



Kate Allen
Director
Amnesty International UK

By email: steve.valdez-symonds@amnesty.org.uk

10 May 2021

Dear Ms Allen,

Re: New Plan for Immigration: Consultation and Engagement

Thank you for your letter dated 22 April 2021.

I am grateful for your interest in the New Plan for Immigration and accompanying consultation and engagement. The views of your organisation will be an important element of the process as we work to further develop policy proposals.

I note the concerns that you raise in your letter and the accompanying statement and note your intention to make this public. I would like to offer you some further reassurance on these issues. In doing so, I note the response provided by Daniel Hobbs, to the NASF Strategic Engagement Group (SEG) on 19 April 2021 and that further discussions have been had with this group on 5 May 2022.

The consultation on the New Plan for Immigration, which closed on 6 May 2021, is key to informing our proposals for reform and ensuring that we can deliver effective legislative change across the immigration and asylum system. We want to listen to a wide range of stakeholders and sectors as well as members of the public. This is why our approach to the consultation is extensive, offering multiple ways to engage to ensure we can address the needs and preferences of a wide range of participants. This includes via:

- An online portal and questionnaire. This has a series of questions that correspond to the relevant sections of the policy statement. There is also the opportunity to provide more open-ended feedback at various points in the questionnaire to ensure we're capturing full and varied feedback from stakeholders.
- Targeted engagement sessions. These are a series of deep dives with stakeholder organisations. There are eight in total which will be delivered by Britain Thinks, covering each of the main policy areas and a cross cutting theme around equalities considerations. To dovetail these, there are a number of other engagement opportunities being delivered by specific policy teams from within the Home Office and Ministry of Justice.

- Public focus groups. These are a series of public-facing engagements, which will include capturing the views of general members of the public, including those with lived experience of the immigration system.

I have noted your concerns, and wanted to address each of these in turn:

Transparency

You have concerns that there is insufficient detail of proposals, and insufficient details of the effect of those proposals. The New Plan for Immigration publication provides information about the challenges with the current asylum and illegal migration systems, and the Government's intended reforms. We appreciate that these are wide-ranging areas; it is therefore vital that we consult whilst policy is in development. We are keen to understand the views of others, including on how effective key areas of policy may be before proposing legislation and the potential impacts in terms of implementation and impacts on other areas including equalities.

You have noted that alongside the consultation there are some additional engagement events, on which you have concerns about the nature of these; the organisations that have been invited; and how attendees had been selected. I note that Amnesty International have been involved in a number of the Britain Thinks led engagement events that have taken place to date, so hope you will have been able to see, first hand, the importance and value of these. We've been very grateful for your organisation's participation, and that of others. On your specific point about transparency: I am aware that you enquired with Britain Thinks and the Home Office team about the deep dives, and an outline of these was shared with you. I am annexing to this letter that information again, along with the stakeholder organisations involved. Beyond the deep dives, we are also conducting in-house engagement, including on the more technical aspects of the plan.

Accessibility

I note your concerns with regards to the online portal and two questionnaires. As noted above our intention is to gain insight from interested parties. It is important that we consider the different audiences being consulted which we have done. That is why we have provided a more technical questionnaire targeted at stakeholders and organisations with a specialist interest and one that is more general for the public (albeit with the option to answer the wider technical questions, should they wish to do so, or if they have a specific interest or personal experience in a policy area). None of the questions are compulsory, allowing individuals to respond in a way that they choose.

You raise a concern with the downloadable document and its format: my officials have reviewed this and whilst there may be a minor formatting difference between that document and the online portal, the questions that are asked are exactly the same and will be considered in the same way. This does not make any material difference to the questionnaire or the outcome.

Impartiality

With regards to your concerns on the design of the questionnaire and the content of some of the specific questions. I would like to reassure you that, for ease, we have developed the questions to correspond to the relevant section of the New Plan for Immigration publication – this allows for ease of access and understanding. Within each sections of the questionnaire, there is the opportunity to provide more open feedback, ensuring we can capture full and varied insights from stakeholders. None of the open questions are word limited.

The information will provide the Government with the opportunity to listen to a wide range of views from stakeholders and sectors as well as members of the public and will be key in informing our policy development before moving forward.

Equalities

We take our duties under the Equality Act, including the Public Sector Equality Duty extremely seriously and in accordance with our obligations will conduct a substantive Equality Impact assessment ahead of any legislation. This was set out by the Home Secretary in September 2020 in the Comprehensive Improvement Plan - our response to the Windrush Lessons Learned Review and as part of our recent legal agreement with the Equalities and Human Rights Commission.

Earlier this month, the Home Office assured the EHRC that the department will look for and properly consider evidence and feedback from stakeholders to understand the equality impacts of policies and practices. We consider that this consultation is consistent with the assurance we have given the EHRC. The consultation has been designed to provide high quality engagement with all who take part. Many of these participants will have experience and expertise around impacts on people holding protected characteristics and other vulnerable people, and we hope the process will allow the important views of these participants to be shared and further explored. The Home Office will consider the responses carefully in line with their duties as the policy develops in this area.

The questions included within the online portal and the focus on these issues during the additional engagement sessions will allow us to capture feedback on important matters in order to fully inform our own considerations as we formulate the policies further.

I hope this response serves as some reassurance on the matters that you raise.

Yours sincerely,



Chris Philp MP
Minister for Immigration Compliance and Justice



Annex: Deep Dive sessions and stakeholders

Deep Dive	Date	Time	Stakeholders (which attended/are invited)
Session 1: Safe and legal routes review – protection and adult family reunion	Tue 20 April	11:00-13:00	UNHCR
			International Organisation for Migration
			British Red Cross
			Refugee Action
			Refugee Council
			Scottish Refugee Council
			Welsh Refugee Council
			Reset
			Amnesty International
			SMP
Session 2: Integration	Tue 20 April	14:00-16:00	Refugee Employment Network
			Refugee Action
			Refugee Council
			Scottish Refugee Council
			RAMP
			SMP
			Freedom from Torture
			British Red Cross
			UNHCR
			NACCOM
Micro Rainbow			
Session 3: UASC Family Reunion (ISSC Act Duty)	Wed 21 April	11:00-13:00	UNHCR
			UNICEF
			British Red Cross
			Refugee Council
			Scottish Refugee Council
			Safe Passage
			Independent Anti-Slavery Commissioner
			CORAM
Session 4: Asylum Reform	Wed 21 April	14:00-16:00	British Red Cross
			Refugee Action
			Refugee Council
			Scottish Refugee Council
			UNHCR
			Amnesty International
			Joint Council for the Welfare of

			Immigrants
			UK Lesbian and Gay Immigration Group
			Freedom from Torture
			Immigration Law Practitioners Association
			International Organisation for Migration
			Welsh Refugee Council
			Greater Manchester Immigration Aid Unit
			Choose Love
Session 5: One-Stop Process	Tue 27 April	11:00-13:00	The Law Society
			Bar Council
			Immigration Law Practitioners Association (ILPA)
			JUSTICE
			Public Law Project
			Refugee Council
			Scottish Refugee Council
			Welsh Refugee Council
			Bail for Immigration Detainees
			Detention Action
			Centre for Social Justice
			The Salvation Army
			Anti-Slavery International
			Human Trafficking Foundation
			Unseen
ECPAT			
The Independent Anti-Slavery Commissioner			
UNHCR			
Session 6: Streamlining appeals and judicial processes	Tue 27 April	14:00-16:00	The Law Society
			Bar Council
			Immigration Law Practitioners Association (ILPA)
			JUSTICE
			Public Law Project
			Liberty
			Refugee Council
			Scottish Refugee Council
			Welsh Refugee Council
			Freedom from Torture
			Helen Bamber Foundation
			UNHCR
Session 7: Modern Slavery	Wed 28 April	11:00-13:00	Centre for Social Justice
			The Salvation Army
			Anti-Slavery International
			Human Trafficking Foundation

			Unseen
			Hestia
			British Red Cross
			ECPAT
			Helen Bamber Foundation
			Hope for Justice
			Justice and Care
			Migrant Help
			Snowdrop
			Survivor Alliance
			Sara Thornton (Independent Anti-Slavery Commissioner)
Session 8: Equalities	Thu 29 April	14:00-16:00	Bail for Immigration Detainees
			Freedom from Torture
			Immigration Law Practitioners Association
			Amnesty International
			SMPs
			UK Lesbian & Gay Immigration Group
			ECPAT UK
			We Belong
UNHCR			