina Iqbal (Newham Community Project) and
Helena Taylor (Newham Council)**

May 2024



INTRODUCTION

International students are the subject of intense public scrutiny. With 679,970 international students studying in the UK in 2021-22, comprising 24% of the total student population and rising to 45% of the postgraduate body, proponents point to the economic and geopolitical benefits of this sector. International students contributed £41.9 billion to the UK economy in 2021-22 with every additional 1% growth in market share potentially boosting its economy by £5 billion per year (UUK, 2023; Russell Group, 2023). The geopolitical influence of students returning to their countries of origin is noted for bolstering the UK's global position in uncertain times. In turn, British universities are increasingly dependent upon international fees for their financial viability/survival.¹

Notwithstanding this, international students have emerged as a target for the current UK government which is seeking to deliver its pledge to reduce net migration to the UK. Well reported speculation by senior politicians about the future of the UK's post-study visa – a key driver of international recruitment - as well as the subsequent implementation of restrictions on family/dependent migration accompanying postgraduate students pursuing taught programmes, have already had a deleterious impact on overseas recruitment. This is a worrying development given that these students accounted for 48% of all international enrolments in the UK in 2021-22 as compared to 34% in 2017-18 (UUK, 2023). Escalating visa costs and NHS surcharge are further rendering the UK an unattractive destination in a fiercely competitive global market (The Royal Society, 2022).

Even as these debates rage, international students studying in UK universities have experienced significant hardships, weathering both the Covid-19 pandemic and subsequent cost of living crisis in recent times. These everyday lived experiences are absent in public debates although gaining some traction in recent times (The Guardian, 2023). The ambitions of the International Education Strategy (2019) jointly penned by the then Department for International Trade and the Department for Education have fallen woefully short of extending and enabling a 'welcoming environment' to international students and providing them with a 'high quality experience'. Caught up in an anti-migrant environment increasingly targeting international students, the economic, social, and emotional fall out of these twin crises are being met by third sector organisations and local councils which are themselves stretched as the cost-of-living crisis beds in.

It is in this rapidly changing context that a collaborative project between Queen Mary University of London, Newham Community Project and Newham Council has sought to (i) evidence the lived experiences and multiple intersecting vulnerabilities that international students face; (ii) building on this evidence, and in collaboration with

¹ International students are charged 'unregulated' fees in contrast to English home students whose fees have been pegged for over a decade. The latter translates into universities facing a significant and growing funding gap which is attributable to the difference between the average cost of educating an undergraduate student in England and the amount that universities receive in tuition fee income and government grants. A Russell Group report (2023) estimates that by 2030, there will amount to a £5000 funding gap per UK student per year.

relevant stakeholders, co-develop a community of practice to better support international students; (iii) leverage opportunities to lobby for international students.

The evidence reported in this briefing paper derives from (i) primary research undertaken with international students for which a mixed methods approach was adopted combining an online survey (81 responses, 61% female respondents, 39% male), in-depth interviews (15 participants) and a focus group discussion (6 participants); (ii) two knowledge exchange and policy workshops involving respectively 21 and 29 stakeholders including representatives from voluntary organisations, councils, food bank managers, international students, academics and colleagues working in International Recruitment Offices.² The remainder of this briefing paper is organised into two main sections: we present key findings from our research with international students, and building on these, we identify proposed interventions for further discussion arising from a workshop with diverse stakeholders.

INTERNATIONAL STUDENTS IN CRISIS?

Apart from your education, you know, I think you have to, uh, see the other side of...see the financial side. You need to work. And, uh, everything is so much, you know, fast paced in a very fast paced environment. You need to I can say that you need to be a robot because every time the university is pressurising you and, uh, after university, there are rent and bills and everything you need to manage. You need to manage everything simultaneously and very quickly. So it's very depressive [sic] from my point of view...It's really hard. (International student, interview 6).

In this section of the report, we draw upon the online survey, in-depth interviews, and focus group discussion held with international students. In terms of their *demographic profile*, 34% of students were over 30 years of age, 48% between 26-30 years; the vast majority (80%) were pursuing a postgraduate qualification and were from Asia³ (65% South Asia, 11% East Asia). In turn, over half of the surveyed population had lived in the UK for less than three years with a quarter having been here for between three to five years. Three quarters of the women and men resided in private rental accommodation with a further 22% living in council/social housing. One person reported themselves as homeless. Interestingly, while most participants lived in the London Borough of Newham, they attended a range of universities not all of which had a London campus.

² The authors acknowledge the support of the Queen Mary University of London Policy Secondment award for supporting this project.

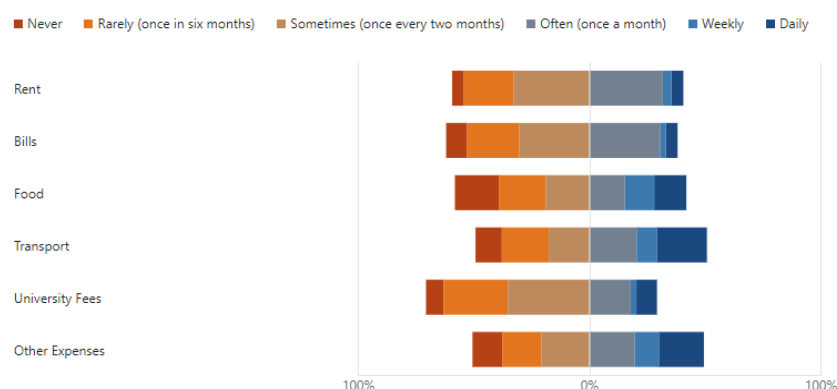
³ China and India are the top sending countries to the UK. In 2021-22, Chinese students made up 27.8% of non-EU international student population while Indian students accounted for 22.1%. The latter population has grown by 345% between 2018-19 and 2021-22 (UUK, 2023). Indian students are also likely to want to migrate with dependents.

The key *reasons given for coming to the UK* were “an excellent education system...a multicultural country,” (interviewee (int.) 1) while for others London was “the only option...because there are a lot of opportunities. A big city. You can have good exposure, international exposure there, and the job market is very good,” (int. 6). London, interviewee 8 told us “is very welcoming to international students.” In turn, the “option to bring dependents along was an important factor influencing my decision [to come to London]” (int. 1) articulated particularly by female students. This is significant in that recently implemented immigration restrictions on bringing family members may result in fewer female students taking advantage of international education opportunities.

Notwithstanding these positive impressions, the reality post-migration was somewhat different. In the words of interviewee 4, “I expect like how we are seeing in the movies, like, uh, they’re like a super life. So, we think so. We can be like that. But when we come here it’s totally different.” *The students identified multiple and intersecting vulnerabilities.* Despite perceptions that international students come from well to do families, it is the case that many are critically dependent on being able to work to survive in the UK. Discussions in our Knowledge Exchange Workshop revealed instances of misrepresentation of financial status by students to meet visa requirements and strategies such as ‘crowdfunding’ for fees which involved reaching out to distant relatives for help. Once in the UK, access to jobs – particularly during the pandemic but also in its aftermath - was a key issue for most students we spoke with. Interviewee 2 noted that “the job market and restrictions during the pandemic have added financial stress...The minimum wage not increasing, limited job opportunities for students, and biases in hiring practices contribute to financial challenges. Companies avoid hiring international students due to restrictions, making it harder to sustain oneself.” The survey corroborates this with under half of the sample not working (43%) with 19% working full time, and 29% part time.

The lack of an income or steady income had significant multidimensional repercussions which were captured in the survey (see Figure 1).

Figure 1: The frequency of experiencing difficulties in paying for living expenses:



Accommodation was “scarce, expensive and difficult to find especially if you have children” interviewee 3 said. Pressure to continue to pay rent during the pandemic was evident with interviewee 8 telling us that “we were living in shared

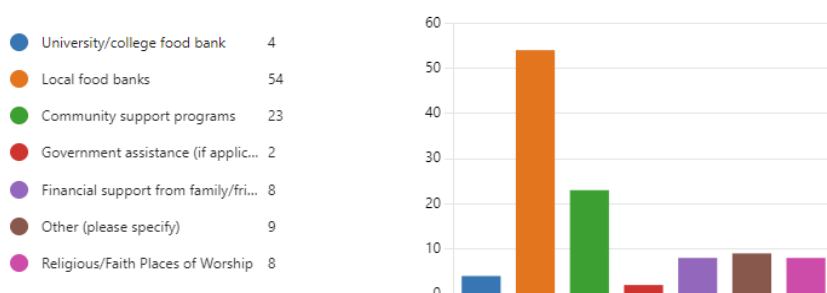
accommodation. And so the landlord, he was just very clear. [He said] ‘Whatever happens, whatever circumstances you are going through, I can’t stop taking rent’.” Living in overcrowded housing was a common experience. Of the 81 people who completed the survey, only 14 lived by themselves. The remainder were sharing accommodation with family members (spouse/partner, children under the age of 18) as well as other adults and friends. The maximum number reported was 17. The fact that children under the age of 18 co-resided in these overcrowded dwellings raises safeguarding issues.

Food insecurity was a key issue with 46% of the survey respondents experiencing increased reliance on food aid since they arrived in London/the UK while this decreased for 19% and stayed the same for 35% of respondents. The overwhelming majority of the students we spoke to were reliant upon local food banks and community support programmes to meet their food needs (see Figure 2). When asked how food aid could be improved, responses ranged from having access to jobs which would reduce reliance on food aid, to food provisions having a longer shelf life and for culturally appropriate foods.

Figure 2: Food aid sources

22. Where have you accessed food aid? Select as many as apply:

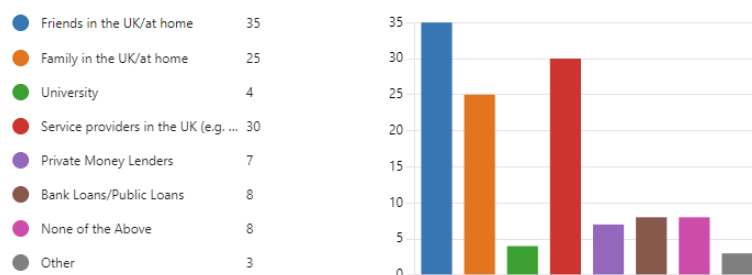
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Perhaps unsurprisingly, *paying bills* was a constant struggle particularly post-Covid when our research participants noted high rates of inflation with “everything [prices] have been got double” (int. 6). The impacts of these financial pressures on mental and emotional health were significant. Interviewee 3 spoke about the “significant *mental stress* due to accommodation, financial constraints, and the struggle to provide for our children’s basic needs. The lack of proper support and understanding from landlords and the community adds to the stress,” while another respondent, interviewee 7, said that being unable to work, constant demands for rent led to him feeling like “So yeah, everything just, you know how you suffocate. It was like that. You [sic] just came from every side.”

Sources of support varied (see Figure 3) with friends and family located in and outside of the UK featuring quite significantly. Outside of these familial and friendship networks, participants particularly elaborated on universities and the voluntary sector in their responses. Taking these in turn, perceptions of support from universities varied.

Figure 3: Sources of support in times of crisis



A common complaint was the lack of communication by universities particularly during the Covid-19 pandemic when interviewee 6 told us “no dean, no professor was responding.” Many felt frustrated by this with interviewee 7 commenting that he felt that universities “don’t care who you are.” Indeed, they argued that the main communication from universities related to demands for the payment of fees which generated further pressure on students. These were articulated by interviewee 6 who said:

Universities not good at connecting with students – only got in touch asking for fees - Okay. You can you can tell us when you're going to pay. Know they gave us time that this is the last time where you have to pay so and so amount. And it was it was so bad that my family in India was ready to pay the university fees because they were afraid. They were afraid that, okay, if we don't pay the university fees, what's going to happen? I was in the UK sponsored by the university. The university had access to me with all this visa and everything because I did applied from the CAS delivery issued from the university. But what happens if I don't pay the university's fees now? Will they abolish my visa? Will they like fail me and then ultimately my visa goes away? What doesn't happen? So my family was ready to like take a loan and then pay my fees, but do pay my fees on time because everything was great. We didn't know what was going to happen.

Importantly, other students reflected that while universities did have services – such as hardship funds – which international students were eligible for, awareness of these services was not widespread.

In contrast the voluntary sector was judged very highly. Speaking about it at length, interviewee 7 told us that it was the voluntary sector which provided aid ranging from access to food, advice and information. Interviewee 8 spoke about the wider emotional support commenting that “But, you know, you get that warm hug, and someone gives you food. That's something else. I think that is what we got from the voluntary sector. We had someone to talk to. We had someone to share our values with. Like if you don't have anyone in. Look, you could go to your brother, you could go to your sister. But as international students, we didn't have brothers or sisters.

Who knows what our problems are or what we are suffering from. So voluntary sector was this experienced person who know about the UK.”

RECOMMENDATIONS

Having detailed key findings from our research, in this section we identify key points for intervention and leverage which have been co-developed in consultation with key stakeholders who participated in two Knowledge Exchange workshops.

The starting point for discussions was the need to acknowledge the complexity and interconnectedness of issues affecting international students, ranging from educational experiences, immigration issues and financial precarity, which then requires multifaceted solutions. Stakeholders agreed on the need for continuous dialogue and collaboration to address international student needs, adapting to evolving circumstances as well as accountability and responsibility from institutions and policymakers, ensuring commitments translate into action.

A whole of government approach, is required to embed inclusive and equitable practices in education and immigration policies which prioritise diversity. Particular priorities for the Government are to:

- Remove international students from migration targets: there is strong evidence that the international student sector is a net contributor to the UK economy. In a post-Brexit world, international alumnae can play a very significant role in British geopolitical status.
- Create a body to monitor international student *experience* which currently falls between the remits of the Office for Students which focuses on home students and UUKi which prioritises recruitment of international students.
- Urgently review the universities funding model so as to reduce dependency on the unregulated fees sector which is increasingly volatile.
- Need for a university grading system such as OFSTED which includes safeguarding criteria for schools.

A range of priorities were identified **for universities**:

- Establish a code of conduct for international students underpinned by principles of fair treatment, commitment to a positive international student experience which is cognisant of issues related to equality, diversity and inclusion and the role of universities in facilitating student success. Such codes of conduct should redress real or perceived disparities in the treatment of home and international students, and align with broader educational goals and the rights of international students.
- Improved due diligence of agents, and awareness of sub-agent systems. Our research has highlighted particular issues in India and Pakistan, and concerns

about lack of transparency on application processes, disinformation about courses, universities and cost of living in the UK. Clarification of financial requirements for visa applications is also needed.

- Better communication at application stage, prior to departure and on arrival. This is very important in a context where students are overly-reliant upon agents, their peers and other students in the UK for information.
- Offering targeted pastoral and student support services (such as bursaries), and raised awareness of existing services available to international students (such as hardship funds).
- Particular need for mental health services which are cognizant of cultural barriers which prevent uptake. Pilot programmes, funding collaborations, and efforts to improve cultural competency in mental health services maybe required.
- Address the lack of pastoral support which was particularly noted in satellite campuses in London where the focus is on the delivery of education.
- Greater flexibility in the payment of fees, including payment plans extending until the end of programmes. Any failure to meet payment obligations would result in the students being ineligible for graduation, thereby ensuring that fees are settled in full by the end of the programme.
- Opportunities to learn across the sector through the sharing of best practice and resources to support international students and promote collective learning.
- Recognise challenges in language proficiency and accent discrimination faced by international students, impacting academic and social integration. Redress through pre-sessional English language classes.
- Proposal for collaboration between universities and local communities to support international students, leveraging resources effectively. This is partly premised on the fact that international students may be hesitant to seek support from university services due to concerns about visa and perceived penalties.
- In this context, proposals for universities to fund external organisations to provide specialised support services for international students.

Priorities for local authorities:

- Address overcrowded housing with potential safeguarding issues where children under 18 are co-residents.
- Related to the above, local authorities to work with universities on issues of housing support and licensing. Our discussions highlighted that it is important to recognise that while these measures may address certain risks, they could inadvertently create additional challenges and struggles. The question arises: where would these affected students turn if alternative accommodations are not affordable or available? Implementing measures to alleviate overcrowding may inadvertently leave those with no recourse to public funds unsupported and at risk of homelessness, adding additional challenges for the local authority. Hence, a comprehensive approach that considers the broader implications should be considered when addressing these issues.

- Leveraging support for employment: local employment fairs co-organised by councils and universities
- Support/resource communities of practice.

There was some surprise in our workshops about the extent to which international students are reliant upon **voluntary organisations**. **Priorities for the voluntary sector:**

- Scope for universities to collaborate or fund voluntary organisations who have requisite expertise and/or cultural capital to provide some of the services identified above.
- Potential to provide wrap around services including providing information on wider sources of support including registering with NHS, housing support, child care.