



# Evaluation of the Living Rights Project

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by





## Table of Contents

Introduction .....	1
The purpose of the Living Rights project .....	2
The main achievements .....	3
Town Hall meetings .....	3
Workshops for professionals.....	5
One stop shop outreach.....	7
Awareness-raising workshops .....	9
Engaging with communities through Community Champions.....	11
Working together within the project .....	13
Increased local partnership working strengthens relationships.....	14
Policy and influence.....	17
The mid-term evaluation’s recommendations.....	19
Transnational dissemination .....	20
Unexpected elements.....	20
The Living Rights conferences .....	22
Numerical summary of achievements compared to targets .....	24
Challenges .....	24
Brexit.....	24
Language barriers.....	26
Difficulties in establishing employment and housing rights .....	27
Non-licensed providers of immigration ‘advice’ .....	28
Increase in demand for follow-up work in complex cases .....	29
Lack of funding/resources to meet current and future needs for legal advice.....	29
Administrative and bureaucratic challenges.....	30
Cultural challenges.....	32
Ethical issues .....	34
Short term impact.....	36
Longer term impact .....	37
Sustainability.....	38
Funding applied for.....	38
Material resources .....	39
Human resources.....	40
Replicability and scaling up .....	40
What next? .....	41
Conclusion .....	41
Summary table of recommendations .....	42
Appendix.....	43



## Introduction

In 2015, the Law Centres Network was successful in securing funds from the European Commission's Directorate General Justice (DG Justice) under the Rights, Equality and Citizenship Programme. The Living Rights project was developed in response to the call for proposals for action grants to support national and transnational projects aiming to promote Union citizenship. It was a collaboration of two national and nine regional agencies which provide information and advice to mobile European Citizens in UK.

The main objective of Living Rights was to foster the successful inclusion and participation of mobile EU Citizens in the United Kingdom by promoting citizenship rights, access to services including healthcare, and supporting EU citizens to overcome the multiple barriers facing them as individuals and communities.

The project ran from December 2015 to November 2017. The complete list of partners (including those who left or joined part-way through) was:

- ☞ Law Centres Network (lead body, national)
- ☞ New Europeans (national)
- ☞ East European Resource Centre (London)
- ☞ Ipswich and Suffolk Council for Racial Equality (ISCRE) (East Anglia)
- ☞ Lambeth Law Centre (London)
- ☞ Polish British Integration Centre (PBIC) (Bedfordshire)
- ☞ Central England Law Centre (West Midlands)
- ☞ Derbyshire Law Centre (East Midlands)
- ☞ North East Law Centre (North East England)
- ☞ Ethnic Minorities Law Centre (Scotland)
- ☞ Harrow Law Centre (London).

This report is the concluding part of the second of the two independent evaluations. It is intended to be read in conjunction with the mid-term report<sup>1</sup> by Access Europe Network, in order to avoid repetition of its content.

## Readership

The readership of this report is anticipated to include, as a minimum:

- ☞ EU commissioners.
- ☞ LCN and its partners within the Living Rights project.
- ☞ LCN's member Law Centres.
- ☞ Solicitors and barristers interested in immigration and human rights.
- ☞ Policy-makers in the UK.
- ☞ Readers of LCN's website - eg grant-making trusts, advice agencies.

## Who carried out the evaluation?

One of the expectations of EU funding programmes is for grant-holders to extract as much learning as possible from their projects, and to share it throughout the EU. Independent evaluations are therefore crucial - for the grant-holder, the EU commissioners and for the wider readership in similar projects across Europe now and in the future.

The first evaluator was Access Europe Network, which carried out the midway evaluation in Oct-Dec 2016. After AEN was unable to continue due to changed circumstances, LCN appointed RZ Hankins Consultancy to evaluate the second half of the Living Rights project.

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<sup>1</sup> This document can be sent by LCN upon request.

Rachel Hankins (author of this report) is an experienced consultant and evaluator. After a decade managing various charities, then being in charge of grant-giving in two Local Authorities, she went freelance in 2007 to work primarily with charities and social enterprises across England and Wales. Her consultancy for the legal advice sector maintains a fresh approach by being informed by her work with organisations operating in diverse fields including criminal justice, social care, domestic abuse, peer mentoring, substance abuse and mental health.

## Methodology

Because the mid-term evaluation focused mostly on quantitative data and the mechanisms of setting up and managing the project in its first year, the final evaluation was designed to complement this approach by concentrating more on qualitative information, what worked and evidencing the short term impact of the Living Rights project on its beneficiaries.

Methods used in the final evaluation included:







-  Semi-structured phone interviews with all partners (2 responded in writing rather than phone calls). The set of questions can be seen in Appx 1.
-  Phone interviews with the lead body's Director and Project Officer.
-  Phone conversations with several volunteer Community Champions.
-  Reading monitoring reports and evaluation sheets from beneficiaries (professionals and migrants).
-  Participant observation at the Living Rights conference in October 2017.

All the quotes presented in green boxes throughout this report are verbatim from conversations with, or written information sent to, the evaluator. Recommendations appear in pink boxes and are summarised at the end of the report.


The mid-term report listed the partners and scrutinised the delivery of their activities in the first year by analysing the numbers of EU citizens, professionals, events and materials. This report updates those figures to show how closely the project met or exceeded its targets.




## The purpose of the Living Rights project

This project was designed to tackle the following problems:

-  Low level of access to services by EU citizens living in the UK, to which they are entitled.
-  Low voter turnout by EU citizens in UK and EU elections.
-  Complex problems faced by new arrivals to the UK from the EU which are not simply resolved with information but require multiple agencies' input and/or legal advice.
-  Complex official procedures.
-  Un-coordinated provision of support at the local level and lack of knowledge by professionals and public officials of EU citizens rights and status here.
-  Concern about the lack of workers' rights eg migrant worker exploitation.

Target groups were:

-  Newly arrived EU citizens, those living in the UK for up to 3 years but experiencing the problems listed above. The project was extended to meet the needs of those living here for over 5 years where problems establishing rights or lack of knowledge about their rights continued.

-  Public officials, professionals and third sector workers whose employing organisations operate under government contracts.
-  Local politicians.
-  Practitioners from local agencies and EU policy networks, to feed into intelligence and data-gathering on the systemic barriers to EU citizens in the UK.

## The main achievements

The mid-term evaluation report set out the achievements in terms of numbers of beneficiaries and events in the project's first year. The first section of this report compares the outputs and activities in the second full year with those numbers to establish whether the project delivered the overall target of activities and outcomes.

### Effectiveness of the delivery mechanisms

The Living Rights project deployed four key delivery mechanisms designed to engage with EU citizens and communities in the UK and with civic officials: town hall meetings, workshops for professionals, one stop shop outreach and awareness-raising events.

All these events and meetings took a lot of time and effort to organise, and were sometimes quite challenging for partners who were more accustomed to dealing with people seeking legal advice in person at their organisation's front door or drop-in service. Council officials and elected Members were not always willing to participate and often had to be persuaded to engage. New Europeans observed that:

"Local politicians – ie Leaders of councils, MPs and Mayors - were quite reluctant to speak, or speak out on Brexit, at our events - with the exception of Ipswich and Bristol."

Individual EU citizens and communities were equally difficult to engage with at first - but for different reasons, including lack of understanding of English, mistrust of anyone 'official' (including voluntary sector/charitable bodies), and the fear of being recorded by officials as present at such meetings. As will be further explained later in this report, the main method of successful engagement of individuals and communities was the use of voluntary Community Champions who were EU citizens themselves.

Despite these difficulties, Living Rights partners succeeded in meeting the majority of its targets and exceeded delivery on the awareness raising target, civic participation and Community Champions targets. Those which had been low in Year 1 were caught up in Year 2. The careful design of the four different types of meeting or engagement meant that both the intended groups of beneficiaries (civic officials and citizens) had suitable opportunities to engage with the project and, just as importantly, with each other.

### Town Hall meetings

A total of 6 civic participation events (town hall meetings) were put on in the two year period. This compares with the target of 7 such meetings. However, the target number of individuals intended to benefit from these was set at 235 and the Living Rights project achieved a total participation of 312 across its 6 events - thus greatly exceeding the target.

The partner tasked with the job of organising these meetings was New Europeans. Based in London, they travelled around the UK to ensure availability in a diverse range of locations in England and Scotland.

Living Rights partners reflected on the success and usefulness of these meetings as follows:

"The numbers of EU migrants who attended provided evidence of a need amongst EU migrants living locally for a source of ongoing, practical information about their rights during and post Brexit."

"Our Town Hall meeting had 100 people attending! A lot of people who came are now getting immigration help one-to-one. Politicians needed practical guides."

"New Europeans worked well with us, and our Community Connector was the interpreter at the Town Hall meeting."



"We did two Town Hall meetings. People from the Romanian Government and a delegation from Romania came to the first one, plus our local Council officials, Councillors and local people. The second one we did with New Europeans and a member of the London Assembly was well attended."

"It was a great start in establishing mutual respect between migrants and professionals, which was seen in a Brexit debate recently organized in Luton Town Hall which we were a part of."

One partner reported on some entrenched attitudes amongst Council employees, which the Town Hall meeting helped to overcome:

"In Romania it is acceptable to hit children. Here a lot of Council people see them as a big problem – they don't put their rubbish in the right bins and they hit their kids. But a lot of Romanians are in fact working in skilled jobs."

The Town Hall events received good media coverage, including:

-  BBC Suffolk covered the New Europeans town hall event in Ipswich.
-  The large public meeting in Bristol was covered by BBC Radio and ABC (the Australian TV and print media company).

Feedback from participants at Town Hall meetings was mainly positive, with comments from Council officials and other civic employees such as:

"Huge thank you to Bella and Sue at New Europeans for all their hard work. It would not have happened without you! Well done everyone, great success and I am looking forward to our next event in the East of England!! Let's keep the momentum going. Let's do our best to provide a platform where all citizens, including EU nationals, have a voice. Last night was a great start! We must build on it."

"Keep up the good work and let's keep making all our communities better."

Meetings with public officials, including Embassy and Council staff, opened up new channels of communication and produced opportunities to return to Councils to provide specific training on EU citizens' rights for their staff. Many examples of this were given by partners, including these two:













“The Romanian delegation found out about civic services, advice provision and how Councils work. The Romanian Minister for Social Affairs met the MP. Local people heard about services eg Law Centres. Social Services talked about children and that they were not there to take their children away – there was a lot of mistrust.”

“Although we didn't do a Town Hall meeting as such, we engaged with a forum for public officials and have contact with the Council, particularly the housing officers. They talk to me on a case-by-case basis. We will be doing basic training for them soon.”

## Workshops for professionals

The workshops put on in the two year period attracted 770 delegates. This exceeded the target attendance of 604. Professionals included those working in:

-  Jobcentre Plus
-  Local district, borough and county councils
-  Healthcare services
-  Social and social care services
-  Police
-  Business
-  Housing associations
-  Education
-  Legal system
-  Voluntary sector/charities.

When asked by the evaluator about the results or outcomes of these workshops for their intended beneficiaries, partners provided a plethora of examples to show their effectiveness:

“We received excellent feedback from all the workshops for professionals which we delivered. Luton Borough Council recognised the importance of raising awareness of EU Migrants rights amongst all their frontline staff and invited us to deliver 3 separate workshops to their staff, in order to meet the high demand. Attendees came from a wide range of the council's departments including social services, housing officers, income officers, and children centre family workers. Many of the attendees reported that the knowledge gained would be invaluable in enabling them to better support their clients. Many had very limited prior knowledge and understanding of Right to Reside and Habitual Residence requirements.”

“I carried out workshops for public officials including staff at CAB, Womens Aid and Birmingham City Council. These will hopefully enable the staff to have more of a knowledge of the rights of EU nationals and enable them to make correct decisions on entitlements – for example, it has given staff at Womens Aid the confidence to challenge a decision on housing benefit that may mean the difference between accepting a women into a refuge or not.”

"We believe that, with the workshops to professionals, we have made a substantial impact by significantly improving key practitioners' understanding of these important areas of EU law. This in turn can only improve access and quality of services provided to migrants by the local authority key staff."

"We did loads of workshops for anyone on 'public money' eg colleges, housing advice group, Bangladeshi group, East of England LGA, the Borough Council, voluntary organisations. We over-achieved our targets."

"Housing officials at the Council were very appreciative because they were confused about who is entitled to housing or not."

"Not exactly public officials, but we did 'right to rent' talks to landlords."

"The public bodies didn't know the correct rules and which groups they apply to. We hope they do now."

"Officials have misconceptions about eligibility and the myths about accessing services. They needed case studies."

"We did two workshops for public officials. Police and the Home Office came to one. It was useful to talk about issues faced by our communities."

"We have skilled up public officials and other NGOs about the rights/responsibilities of EU migrants and this has improved decision-making in many cases, though much more on this area is needed."

The evaluator asked a further question to ascertain whether partners had noticed any knock-on benefits for EU citizens from professionals having more knowledge. Five partners spoke about the positive changes they had subsequently noticed in the practices of public officials and other professionals:

"We have had continued contact with some of the professionals who attended the workshops, seeking to make referrals to our drop ins. Anecdotally, it was clear that these individuals were now recognising incorrect benefit decisions better as a result of gaining an understanding of right to reside status."

"Migrants have more confidence in challenging agencies and the agencies themselves are making more informed decisions – leading to less evictions, for example if Housing Benefit can be claimed."

"In Brent, the public bodies are taking it more seriously and it made a difference."

"They [Council officials] understand migrants' rights better and instead of passing them round, they know there is one place to send them - ie our outreach point."

"We are taken seriously by the Council. We're seen as a bit of a local expert. I find now, if I tell the Housing Dept that Mr X has status in the UK and has got rights, that carries weight."

The feedback forms completed by professionals attending these workshops gave similarly strong evidence of good outcomes, the collated percentages show that high proportions agreed or agreed strongly with the following statements:

I now feel I understand EU citizens' rights in the UK better.	90%
I now feel I understand EU citizens' barriers to accessing their rights better.	93%
Overall, I consider that the session has been useful to me.	100%
Do you come across many EU citizens in your profession?	76% yes

Their written comments in the evaluation sheets expressed many benefits:

"It was really well presented, I liked the examples given to exemplify policies in practice."

"As someone with limited knowledge, this was very informative."

"Very interesting, I did not know this much about EU nationals before."

"The session was helpful and has increased my knowledge in EU citizens rights significantly."

"Very helpful in discussing live issues, learning about changes and for networking."

"It made me aware of what I need to look out for before moving forward with my advice."

### One stop shop outreach

The one stop shop sessions were the place where individual EU citizens could receive brief information and advice on the spot, or be appropriately referred on. Even before Brexit, it was difficult to restrict information and advice to being brief, as most EU citizens approached the advisers with more than one issue, many of which proved to be complex. 1,993 people benefited directly from one stop shop sessions, compared to a target of 2,220. The reason the total number of beneficiaries was lower than the target (by 227 people) was because one-to-one advice took a lot longer than initially envisaged because people's problems were often of a legal nature and required individually tailored, not generic, advice rather than information-giving.

Adding to these numbers, it is reasonable to estimate that indirect beneficiaries could have formed at least 50% of that number again, as many of those receiving advice said they had passed it on to relatives or friends in their communities in similar situations. Partners and children would also have benefited.

The Law Centre partners could usually signpost internally for certain areas (legal advice on housing, benefits, health) or to other advice providers eg Citizens Advice for generalist advice on non complex matters. However, it was very difficult to signpost or refer individuals with employment or immigration issues due to the shortage of organisations providing free support on these, and the requirement to be licensed by the Home Office to give immigration advice. Partners such as the Polish British Integration Centre and the East European Resource Centre (whose staff and volunteers spoke languages other than English) were visited by many EU citizens seeking information, who said they did not want to go to the local CAB as they felt intimidated when trying to explain their problems in English.

When partners could not signpost on or give only brief advice, they then dedicated significant amounts of time to meeting the needs for legal advice in such subjects, outside of the EU funding for this project. Much added value therefore was accrued. Examples included:

"We were expected to deliver everything because people didn't want to be sign-posted."

"We signposted many clients to external partners including local family lawyers and Luton Law Centre for immigration cases."

"We provided a specialist advice service in-house, and follow-up services for a significant number of EU clients who needed welfare benefits and housing casework."

"We always advise people in work to join a union if possible to assist them with issues at work – we also direct people to services either within our Law Centre or to other community partners that we believe are able to assist – for example, we now have an immigration adviser at the Law Centre but we didn't at the start of the project so referred to the Refugee and Migrant Council if it was an immigration issue."

"People wanted straightforward information on Right To Reside. We planned to do employment and benefits, but we didn't get asked for topics like that. People didn't think 'I'm an EU citizen therefore I have rights, including employment rights'."

"We managed to set up a meeting for a couple of community groups with a pro bono student law clinic in a city outside our Law Centre catchment area, instead of them having to come all the way here."

"The main success of providing the outreaches was that we were able to see and support a significant number of additional clients. We provided over 300 individual one-to-one advice sessions to over 200 individuals across Bedford, Luton and Northampton. In many cases the one to one interventions led to internal referrals for ongoing casework support provided under our Lottery funded advice (assisting clients to successfully challenge benefit decisions in many instances) and for support into employment and ESOL enrolments. As such, the drop-ins provided a good pathway for us to provide much more than just one-off advice about migrants' rights."

Only one partner reported that one stop shops did not work as a delivery method in their locality, where only two people attended. Finding appropriate venues in the more rural areas was difficult, and the migrant population tended to be dispersed over a larger area than in towns and cities, which also had the benefit of public transport.

Overall, the one stop shops were successful despite the inherent challenges of the complex subject matters, using a variety of community venues and overcoming the language barriers:

"These sessions do result in people gaining the benefits or housing they are entitled to which is obviously a positive outcome for the Law Centre and the EU national."

"We've done loads of one-to-one advice for EU migrants on homelessness and right to reside for young people."

"We did sessions after the workshops for 30-60 minutes for people who had questions. They could see us there rather than travel to Hammersmith another time."

"Time was a challenge – it's a nightmare to apply for status, so we ask them to fill in as much as they can before they see us, but they can't because their English is not good. They have to come back several times. Some of the community venues we used were small and it was difficult to talk confidentially there. But the clients got the service nonetheless."

The benefits to EU citizens from attending the one stop shops were, as two partners explained below, "real and tangible" and improved people's emotional wellbeing or happiness as well as their finances:

"It has made a big difference and there is now a lot less confusion in the Eastern European communities in this city."

"People now know what to do post Brexit to protect their position so they can go about their normal day to day activities without fear."

"The benefits to our clients were real and tangible, with the vast majority reporting that they received information and advice which helped them to better understand their rights and know how to take action to enforce their rights, particularly around understanding their benefit and pension entitlements, and housing and Council homelessness duties."

"They were more aware of their rights and entitlements and so ended up both financially better off and emotionally a lot happier – we could also try and reassure them of their rights post Brexit."

### **Awareness-raising workshops**

A total of 1,300 beneficiaries attended the awareness-raising workshops put on in the two year period, This exceeded the target of 1,098 people.

It was soon recognised by partners that putting up posters or inviting people to come to a workshop in partners' own premises was not working well enough to attract good numbers, so they went out to where EU citizens tended to gather including ESOL classes, community centres and churches. This required considerable flexibility by staff, who found themselves working on Saturdays, Sundays and week nights to ensure they reached the working population in particular.

The challenges and successes of these workshops were explained in detail by partners, some illustrating great creativity in their approach to working with mixed groups of migrants:

"I overcame the challenges in several ways: simplifying and reducing the amount of information to be given by focussing on where to find help and information; working with and engaging with all participants especially where the sessions were at ESOL providers; providing handouts in different languages; creating a 'who wants to be a millionaire' quiz as part of the presentation - so that all participants could work together, in a low-pressure and enjoyable way, to answer quiz questions about the earlier presentation, which helped build confidence."

## And furthermore:

"We did a general overview of employment law at awareness raising sessions or workshops and said we can do presentations on immigration, employment. With housing and benefits, we gave leaflets and referred them on. When people first asked for a talk about Brexit and their rights, they then asked for one on employment afterwards, so we did advice sessions at the one-stops as a result of that."

"The challenge was the sheer breadth of information to be covered in a general AR session- across issues about work, housing, health services, driving, immigration, etc. And to cover technical legal issues for audiences with differing skill levels in understanding written or spoken English."

"The awareness raising sessions were an extremely effective way of disseminating much needed information to groups of people. The greatest area of interest here was (unsurprisingly) around Brexit."

"We were not getting requests for information on how to register to vote or get health access, but we printed off information on those. We got benefits questions sometimes. But more on bad employment practices as EU citizens are disproportionately affected by the gig economy so exploitation of migrant workers was often brought up."

"The main success was around quicker advertising of the project and the rights of migrants as European citizens. Bilingual delivery was undoubtedly a very effective tool removing a barrier for many migrants to access advice. We've increased participation as the events attracted several volunteers to support our service."

"We tried doing these session in English and almost no one attended. That was no doubt because if you speak English, you can easily access the information."

"We avoided doing awareness raising on immigration in a group as everyone needed one to ones."

"Building up the relationships with the community groups took time – we couldn't just parachute into an area and put on awareness sessions – they had to be done in conjunction with organisations that were already working with and had the trust of the local EU communities – being clear in what advice we could give (particularly around immigration for example) being clear that we don't know exactly what will happen after Brexit – making sure there were interpreters there, doing them at a time that would suit the local community – so evenings and weekends."

"Successes were that we saw good numbers of people – and also managed to give one to one advice afterwards – and that we managed to reassure many people who are worried about their rights after Brexit."

"Going to ESOL classes is a good way to get people talking about practical things."

The outcomes and results from these awareness-raising sessions were very positive:

“People working in chicken factories now understand their rights – they know if they had an accident, they can come here and have a lawyer.”

“After each session, up to 50% came forward for one-to-one advice, most often on employment law.”

“We don't know if people have asserted their employment rights or not. I have done letters for community centres to collect for people to give their employers, so some did challenge. We can give people advice and information but there is no funding to do it for them.”

“Everyone learned something as this information is not well known in the Romanian community – people didn't have any idea.”

“Yes, a few have challenged doctors' surgeries but I don't know how many.”

“Most people didn't need much help – just to know what documents are suitable and do they qualify.”

One Hungarian group communicated great appreciation in an email:

“I would like to take this opportunity to thank you for the immigration and citizenship session you delivered for the Hungarian East Midland Society. This event has brought us all closer to understand the law. We appreciated your unfailing attention to detail. Several participants commented on how good and informative the event was. We are fortunate to have you donate your time on occasions like this. Once again, on behalf of the Hungarian East Midland Society, thank you.”

### **Engaging with communities through Community Champions**

The key to the effectiveness of partners' engagement with communities and abilities to penetrate otherwise hard-to-reach groups of EU citizens living in the UK was undoubtedly the use of Community Champions (CCs). These were volunteers recruited for their language skills (English and at least one EU language), community connections and ability to reach out and engage with people. Some partners had more than one CC, with 18 being the largest number in a partner organisation. A partner with 9 CCs firstly appointed a co-ordinator to go out and recruit volunteer champions from a wide range of EU communities in the locality. The target of 8 CCs was exceeded as a total of 33 were recruited and deployed.

Partners were enthusiastic when talking about their CCs with the evaluator. The first set of quotes below describes CCs, their practical contributions and their unique volunteer role:

“My Community Champion is a 2nd year law student at university who is a dual Polish/Canadian national – it has been very helpful to have her as the community champion to assist with day to day aspects of the project – attending advice sessions, meetings and planning events, but also having her assistance with the language and helping to access the Polish speaking community.”

"When we applied to do this project, we knew we'd need someone to cultivate the communities to complement our legal role. Our CC has good skills for reaching out to communities who don't know that they need to know things or engage."

"They did all the preparation, finding the communities, identifying their needs, booking venues, organising refreshments – ie everything so the Law Centre solicitor or other specialist could turn up on the day and deliver."

"We have nine CCs in total. You can't impose normal volunteer requirements on them as they won't or can't comply as many are working two jobs as well."

"We have Community Champions, ie volunteers, who are more engaged than the average European living here. They would speak at these and other events; they would represent us at events organised by others - eg the Democracy Fair in December 2016 at the LSE; they would take press and TV interviews where possible."

"One of our CCs supported our drop-ins and events in Bedford and provided mentoring to our Bedford clients."

"Our CC did some informal interpreting and helped get feedback about events."

The following quotes illustrate how CCs were able to find and engage with EU citizens and communities, which in turn enabled partners to understand specific needs and tailor their approach to best meet them:

"Our CC has good skills for reaching out to communities who don't know that they need to know things or engage."

"Our CC found Romanian-linked churches, schools, stores, community centres etc, and built a database of contacts. He told them about our events and asked them to help promote them and join in too. This produced good take-up: 30, 40 or 50 people to each one. He talked to other charities and Council officers."

"CCs were very helpful – they found out about need as soon as it happened and helped us tailor our response accordingly."

"Our CC speaks lots of languages including Polish, so facilitated contacts for me. She helped set up meetings with groups eg the Hungarian Society and Romanian groups, which led to doing workshops and advice sessions for them."

"Our CC helped to galvanise the Romanian community as he is an active member of it, and facilitated particularly Romanian and Bulgarian people to attend our seminars. He provided information on the Living Rights project to the Foodbank as there has been an upsurge in the number of Romanians using it."

"The Champions highlighted the key issues faced by the community, spread the word about the project and encouraged take-up of one-to-ones and workshops."



“We had 2 Community Champions: one in Bedford and one in Luton. One helped us to access the Romanian community in Luton, a group which we had only marginal contact with prior to the project. Following training and mentoring by Polish British Integration Centre, she provided individual one to one support to several Romanians living in Luton. She has been inspired by the project to launch a support charity for Romanians in the UK, mirroring the kind of work which PBIC does for our clients.”

CCs clearly helped partners to be highly responsive to local issues as they emerged. Nearly all partners plan to keep the CC role and expand on it with other communities of interest to increase their in-reach and ability to engage with vulnerable people who don't know that access to justice is freely available to them in their local area.

Community Champions interviewed by the evaluator were all extremely positive about their roles, about being accepted and welcomed into the partner organisations' teams and being able to do something to benefit others from communities as well as their own:

“I've benefited from being a Champion because it gave me the power to work hard and help others. It will help me get a job to have worked here. I do it with pleasure – for me, it's like my family and my home. I like what I'm doing.”

Only two partners did not manage to recruit Community Champions:

“We didn't have one, but it would have been helpful.”

“We didn't have one in the end. At the Living Rights meeting, partners with Champions said it helped broker understanding of the project.”

The majority of Champions intend to continue volunteering with their host organisations.

### **Working together within the project**

The Living Rights project was designed as a response to issues that were coming to the attention of LCN from its member Law Centres working at the grass-roots across the UK. LCN intentionally included other organisations with similar aims and values, but different skills and complementary services, into this project in order to enhance the joint offer and maximise learning by working in a broader partnership.

The evaluator asked about the value of collaboration within the Living Rights partnership and received many positive responses (the few more negative responses are included in the Challenges section further on in this report):

“We regularly discussed the project's achievements and challenges. We had opportunities to be involved at conferences and share our practice. We benefited greatly from the shared folder, with presentations created by other partners which we were able to adapt for our use.”

“It was good to work with organisations outside London, we're keen to talk to other Law Centres now.”

“It was very useful to attend the meeting and conference in London and to share ideas face to face. It was also helpful to use the training materials both from Living Rights Project and from other partners who placed materials in Dropbox.”

“We worked with New Europeans – they were at two of our events.”











“We shared our resources: we shared translated feedback forms with several partners.”

“It has permitted us to engage with professional lawyers who can illuminate issues for our members: Law Centre staff are extremely knowledgeable and committed so it is great to work with them when we can.”

“It was good having meetings together. It was uplifting to have a shared vision and to talk about something we all felt passionate about. We all bought into it – it was not just a project.”

### **Increased local partnership working strengthens relationships**

Outside of the Living Rights partnership, the project depended upon partners using, or creating, relationships within their local communities with those as diverse as:

-  grass-roots groups
-  churches and other faith groups
-  schools (to reach EU citizens who were parents, usually attending ESOL classes)
-  colleges and universities
-  other voluntary organisations
-  solicitors in private practice
-  private companies
-  Councils, mayors and other public bodies eg police
-  Unions and ACAS
-  for those in London in particular, government departments.

Partners were delighted with the results of their efforts to connect with new partners or strengthen existing relationships in their local communities:

“We have improved relationships with local community groups such as Ipswich Community Media and Ipswich Community Church and providers of ESOL classes such as West Suffolk College, two primary schools and an Academy.”

“The project has allowed us to strengthen our relationships with local councils, CABs, Luton Irish Forum and member organisations of the Bedfordshire Advice Forum. Our workshops to professionals delivered to these groups helped to widen our sphere of influence and we have seen a subsequent increase in numbers of clients referred from these partners.”

“We are now working closely with organisations such as the Polish Ex-Pats Association, EMCONET [Emerging Communities Network], the Czech and Slovak communities and the Romanian community. We have been working closely with organisations such as CAB, SIFA Fireside, Homeless Link and Womens Aid.”

“Living Rights has allowed us to expand our relationships geographically”

“It has strengthened our offer with politicians as we bring experts to the table for discussions.”

“We discovered some agencies giving advice without OISC qualifications – we said they should not do that, so now we've got their clients.”

“It definitely has benefited us. We managed to reach groups who had never heard of us. We did proper outreach to Saturday schools and churches mostly.”

“We collaborated with the union Unite and the organisation EELGA on their own EU funded projects.”

“We have better relationships and earlier contact with the newer EU migrants. Much of the early awareness raising was embedded into ESOL classes and health awareness outreach being delivered by other organisations. This has improved our knowledge of and relationship with these providers so we can collaborate again when resources allow.”

“It's widened our links, appeal and profile. We now have private companies offering to pay us to do sessions for their staff. The universities didn't want to know before Brexit, but they do now. Our issue is capacity.”

### **Increased reach into migrant communities**

Apart from the partners whose organisations were set up specifically to support EU citizens (ie the Polish British Integration Centre, East European Resource Centre and New Europeans), the other six partners reported that the proportion of their client base formed by EU citizens increased markedly during the project. They expected this to continue as they have now become known within many EU communities as a source of legal advice on immigration, employment rights, benefits and housing - as well as for giving talks on citizenship matters eg access to healthcare, voting rights etc. The first quote below characterises the speed with which EU migrants appear to hear about their local Law Centre now the project is reaching into their communities effectively:

“We always had a lot of immigration enquiries but not from EU migrants. Now people know about us on Day 3 after arriving here but before it would have taken 2 or 3 years.”

“We have increased our reach to EU migrants. Whilst this may well have happened organically, the project gave the capacity and resources to deliver increased demand for legal information, primarily in immigration.”

“Thanks to this project we had an opportunity to deliver much needed one to one support to our clients at our existing and new outreach locations. Our project officer was able to join our advice team, effectively doubling the number of clients we have been able to see at each outreach session.”

“We did already advise EU nationals in welfare law and immigration and housing across the whole Law Centre but this project has enabled us to see far more individuals in the city – particularly in the areas of welfare benefits and housing.”

“We already had good relationships. The Roma Support Group link is promising.”

“It was a meaningful project, it helped us build relationships with organisations that we didn’t know. Now they feel more integrated in the life of the city as a result. One Russian-speaking group said our talk was the best workshop they’d ever been to.”

“We had not dealt much with Roma people before, some Hungarians and Romanians. Now we’re thinking more about working with Roma.”

“EU migrants had turned up at our Law Centre before with welfare benefits or immigration or employment issues, but we had not seen these as a group of related problems. Living Rights has enabled us to be more holistic.”

The final quote above shows that the project changed one Law Centre’s way of seeing what had appeared to be single issues as, in fact, a group of issues commonly affecting EU citizens in the UK.

### **LCN’s role as lead body**

When the evaluator asked each partner to rate LCN’s leadership and support to them, the responses received were mainly very positive:

“I have managed a national EU funded partnership project before, and I think Laura did a really great job on this project. It’s not an easy task, and she handled everything smoothly.”

“It’s all been done really well, very quick responses from LCN and facilitating things well.”

“Laura and Julie did a fantastic job.”

“Laura did a brilliant job. We were left to our own devices quite a lot and needed a prod from time to time, but it’s difficult to say whether LCN being more hands-on would be good or not. I had regular contact with Laura.”

“The support has been brilliant.”

“They were really good at support. When I worked in a specialist unit in Citizens Advice, they didn’t give that level of support. LCN is good because it is small. In CAB, I felt we were not aiming for the same thing as the management. It’s not the same with Julie – LCN’s Director, who is really accessible and supportive.”

Negative comments focused mostly on the materials and written resources provided by LCN for partners to use with and distribute to beneficiaries, and two partners expressed the wish for meetings outside London:

"Earlier provision of materials and they need to be much simpler in content for non English speakers."

"LCN could have created materials earlier and more collaboratively."

"The use of Dropbox for sharing documents and group emails were helpful but not everyone used them. LCN could have enforced that more."

"I don't think dropbox works well for sharing reporting documents, but that's a small issue."

"LCN did a good job by and large. The failure of Law Centres to engage our group as much as they should in awareness raising events was a worry. We would have appreciated a bit more technical support e.g. to ensure our materials were accurate."

"3 or 4 meetings in London was quite a commitment for us, but I don't know how else you'd do it – phone conferences are not satisfactory, maybe smaller regional groups?"






"More face to face meetings in different parts of country rather than just London."

In terms of collaboration, the Living Rights Project Officer did, in fact, ask the partners for help with deciding on the content - particularly the Law Centres due to their relevant expertise. When no offers of help were forthcoming, she created the documents herself and paid consultant solicitors to review them.

## Policy and influence

A key part of the project was to ensure the link between experience on the ground of the needs of EU citizens and relevant policy-makers, in order to use the evidence gathered to inform and influence policy developments at a national and Europe-wide levels.

To that end, LCN as lead body attended and made representations at an impressive list of events, including:

-  A discussion on Romanian-British Partnership and community engagement in tackling labour exploitation at an event organised by the Embassy of Romania in London, the Independent Anti-Slavery Commissioner and the Gangmasters & Labour Abuse Authority.
-  New Europeans' and London Assembly's joint event European Voices to present evidence of the impact of Brexit on London-based EU nationals.
-  A round-table event with the Department for Exiting the EU, the Treasury, DWP and civil society organisations, on the impact of the loss of EU funding on equality and human rights work. LCN was a speaker and presented the Living Rights project as an example of where EU funds have proven vital to work on equalities and human rights in the UK. The ensuing report will be published shortly on Equality and Diversity Forum's website.
-  A Paul Hamlyn Foundation event on the impact of Brexit on EU children and young people, where LCN presented Living Rights project findings and recommendations for the future.
-  LCN's Project Officer represented the project, its beneficiaries and partners at several government Select Committees and All Party Groups on relevant subjects.

- ✿ LCN was approached by Migrant Voice and a professional from Coram/Greater London Authority, to exchange information and establish contact. This laid the ground for potential future partnership work.
- ✿ Strategic litigation was used successfully<sup>2</sup> by one Law Centre partner to challenge the Home Office through judicial review of several cases involving homeless EU citizens - as explained in the quote below:

"Two bits of work dovetailed for us – we had other money for street homeless migrants, not just from the EU. When the government enacted Right to Reside in 2016, the Home Office changed the regulations and said rough sleeping was a misuse of treaty rights – but it is not! Marrying someone from Russia to bring them into the UK is a misuse, but not having a house is not a misuse! We wanted to challenge this and brought our first case, and are at Judicial Review with 3 or 4 cases. Without the Living Rights focus, we wouldn't have had the contact or knowledge and trust amongst the street homeless to have the contacts to get started on the strategic litigation."

Since June 2017, Living Rights' policy activities and influence continued:

- ✿ LCN became part of European Citizens Action Service's (ECAS) and Citizen Brexit Observatory (CBO) initiative. The CBO is a partnership project to support the fair treatment of EU citizens living the UK and UK citizens living in the other countries of the EU.
- ✿ In July, LCN gave evidence to the London Assembly EU Exit Working Group on the advice needs of EU nationals in London and on best practice on reaching those who are more isolated and more vulnerable.
- ✿ In October, LCN was invited to Brussels to present on a panel on best practice to foster political participation among EU nationals, as part of the European Week of Regions and Cities which gathers best practice lessons from EU-funded projects throughout Europe.
- ✿ In November, LCN took part and gave evidence to a round-table event by the Greater London Authority, on EU and third country nationals living in London who will be affected by the UK's exit from the EU and who are especially vulnerable to marginalisation.
- ✿ Also in November, LCN contributed to the 'Brexit and Local Communities - A London study' commissioned by Jean Lambert MEP. Two of LCN's completed EU projects were provided as examples of the way in which EU funds have helped communities in London access relevant services in times of change.
- ✿ November: LCN took part and gave evidence to a roundtable event by the Greater London Authority, on EEA and third country nationals living in London who will be affected by the UK's exit from the EU and who are especially vulnerable to marginalisation.
- ✿ December: The Supervising Solicitor of the EU Rights Clinic in Brussels invited LCN to be a signatory for a letter addressed to Michel Barnier outlining some groups of individuals who are particularly vulnerable as a result of Brexit and who should not be left out<sup>3</sup>.

<sup>2</sup> <http://www.lawcentres.org.uk/policy/news/news/press-release-deporting-eu-rough-sleepers-unlawful-high-court-rules>

<sup>3</sup> <http://ecas.org/wp-content/uploads/2018/01/Letter-to-President-of-European-Council-Brexit-25.01.18-FINAL.pdf>

- ✂ January 2018: Law Centres joined scores of other organisations and individuals in calling on Donald Tusk to clarify and protect the status of groups of EEA nationals in the UK, following the first round Brexit deal agreed the previous week<sup>4</sup>:

All these activities will clearly contribute to the Living Rights project’s longer term influence, which is further explored towards the end of this report.

### The mid-term evaluation’s recommendations

The mid-term evaluation report written by the Access Europe Network included three recommendations, which have been set out in the first column of the table below. The evaluator sought evidence that these had been implemented, and has included the Project Officer’s response to each one in the table’s second column:

	<b>Recommendation</b>	<b>LCN’s actions in response</b>
1	To mitigate the risks associated with staff turnover, we recommend that the lead partner provides additional support to those staff members who are taking over the project responsibilities in affected organisations. This should include information and guidance with regards to the claim process, reporting requirements and eligibility of costs.	I had at least one face to face meeting with new project partners at their premises, and provided prompt over the phone and email support afterwards. I gave new partners access to a shared dropbox file where all forms, budgets, examples of reporting, templates for events, materials for participants and other materials which make reporting and project management easier are centralised. This has worked, as new partners’ reporting has been good or excellent.
2	We recommend that Law Centres Network monitor partners’ performance with regards to submitting claims and reacts swiftly to any delays to prevent a backlog of claims in the future.	Although we tied reporting to regular payments, not all partners were incentivised by this - some were too stretched to do it on time. We monitored reports regularly but in spite of calls and emails some still sent their reports at the end of the project. Some partners required considerable investment in support. They did not understand how to complete budgets, timesheets or send other forms of evidence, and even when I had explained, they had to communicate it to others, and reporting often suffered in those cases.
3	We recommend that project partners continue their efforts to reach out to communities in their local areas while monitoring whether there are any specific groups of participants who are less likely to access the service (i.e. people of a specific age, gender, nationality etc).	Partners reached more isolated groups in general, especially those isolated by language, socio-economic status or education.  A considerable number of participants were Roma, which is one example of how partners successfully engaged EU nationals in real need.

<sup>4</sup> <https://blogs.kent.ac.uk/eu-rights-clinic/files/2017/12/Letter-to-Brexit-Task-Force-12.12.17-Public.pdf>.

The evaluator for the second half of the project is satisfied from this account that the recommendations from the midway report were carried out.

### **Transnational dissemination**

Living Rights project findings and information were disseminated to EU audiences and shared widely with many organisations outside the UK, including:

- 🌐 'My Mobility Mentor' project partners in Romania and Bulgaria
- 🌐 European Civic Forum
- 🌐 Volonteuropé
- 🌐 European Citizens Action Service - ECAS
- 🌐 European Anti-Poverty Network - EAPN
- 🌐 Jean Lambert, MEP
- 🌐 European Commission Representation to the UK
- 🌐 International Organisation for Migration
- 🌐 IUC Torino
- 🌐 Journalist at Europe Street News.

Findings were also shared with the 'EU Rights Project' by the Economic and Research Council and the University of York, for onward dissemination to their transnational networks. Frequent use of social media increased access to the findings, although it is not possible to verify how many organisations across Europe and beyond learned about the project and its work through this means. New Europeans facilitated dissemination of the project within EU institutions and the European Parliament.

New Europeans will be instrumental in sharing the findings and learning as they are very well-connected through social media: their twitter account has 46,700 followers and Facebook has 30,952 likes.

Links with the EU-level information services SOLVIT and Your Europe will enable EU citizens to have access in future to the awareness-raising materials and guides created by Living Rights prior to their arrival in the UK. This will be further evidence of the project's short and longer term impact.

### **Unexpected elements**

A project of this size, geographical spread and reach into new communities is bound to encounter unexpected elements or outcomes.

The first unanticipated element was the need for information and advice on civil rights for EU citizens who had been living in the UK for longer than 3 years:

"We learned there is no equivalence between the length of time in the UK eg 15-20 years and knowing about basic statutory entitlements. We couldn't aim our work only at newcomers for this reason or we would have missed these others."



“Since many EU nationals find themselves only able to obtain casual, low-skilled, insecure and low-paid jobs in the UK due to language barriers and down-skilling, longer UK residence often does not translate into greater economic stability and social integration. Thus, information and support for individuals who have been in the UK for longer than five years is as useful as for those who are newer to the country. Even before the referendum, there was an unexpected demand for Living Rights activities from longer-established EU communities in the UK.”

This was dealt with by LCN requesting a variation to the project’s target beneficiary group, to include EU citizens who had lived in the UK for over three years.

A further unexpected element was the discovery by some partners of forms of discrimination against EU citizens that caused their migration, or affected them whilst in the UK and trying to find work:

“The issue of LGBT has not previously been to the fore – we think about it in Russia but not in Poland etc. We had previously done asylum claims for Roma people on sexuality. If they leave the UK, they will go back to difficulties as LGBT people. We think of people moving here for work - not because they were gay in a tiny village. It is an issue.”

“We met different EU citizens groups eg disabled and LGBT Europeans. Disabled EU people have been here a long time and are a less mobile workforce – so evidencing job seeking is difficult for them.”

Action on the second issue will be taken forward by individual Law Centres drawing on their expertise in Human Rights law either within their number or from barristers experienced in taking Human Rights cases. It will also be included in LCN’s new partnership project funded by Barings Foundation to further extend knowledge and legal practice of countering discrimination using the Human Rights Based Approach. One Law Centre said:

“We will keep an eye on disability and LGBT issues and may support others to help them. We will look out for issues of discrimination – disabled and LGBT EU citizens and Roma people are the most obvious, and retained rights discrimination will affect women adversely.”










**Recommendation 1:** LCN is recommended to seek funding specifically to address these issues of discrimination, once Law Centres and other Living Rights partners have been trained to identify and deal with them from using the human rights based approach.

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## The Living Rights conferences

LCN organised two conferences as part of the project. Held in March and October 2017, they were extremely popular and oversubscribed, resulting in bigger venues being chosen to accommodate the 70+ people who wanted to attend. As well as a representative from each partner in the project, a range of others were either invited as high profile expert speakers or chose to attend to show their support and interest.

These included:

-  International Organisation for Migration
-  the European Commission representative to the UK
-  Red Cross
-  EU Rights Clinic/ECAS.
-  voluntary organisations offering support services for people facing homelessness, domestic abuse, LGBT issues, trafficking and labour exploitation
-  staff from Local Authorities
-  barristers and solicitors
-  universities
-  grass-roots groups of various EU nationalities.

Subjects addressed and discussed at the 2017 conference included:

-  Brexit, equality and human rights - covering seven distinct groups of vulnerable people and their support needs.
-  The relevant legal work that can be done to protect EU nationals' rights
-  Lessons learned from the Living Rights project.
-  How to involve policy-makers at national and local (Council) levels in working together to achieve change.

71 of the 87 delegates completed the evaluation survey at the end of the conferences. Responses showed that the overwhelming majority 'agreed strongly' or 'agreed' with the following statements:

| Compared to how I felt before the conference ...                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------|
| I now have a greater understanding of the Living Rights project.                                                                     |
| I now appreciate more about the impact the whole project has had in terms of advising and supporting a diverse range of EU migrants. |
| I benefitted professionally from hearing about the experience and learning of other providers and partners within this project.      |
| I understand more about the legal work that can be done to protect EU nationals' rights.                                             |
| I have made useful contacts at this event.                                                                                           |
| I have learned about other organisations relevant to my work through this event.                                                     |
| Overall, I consider that the event has been useful to me.                                                                            |
| Overall, I consider that the event has been interesting.                                                                             |

The comprehensive questions on the feedback form also asked what delegates would do, or do differently, as a result of the conference. Their responses fell broadly into four categories:

### Adapt and learn from good practice:

"We plan to give better information via dissemination to clients through different methods/outlets."

"We will make more of an effort to seek out and work in partnerships with other organisations in the field."

"We will adapt some good practices/approaches from several partners."

"We plan to strengthen community links."

"We plan to utilise ideas of how to find people in local communities who need help."

"I will be requesting a training session on EEA people's rights to benefits."

### Improve awareness locally:

"I have realised how my organisation has given no thought to the issues of Brexit and what might happen. I intend to raise this with my employer and see how we can help to ensure that people have the necessary information/preparation for rights of residence."

"I will invite a few speakers to my events and forums to raise awareness."

"We plan on working with the Local Authority, there are issues with them in terms of their understanding about migrants."

### Advocacy and policy work:

"We plan to produce blog posts and other pieces of communications to highlight future crisis points for vulnerable EEA nationals just before Brexit negotiations are concluded."

"We plan advocacy at EU level and the European Parliament on Zambrano carers."

"We will work to raise the profile of people with derivative EEA rights to be included in Brexit negotiations."

### Collaboration with project partners:

"We will contact and attempt to work in partnership with several of the organisations present."

"It would be useful to follow up on contacts made at the event and to continue working with them to assist our client groups."

"We plan to continue work in partnership, to challenge maladministration and promote rights based advice for EEA in the homelessness sector."

Before going on to examine the challenges, this final section under the heading of Main Achievements summarises the numerical outputs and results compared to the targets with regard to numbers of beneficiaries (see Table on the next page).

## Numerical summary of achievements compared to targets

| Type and number of persons benefiting from the project, and outcomes for them.                                                                                                                                                 | Target | Actual                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------------------------------------------|
| EU citizens who arrived in the UK within the past 3 years.<br>Note: changed to include citizens in the UK for longer.                                                                                                          | 1,098  | 1,300 evidenced but many more              |
| EU citizens as ‘Community Champions’ for project.                                                                                                                                                                              | 9      | 33                                         |
| EU citizens assisted with resolution of day to day barriers.                                                                                                                                                                   | 2,220  | 1,993                                      |
| EU citizens provided with practical information to participate in civic activities such as voting.                                                                                                                             | 2,000  | 2,000 known and many more accessing online |
| Printed copies of a Guide on How to Vote in UK distributed at project events to EU citizens.                                                                                                                                   | 2,000  | 2,000                                      |
| Public officials from responsible authorities and 3rd sector agencies receiving copies of workshop materials.                                                                                                                  | 604    | 770                                        |
| Participants at regional civic participation events with an improved understanding of UK civic processes and who can engage more effectively with local politicians.                                                           | 235    | 312                                        |
| Practitioners networking at 2 events (not the conferences).                                                                                                                                                                    | 100    | 110                                        |
| Frontline and EU level policy practitioners who receive up-to-date data on systemic barriers EU mobility in the UK to better understand how national and local policies help or hinder the participation of EU Citizens in UK. | 50     | 86 (not including conference delegates).   |

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## Challenges

This section explores the challenges faced and overcome by the Living Rights partners. Some were challenges affecting beneficiaries (eg difficulty in establishing their legal rights, negative attitudes to migrants post-Brexit), others directly affected the partners (levels of administration, a couple of minor ethical issues) and several affected providers and beneficiaries alike (lack of other funding to meet new demands for advice, language barriers, cultural differences). Except the challenges arising from Brexit, all the others were overcome one way or another by the partners.

## Brexit



At the start of the project, neither the EU commissioners nor the grant-holders could have predicted the events of mid 2016 - namely the referendum in the UK and its result. Living Rights partners and beneficiaries immediately noticed changes in attitudes to EU citizens, ranging from increased hate crime and verbal abuse, to public officials stating there was no point in housing homeless EU citizens as they would soon be leaving the country.

As early as five days after the result of the referendum was declared on 24<sup>th</sup> June 2016, one partner informed LCN:

“What is immediately obvious is the increase in hate talk and hate crime – sometimes maybe just the perception of it is sharper or people want to finally do something, who knows. It would, therefore, be useful to provide some guidance on reporting it.”

Another partner reported various disturbing hate incidents which happened in Ipswich in the weeks immediately following 24<sup>th</sup> June.

LCN responded quickly to support the partners and the project's beneficiaries by writing:

-  a factsheet on Brexit implications and advice
-  a factsheet on reporting hate crime.

Both are available here: <http://www.lawcentres.org.uk/lcn-s-work/living-rights-project>

In July 2016, New Europeans developed a short guide on EU nationals' status in the light of Brexit - to reassure EU citizens, remind them of their rights, counter myths and prepare them for UK's exit from the EU:

"In this regard we would like to do some work in that area, including developing a version of our Guide On Brexit - as you know it does not have the legal detail that you are dealing in but gives simple advice and sign posting - we would like to use some of our Living Rights budget to do some of this."

The demand for legal advice on immigration and right to reside rose dramatically, and completely overshadowed any interest in employment rights or other areas of entitlements. Fears about right to remain, be employed or retain tenancies were soon quelled by partners' speedy delivery of sessions and one-to-one support to EU citizens which were mobilised throughout the summer of 2016:

"We delivered three advice sessions on housing, employment and immigration. These sessions were timely as most of the questions asked by Migrants were about their rights to work and remain in the UK given the outcome of the EU referendum. At these sessions they reported experiences of hate and harassment."

"Before Brexit, we could go out and deliver workshops on health, public services, housing etc. Now immigration has taken over and everyone needs one-to-ones."

"The EU nationals I spoke to were all very worried post Brexit and, following these events, a number have scheduled one-to-one sessions. We are also planning outreach sessions at various universities and communities in other Scottish towns and cities."

"I think we will be doing a lot of our rights workshops on settlement - hopefully getting some set up fairly soon."

Two further effects arising from Brexit were reported by the Living Rights Project Officer in her monitoring report later in 2016:

"Since the announcement of the EU referendum result in mid 2016, the project's focus changed slightly to accommodate a new array of issues which then emerged for the migrant communities. The Brexit debate also impacted on the attitudes of communities to sharing their personal data - ie an increased reluctance to do so."

"Some groups of EU nationals who had been in the UK for longer than 5 years, such as the Polish and Portuguese communities, became newly fearful about the effects of Brexit and the attendant increases in hate crime."

At the time of the evaluation interviews (October 2017) the knock-on effects of Brexit were still keeping Living Rights partners busy, as they reflected in the following quotations:

“Brexit has changed the reach and impact and tone and slant of the project. The outcome is that people expect more from us and answer their specific issues. Most want to know if they will get to stay here. A lot would want to if it wasn't for Brexit.”

“We are funded by the Home Office for Hate Crime work and are set up as a third party reporting centre. This has been even more useful since Brexit.”

“Apart from raising awareness of their European rights, we have also promoted local citizenship initiatives. We have encouraged migrants to voice their views at a Brexit debate we are hosting next month. We have advised clients of the importance of retaining critical documentation to evidence economic activity, and continuous presence in the UK.”

“Much of our work is now focused on Brexit: getting Europeans' voices heard, making the case with local, national and European politicians that EU citizens need first and foremost, a unilateral guarantee of the continued rights, also support and advice. We are writing accessible material to provide information to EU citizens and seeking support for a low-level advice and guidance service across the UK simply on the issue of post Brexit options.”

“We have been clear that current rights are still in place and that we will share any firm proposals from negotiations at meetings and sessions as well as forums we attend. We support clients if they wish to make permanent residence (PR) applications and advise on what documentation and evidence they require – but also try and inform them that PR may not be necessary if new legislation is introduced. Reassurance has been primarily needed as people have been extremely concerned about the situation with Brexit.”

## Language barriers

The considerable challenge of language barriers was overcome in many inventive ways, as well as through traditional interpretation paid for through the Living Rights budget and the diverse language skills of Community Champions, as the examples below illustrate:

“I made sure that there were interpreters (that we paid for) at awareness events and on one to one sessions. At times we had to request that the EU national was accompanied by someone who could interpret for them – we also used Language Line if we called the DWP, HMRC or a local authority and an interpreter was needed.”

“Doing sessions in ESOL classes was good as the tutors could tell us whether people had understood or not. I'm used to delivering in basic language and taking out the technical bits, but the tutors could ask them a question and I'd realise that people hadn't understood me.”

“We had peer interpretation, with lots of checking that they understood the concepts too. Also interpreters for Roma, Romanian, Slovak and Polish – useful, but it was long.”

“Fortunately we have multi-lingual volunteers and a Romanian community centre nearby – so they did interpreting for free. We have a small budget, but asked people to bring their own interpreter if it was just a quick question so we could prioritise substantial cases. We made it work by begging and borrowing.”

“The project's budget for translation and interpretation enabled our immigration solicitors to reach individuals who did not speak English very well and who, as a consequence, tended to have restricted access to mainstream services.”

It was not just language that was a barrier to overcome, but also the nature of the concepts being explained, the ability of participants with little education to take it all in, and cultural differences which meant the concept of certain rights and entitlements was not always understood:

“It wasn't language that was the problem – for the Roma people from Bulgaria and Romania, it was just the quantity of things to take in. They couldn't cope with much information in one session, they wouldn't remember very much afterwards. It was better to do one-to-ones with them.”

“People from Romania couldn't grasp basic concepts like grievances and cautions because they had only ever been self-employed back home.”

“Some concepts are inherently difficult in any language eg the new state pension, and no translation is possible. We tried to explain difficult concepts so our language was lawyerly at times but we used layman's language where possible. You have to have the original difficult text because its meant to be exact, and if you stray, you can misinform people if you only refer to the easy-read version.”

Those quotes focused on interpretation of the spoken word and concepts, but translation of the written word was also key to the project's success in sharing information widely. Factsheets were translated into seven EU languages including Bulgarian, Polish and Romanian:

“The downloadable fact sheets on the LCN website in different languages were useful. I used some of them as handouts at awareness raising sessions, and attendees were pleased that leaflets were available in different languages. Also the post Brexit factsheets were very useful.”

### **Difficulties in establishing employment and housing rights**

For many EU citizens, knowing their rights and being able to exercise or establish them often proved to be different matters. This was sometimes beyond the powers of the partners to help resolve - often due to the corruption and exploitation built into some employers' or landlords' businesses, as explained by three Law Centre partners:

“It is difficult – people can’t speak to their manager as the manager may be part of the fraud that’s going on. People are afraid to raise issues as they will lose their job. Or they were told they would get bad references if they took a grievance against their employer, or they were put onto zero hour contracts suddenly. We referred some people to ACAS but they came back saying the advice and information was too general.”

“There are issues for people in the Roma community working for someone and paying NI and tax to them, but what is shown on the payslip is different ie the tax isn’t being paid by the employer. However, they won’t let the Law Centre write to their employer even though there have been successful prosecutions in this city. It happens more than they say.”

“People do have some understanding of their rights and try to assert them – but get refused. Many live in HMOs [Houses in Multiple Occupation] with overcrowding – but if tenants try to assert their rights, they face retaliatory eviction. Proving their right to be here is hard because landlords don’t understand the difference between one person and the next.”

When individuals fear the consequences of allowing Law Centres to enforce their rights under law, then the problem is bigger than can be solved locally. The policy strand of this project was designed to pick up such issues and take them forward to UK government and EU forums.

### **Non-licensed providers of immigration ‘advice’**

Partners discovered that ‘bogus’ immigration agencies were misleading EU nationals applying for UK residence documents. Furthermore, following the announcement of the EU referendum outcome, more uncertified immigration ‘advisers’ sprang up in European communities, making a profit out of individuals’ desperation to formalise their status in the UK. By law, immigration advisers in the UK must be registered with the Office of the Immigration Services Commissioner (OISC) or be a member of an approved professional body, but these individuals were giving immigration advice without that. Living Rights Project partners used only qualified advisors for their immigration outreach sessions, and observed high professional standards.

“Some things that purported to be small community organisations were actually profit-making and not out to help people voluntarily.”

“There are lots of people online offering advice or help to fill in forms, but they are not registered or qualified – and they charge a lot. Then people find their Home Office applications are turned down so they lose their money and their chance.”

### **Well-meaning peer advice**

In addition to the unscrupulous and exploitative providers of misleading advice, partners also discovered that well-meaning people in some EU migrant communities were trying to help and advise each other - but only based on out-of-date knowledge of UK immigration processes and regulations. Because of the widespread fear of the ‘authorities’, a category into which many Eastern European migrants placed solicitors, people preferred to seek advice within their own communities.



Outreach by the Living Rights partners and their Community Champions was therefore crucial to prevent serious legal problems arising for those who were being deliberately misled for financial gain or ill-advised by well-meaning peers:

“There are gaps across Derbyshire and Nottinghamshire where there are no community liaison workers. It has become evident that the migrants trust their peers more rather than access free advice service. This can expose individuals to accessing bad advice and being at risk of exploitation. This has been a barrier that we are trying to break down to encourage them to access the project and our advice/information services.”

“People in communities are still advising each other based on the old rules of more than two years ago.”

### **Increase in demand for follow-up work in complex cases**

Even before the issue of Brexit caused a massive increase in demand for complex immigration advice, partners found that the project produced the need for follow-up work in many areas of law to be carried out after brief advice had been imparted one-to-one at the community-based drop-ins. This was not funded by the Living Rights budget, so partner Law Centres varied as to whether they could meet this need for longer term case-work or not, depending on other funding and capacity.

Several examples follow:

“The drop-ins provided a good pathway for us to provide much more than just one-off advice about migrants’ rights. The main challenge for us was the flipside of the same coin. Due to the increase in numbers of clients we were able to see at the drop-ins, we saw a significant increase in demand for follow-up casework - resulting on huge pressure on us to answer this demand.”

“They often turned out to be very complex issues and this resulted in our not seeing as many as were in the target figures, although we still have time to do this. So many agencies are ceasing to take on complex and difficult cases and this has meant that the people we do see take longer than intended.”

“One shortcoming of the project was it was all one-off one-to-one short pieces of advice, whereas almost all could have been complex. Some were, and had to be helped. We didn’t have the capacity to refer in to our Law Centre as our capacity to do complex benefits advice is shot by the cuts.”

“The project should have funded more one-to-ones instead of group sessions. It didn’t allow for legal advice, but after people had our information on how to access things, they then needed legal advice if things went wrong.”

### **Lack of funding/resources to meet current and future needs for legal advice**

As is already clear from the preceding paragraphs, to meet the newly-presented level of need for one-to-one legal advice on immigration and employment issues in particular that presented during the project, all partners would have needed an instant injection of other funding. Although much creativity was exercised and good will offered by previous employees returning to give legal advice pro bono or on low fixed day rates, demand outstripped the resources available. The demand is envisaged to continue long into the

future, especially now that the partners have become ‘household names’ for EU citizens and relationships of trust built with their communities.

“We now can't meet the demand – the drop-in is full of EU migrants especially post-Brexit. Immigration is the biggest part, along with access to healthcare and the minefield of eligibility for welfare benefits.”

“We've raised our profile and opened the door now so we can't close it. Those who are able to pay for services can do so, otherwise it's pro bono or wait for LCN to get more funding.”

“A similar or extended project is arguably more necessary now than when the initial funding was awarded, due to the planned departure of the UK from the EU and the uncertainty and very real anxiety which our clients have reported experiencing.”

As a result of this project highlighting vast areas of unmet need for legal advice, it is even more apparent that funding for advice work is inadequate, particularly in the field of employment advice to deal with the widespread exploitation of migrant workers at a time when grant funding for this area of law has virtually dried up in the UK and Legal Aid only applies in cases of discrimination. A non Law Centre partner explained:

“The Living Rights Project was perfect for the needs of our clients. General advice is very important and has been very appreciated by our client group. Funds for such projects, whilst necessary, cannot be found elsewhere. At present, funders we spoke to said that migrants were not a priority for this type of activities. Black and minority ethnic (BME) individuals have been taken off among priority groups although they used to feature in the past. The only similar category they have left is women who experience language barriers. But what about men?”

**Recommendation 2:** LCN is recommended to lobby national and local government and grant-making trusts to make funds available to tackle the legal problems faced by EU citizens living in the UK that Legal Aid cannot pay for, especially in employment cases.

### **Administrative and bureaucratic challenges**

Almost all partners interviewed by the evaluator stated that their biggest challenge had been coping with the level of administration, recording of details and time-reporting involved with this EU-funded project. As most had not received EU funding before, they were unprepared for this, despite prior briefings from LCN. The levels of bureaucracy involved meant that a simple request to change money within the budget from one heading to another took some months to be dealt with by the funder, which prevented flexibility on the ground to respond quickly to local conditions or emerging needs.

These small to medium sized charities traditionally focused most of their resources on the front line rather than the back office, so found their levels of administrative support were insufficient. Most partners said that the budget within this grant did not allow for the amount of administrative time needed to process all the EU requirements. The comments below indicate the range of difficulties experienced:

"The EU should reduce the admin obligations otherwise they are effectively using their money to pay for admin. We didn't have an administrator but did need one – we as solicitors did it all ourselves."

"Recognise the huge levels of bureaucracy in reporting and excessive restrictions on small changes to the budget."

"EU funding is only a contribution to your work – it does not pay for everything and has distinct categories of expenditure which you have to adhere to."

"The only problem was admin but you have to accept it and get on with it."

"We'd never done an EU project before. We could be very critical about the lack of responsiveness from the EU people. In the budget, you can't vary things eg between room hire and paying staff. All our other funders eg Comic Relief, Lottery etc are much more flexible so we deliver more. With the EU, you end up not being innovative or seeking opportunities. It reduces delivery. We needed a whole administrator for the photocopying! It's irritating as it's been a really good project."

LCN's Project Officer for Living Rights reported on partners' difficulties with administration and explained how LCN mitigated these as much as possible through extra support and training:

"Most partner organisations have reported that the time and resources allowed for project administration were not sufficient and that they have had to allocate significantly more time into running the project than they can claim for. Most partner organisations are new to European funding requirements and this may explain their under-estimation of time required for project administration.

To make sure that the project is compliant and managed in line with the EU funding requirements, LCN organised a training course at the start of the project as well as visited partners individually, providing partners with the necessary tools to manage their projects and capture expenditure. It is expected that after submitting the first claims and progress reports, project partners will have built their capacity to work with these tools and will be able to spend less time on administration."

### **Challenges for LCN in project management**

Despite a lot of support from LCN both initially and throughout, a couple of partners did not complete sufficient monitoring. Had it not been for other partners exceeding their targets (and reporting reliably each quarter), this could have seriously affected the project's ability to evidence that it had met or exceeded its targets. There is no doubt that the work went on but, as it was not evidenced through monitoring returns, it counts for nothing towards the targets. There was a limit to how far the Project Officer could help these partners: they were provided with the tools, given a helping hand and clearly instructed about the monitoring requirements. Even making payments conditional on reporting did not motivate them.

More than a few partners did not prioritise the tasks of reporting and so left a lot of the administration until the very end of the project - only to realise that it was a large task still to complete for the final reporting deadline. The Project Officer scrutinised budgets and encouraged partners to increase the share for admin and reporting functions. Some admin staff did not read the guidelines provided by LCN, resulting in a lot of phone calls

and emails to and fro to provide guidance. As it was often the project managers who attended the training on reporting, those who were responsible for doing the reporting in practice were not fully up to speed and had little understanding of how and what to report. The lack of the full body of data soon after the end of the project also impacted upon the evaluation, which was continually updated in the light of new data being received by LCN from partners and passed piecemeal to the evaluator. The fact that the EU reporting deadlines were met was largely due to very long hours being worked by the Project Officer to pursue missing information and collate it for the final report and this evaluation report.

**Recommendation 3:** LCN is recommended to anticipate and overcome difficulties with partners through:

1. Project design: LCN to work more closely with partners during project design to ensure they better understand how the stringent admin & monitoring requirements will impact on staff time, and the importance of this in terms of project delivery, to be alongside delivering activities.
2. Project implementation: LCN to produce a monitoring manual with example templates which partners can use to guide them through some of the more tricky monitoring requirements e.g. staff cost calculators.
3. Project management: LCN to arrange meetings with each partner after the first monitoring report is sent to address any issues and queries inaccuracies at an early stage of the project.

## Cultural challenges

Partners learned much about the cultural differences within the EU, many of which posed challenges that were difficult to overcome. As highlighted earlier in this report, the Community Champions (CCs) played an invaluable role in explaining the cultural differences and helping to overcome reticence and fear within the newer migrant communities. Interviews with partners and CCs produced a long list of cultural challenges, which can be broadly categorised under the headings of fear, embedded beliefs, possible corruption and closed communities.

### Fear:

“Some participants refused to sign the attendance register saying that they are not happy to share their details despite that fact that they participated in the workshop. We believe that EU nationals feel very insecure and fear potential targeting by the police, immigration enforcement and other similar services. It is particularly pronounced among low-level skills migrants who experience difficulties and destitution.”

“Most attendees had never met a lawyer before. There is a real fear of public officials and discrimination in Romania, but our CC encouraged attendance and got people to come.”

“Crossing cultural barriers was a challenge, especially with the Romanian community as they perceive government as an enemy and would think our Law Centre was collecting information on them.”

### Embedded beliefs from experience elsewhere:

"Employment rights are difficult in Eastern Europe and there is a lot of cynicism about it amongst Romanians here. They don't consider the rule of law exists because at home, they don't benefit from it because the authorities won't do anything to help. Although it is the law, implementation is lacking. We tell them their rights but they are still apathetic. Informing people is easy compared to overcoming attitudes that are 20-40 years embedded. It's hard to convince them they can benefit from being a member of our society. Their reactions were cold and unbelieving at the start, then some got more tepid. Some eventually discussed their cases in one-to-ones and we referred them to CAB, a law firm or ACAS."

"In some Eastern European cultures, the idea of volunteering isn't known. There was a lot of mistrust of volunteer Community Champions because people were convinced they must be secretly being paid to pass on information to officialdom about them. In their experience, only family members and friends do nice things for no money – so they didn't believe CCs were trustworthy."

### Possible corruption:

"In some Roma churches, the pastors were telling their congregations not to go to Law Centres or listen to solicitors there. This is no doubt because a lot of pastors are either in with exploitative employers or turn a blind eye and passively support them."

### Closed communities:

"We have always tried to make links with Black and Minority Ethnic groups through doing immigration advice over the years, but it was so difficult to get a way in. From previous work, we know they can be very private and don't follow up or engage after we've done a talk, for example to the Chinese community. It's hard for individuals to overcome the barriers to going outside their community for advice."

"The Lithuanians were not so interested in what we had to offer. Their group works very closely with their Embassy and uses its premises for their activities, so they felt strongly that the Embassy should provide support and information. It's a small community so they can easily manage. This doesn't happen with Bulgarian, Polish or Romanian communities as they are too big."

Despite these barriers and cultural challenges, many hundreds of EU citizens managed to engage with Living Rights and gain support and advice from the partners over the last two years. Once their experience spreads further by word of mouth and through the evidence of good outcomes, more individuals will break through those barriers and seek advice from the partners long after this specific project has finished. The challenge will be to attract more funding to make it possible for partners to continue meeting the often-complex legal advice needs of these diverse communities.

## Ethical issues

A number of different ethical issues arose, none very serious or that couldn't be handled within the project - including:

"People overstaying and asking for help – all the time. Domestic violence – clients won't report it and won't let us do so."

"We had a young client – a worker in a Romanian car washing job who had no evidence of lawful employment so we couldn't help him take a claim. He said he would get some P60s faked so he could state his case. Of course we told him we could not and would not help him on that basis, but we did tell him what he could do himself."

"Some bodies called themselves organisations within tiny communities and on several occasions asked to come to our sessions – but they didn't deliver their slots. They had a hidden agenda – saying they would help us with promotion in the community, but actually wanting and expecting to be paid. Some had recruitment agencies attached, so we couldn't have them at our sessions because these were not business opportunities."

"An EU migrant couple came in about domestic abuse, so we separated them and only dealt with the woman, got her into a refuge – ie we decided the woman would be our client. The man complained and said we had made it up about the abuse. In that kind of ethical dilemma, you go with the client who is most vulnerable."

A different kind of ethical issue arose from the use of the attendance sheet templates provided by the EU commissioners, which asked for attendees' names and length of stay in the UK. It is understandable that this is useful information for monitoring purposes and to discover where the greatest needs/interest in the project came from - but other more anonymous means of finding out about length of stay could have been used by the facilitators at the events.

The Living Rights Project Officer stated in a quarterly monitoring report for the EU commissioners:

"Attendance sheets for events for EU citizens ask for information about the length of stay in the UK and some beneficiaries worry that giving this information in the current political climate may jeopardise their right to stay in the UK in the future. This applies especially to people who have been here for less than a year. In practice, there is no such risk and partner organisations do their best to explain this to beneficiaries.

The East European Resource Centre, which assists particularly vulnerable EU citizens, have said that some attendees are reluctant to complete the attendance sheet and thus their reported numbers are lower than the actual attendance. It might be useful to remove this information from attendance sheets and any other documents that are not anonymised to prevent beneficiaries being discouraged from completing forms."

### Minor difficulties and frustrations within the partnership

Although there were many good experiences reported of working in partnership with different kinds of agencies, there were occasional frustrations reported, concerning:

- ✂ turnover of staff - where partners were not informed about the replacement or where one partner dropped out and was replaced by a new organisation
- ✂ lack of direct phone numbers being supplied to ease communication
- ✂ some agencies being so busy that partnership working was not always prioritised.

This last example was provided by the partner that organised the Town Hall meetings:

"In general, excellent collaboration and very helpful management meetings. However the Law Centres often failed to alert us to opportunities to do Civic Rights sessions at their Awareness Raising. Given the geographical spread this was costly so we needed good notice to get cheap travel. We were not sure they afforded the same importance to our work as theirs, or perhaps they were just extremely busy. The difficulty is if we fail to complete our sessions, it could impact performance and our final claim - this worried us."

Partners' few negative comments were always balanced by positive ones, as shown below:

"The meetings could get hijacked by some people talking too long about their organisations and being self-focused – but they were generally empowering."

"It may have been useful to have more meetings than we did and maybe in a different part of the country other than London – we are holding a conference in Birmingham in October where useful outcomes and experiences will be shared."

All who mentioned such frustrations went on to tell the evaluator that overall, the quality of partnership working had been very high and colleagues in other agencies had been a pleasure to work with.

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This report now considers the short and longer term impact for the Living Rights beneficiaries.

## Short term impact

When asked by the evaluator what had changed in their local area for EU citizens as a result of this project, many examples were given - from which a few are quoted below:

"They have become more aware of their rights and organisations working with EU nationals are more informed and knowledgeable due to workshops for professionals."

"Persuading people about their rights was difficult but those who came said they knew more and were more confident about what they can do. We can only hope they will pursue remedies eg if they are injured at work."

"I hope they are now aware of the complications of actually meeting the requirements for lawful residence – which doesn't happen just by being here. We have put people on the right track so they know how to establish their residence rights. People are now aware of the different ways to show lawful residence in the UK."

"Migrants in our service delivery areas were experiencing similar problems particularly in areas of employment and welfare benefits. We believe that we have made a significant difference to a majority of the clients whom we advised, by empowering them to understand their rights and how to enforce them. We believe our engagement with clients has helped to build their sense of belonging and equality. Furthermore, we believe that such knowledge can be quickly transmitted through migrant communities as clients share their new understanding and successful outcomes. Although this process takes time, we believe that word of mouth sharing of such knowledge can be powerful, particularly in workplaces where migrants work together and often experience the same abuse of their rights."

"The legal information has helped newer communities to settle better with greater understanding of legal rights and responsibilities. We have had feedback that there is better understanding of rights eg to health services and how to deal with penalty notices for failure to pay for bridge tolls etc. This enables the migrant to undertake early action which prevents a larger impact if just left."

"The individuals we have helped are in a stronger position to deal with the consequences of Brexit knowing how to apply for settlement, what documents are required etc. We know anecdotally from Community Champions and others that this knowledge has been cascaded out, countering some of the misinformation around."

"Our legal advice services with EU migrant communities have enabled clients to take early proactive steps to improve their situations, like getting payslips, regularising employment, applying for settlement, paying fines owed quickly etc."

"We have received feedback that the newer migrants have settled and integrated more successfully, reducing problems with interaction with local government, education, health, employers etc."



Many examples of work to counteract the negative impact of Brexit have already been quoted earlier in this report, but this final one neatly sums up the overall short term effect that Living Rights has had for many EU communities in the UK at this tumultuous time:

"It has helped calm people down. People had been spreading messages on social media that all Eastern Europeans will be blocked from coming here soon. People stopped going abroad in case they could not get back in. Employers told people they would now be paid only half as they would not be legal in two years time. People were moved to zero hour contracts. Tenancy agreements were not renewed. Parents were told their children would not have a place in school. At least now many people know more about what is true and false."

## Longer term impact

A month after the end of the Living Rights project is too soon to be able to predict any longer term impact, which will mostly come through the project's input to policy-making and/or legislation. The potential influence on policy-making was outlined in this report under Achievements.

Dialogue and collaboration with policy makers and practitioners will not stop at the end of the Living Rights project. At the time of writing this report (January 2018), LCN continues to meet and work to influence policy with key local, regional and national government. LCN contributed to London Assembly Committee's letter to the Mayor on how he can best protect EU nationals in London. LCN is currently in dialogue with the Greater London Authority and other stakeholders including Brent Borough Council. Brent has expressed interest in learning from the Living Rights project and its policy recommendations as they seek to assist the integration of the large European communities in their area.

In December 2017, LCN used its experience and learning from the Living Rights project to contribute to joint letters to the European Commission and Parliament:

### **Law Centres have joined scores of other organisations and individuals in calling on Michel Barnier and Guy Verhofstadt to clarify the status of groups of EU nationals in the UK, following the first round Brexit deal agreed last week.**

The scope of the deal, as presented in [the Joint Report](#) of the EU and the UK government, raises concerns that it might not comprehensively protect the rights of all EU citizens currently living in the UK.

We have therefore sought assurances about provisions for some citizen groups, including family members and primary carers of children or dependent adults.

We have also asked for clarifications on a number of issues, including 'lawful residence', work and income thresholds, the requirement for Comprehensive Sickness Insurance and security-related restrictions.

The letters were addressed to [Michel Barnier](#), the European Commission's chief Brexit negotiator and his deputy Sabine Weyand, and to [Guy Verhofstadt MEP](#), chair of the European Parliament's Brexit Steering Group and other group members.

Other endorsers include NGOs such as the European Citizen Action Service ([ECAS](#)) and European homelessness federation [FEANTSA](#); legal practitioners such as barrister [Colin Yeo](#) of Garden Court Chambers; and a host of UK and EU legal scholars.

The Law Centres Network endorsed the letter, together with Central England Law Centre and North East Law Centre, who were partners in the Living Rights project. The barrister, Colin Yeo of Garden Court Chambers, presented at the final conference for Living Rights project in October 2017. The letters are available to read on the LCN website:




[Read the joint letter to the European Commission here.](#)  
[Read the joint letter to the European Parliament here.](#)

## Sustainability

The most obvious means of sustaining the work of a successful project is to obtain further funding to continue, replicate elsewhere or scale it up, but other methods also contribute to sustainability - eg the legacies of material and human resources, on which this section touches.

### Funding applied for

By December 2017, LCN had already applied for several grants to replicate, continue or scale up the Living Rights project and build on its success - including to:

-  The REC Programme 2017 (on the reserve list)
-  Trust for London (successful)
-  The Legal Education Foundation (application did not go through).

Funding has already been secured from the European Commission to encourage the integration and participation of Latin Americans in London who have EU nationality.

A related project led by LCN and involving Law Centres, advice agencies and other voluntary sector groups will take place in 2018 using funding granted by the Barings Foundation. This will skill up non legal practitioners to identify and refer cases of discrimination and other potential breaches of human rights, and legal practitioners in Law Centres will receive expert training from barristers on how to deal with such cases. The ground laid in the Living Rights project will be an ideal foundation on which to build this new approach, with cases likely to be presented by EU citizens as well as the many other vulnerable people facing discrimination.

With or without renewed funding, most partners could see ways to continue elements of the project and build on its success:

“We will continue to deliver our normal advice and specialist advice services to EU migrants, but the end of this funding will substantially reduce our capacity at outreach services, and we will not be able to deliver awareness raising events with the same regularity or frequency. Our community champion plans to continue to support the Romanian community in Luton through creation of a dedicated support charity to mirror the kind of support we deliver, albeit on a smaller scale. We will be very happy to continue to mentor and support her new organisation with training.”

“It is a worry for us that migrants are no longer a main part of funders’ priorities and, despite several attempts to find funding to extend our increased activity, we have not been able to secure the position of our project officer at this time.”

“Through the Law Centre and the other staff employed here – also advising them to attend other community organisations in the city – fostering links with the universities so that students can assist.”

“We have one project in London and are seeking funding to develop simple advice work in other locations.”

“We would like to keep our CC role. I've got a small grant from the Community Foundation for two CC volunteers to do Level 1 OISC so we can carry on doing free half hours on immigration, and pay someone to do the supervision.”

“Where resources allow, we will incorporate it into normal advice activity, but all of the awareness raising will cease.”

“We've raised our profile and opened the door now so we can't close it. Those who are able to pay for services can do so, otherwise it's pro bono or wait for LCN to get more funding. If necessary, we will use some Council funding given to us for families and immigration for EU migrants. The Housing Dept gets a lot of revenue from EU citizens so they might be interested in collaborating. We're talking to two universities – they need to plan and not bury their heads.”

Two specific concerns about obtaining funding locally were expressed as well:

“We won't be able to continue with events for Councils because they don't prioritise migrants.”

“The ending of this project means that some of this work is being suspended as there is no alternative funding around.”

## Material resources

The Living Rights guides feature on the AdviceNow website under ‘Top Picks’ - a “quality controlled selection of all the best legal information from a wide range of providers, handpicked from the best websites by AdviceNow”. AdviceNow is part of Law for Life, a charity dedicated to ensuring that people have the knowledge, confidence and skills needed to deal with law-related issues: [www.advicenow.org.uk/tags/employees-rights](http://www.advicenow.org.uk/tags/employees-rights)

New Europeans have produced a new booklet on how to get engaged in the community and are working with the Law Centres on the issue of advice on immigration status. Three ‘survival guides’ are available on their website <https://neweuropeans.net/survival-guides>

1. How to succeed as a European citizen in modern Britain starting from Day One.
2. Ways that EU citizens can get involved in the communities they live in and make their voices heard, as well as for those who want to help others do so.
3. How the voting system works and how to can get involved politically as an EU citizen living in the UK.

Outside of this project, as added value, New Europeans also produced a post-Brexit guide for EU citizens living in the UK covering general information about citizenship and rights that will enable them to make choices about their future, pending a conclusion of the overall Brexit negotiations. It is also available on their website.

The Labour and Social Affairs Attaché of the Romanian Embassy in the UK and Ireland told LCN that she has downloaded the Living Rights guides in Romanian and circulated them with her colleagues at the Embassy. She said that not only she found them useful, but also appreciated the simple language use and the clear structure and headings.

Workshops for professionals gave rise to the following quotes, amongst many others:

“Really useful - the PowerPoint is a good resource to use during session times as well as training tool. It's a big subject and I will need to regularly refresh.”

“Brexit has shifted the tone of the debate - we are very pleased to have the LCN resources [Living Rights Guides] to use in an environment where people are keen to have accurate, reliable information on their rights in general.”

Lasting material resources for EU citizens and those advising them have been placed on LCN's website:

- 🔗 12 plain English EU rights guides
- 🔗 a selection of these guides in 7 European languages.

[www.lawcentres.org.uk/lcn-s-work/living-rights-project/your-rights-in-other-languages](http://www.lawcentres.org.uk/lcn-s-work/living-rights-project/your-rights-in-other-languages)

### Human resources

Many of the Community Champions plan to continue volunteering for the Living Rights partners. One partner recruited nine Champions, all of whom are happy to stay on and continue to liaise with their own communities. The time and goodwill of the volunteers is not dependent on funding, but the necessary supervision/support from their host organisations has to be paid for as it cannot be absorbed into the roles of solicitors or other staff indefinitely.

Having skilled up public officials, professionals and other NGOs about the rights/responsibilities of EU citizens, partners reported that this has definitely improved decision-making in many cases. Although more work can be done, the skills and new practices now embedded in the public sector should continue for years to come, as shown by the examples in the workshops for Professionals section earlier in this report.

### Replicability and scaling up

Because the work is rooted in communities and has the support of the voluntary and public sectors in local areas, it should be attractive to a variety of grant-funders and therefore be sustainable at a small scale or, if regional, national or European funding is obtained, it could easily be scaled up. A Living Rights partner summed up the replicability of this project:

“This successful project of resourcing legal advice organisations to provide basic legal rights/responsibilities awareness raising and bespoke early and locally focused information to new migrants to a different EU country is very replicable and would have the benefit of reducing integration problems, reducing potential for exploitation, increasing compliance with local laws and procedures, and encouraging civic participating in volunteering and interaction with public officials.”

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## What next?

Partners were full of ideas inspired by their work in Living Rights for new projects to benefit EU citizens in the UK. Work to tackle disability discrimination, LGBT issues and employment abuses were mentioned by several partners. In addition:

"If Law Centres had the resources, they should produce a report on the primary concerns they dealt with in their 'surgeries'. Folk unable to fully exercise rights, domestic violence, divorce and illness; exploitation of workers; the Borders Agency's heavy handed enforcement."

"If this project goes on to Phase 2, I would argue that employment abuses should be a focus of ongoing work. There's a lot of good evidence on the gig economy and very few employment advisers are left even as volunteers in CABx because there is no funding for it."

"If there is a follow-on, it must address trafficking and modern slavery."

"We would like to re-focus on supporting EU community-based organisations/groups that have sprung up eg Polish ex pats, Bulgarians, Russians, Czechs and Slovaks – giving their volunteers skills and knowledge to build confidence and resilience to understand the issues and deal with rights-based problems – to get those dealt with at first tier to let us have more space and time to do second tier legal advice and representation."

LCN is actively developing these and other ideas or pieces of work with a variety of partners, all of whom are keen to build on the success of Living Rights.

**Recommendation 5:** LCN is recommended to produce a summary report on the primary concerns brought to Living Rights partners by EU citizens (many of which are quoted in this report), so that partners can use it appropriately as an awareness-raising tool with their local Councils and MPs, and LCN can share it with relevant government and EU bodies.

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## Conclusion

Living Rights was a complex, many-stranded project, very ably led by the Law Centres Network. The evaluator has seen and heard sufficient evidence to confidently state that this project has more than achieved its outcomes.

One of the most impressive outcomes is that the project's partners have established and cemented relationships of trust in communities between groups of often nervous and vulnerable EU citizens and the sources of support, advice and legal representation which can help them understand and establish their rights as EU citizens in the UK. These relationships, and those set up or strengthened between local organisations, are likely to endure and form the basis of many joint projects in the future - thus further extending the benefits of Living Rights.

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## Summary table of recommendations

1	LCN is recommended to seek funding specifically to address these issues of discrimination, once Law Centres and other Living Rights partners have been trained to identify and deal with them from using the human rights based approach.
2	LCN is recommended to lobby national and local government and grant-making trusts to make funds available to tackle the legal problems faced by EU citizens that Legal Aid cannot pay for, especially in employment cases.
3	<p>LCN is recommended to anticipate and overcome difficulties with partners through:</p> <ol style="list-style-type: none"> <li>1. Project Design: LCN to work more closely with partners during project design to ensure they better understand how the stringent admin &amp; monitoring requirements will impact on staff time, and the importance of this in terms of project delivery, alongside delivering activities.</li> <li>2. Project Implementation: LCN to produce a monitoring manual with example templates which partners can use to guide them through some of the more tricky monitoring requirements e.g. staff cost calculators.</li> <li>3. Project Management: LCN to arrange meetings with each partner after the first monitoring report is sent to address any issues and queries inaccuracies at an early stage of the project.</li> </ol>
4	LCN is recommended to produce a summary report on the primary concerns brought to Living Rights partners by EU citizens (many of which are quoted in this report), so that partners can use it appropriately as an awareness-raising tool with their local Councils, MPs and LCN can share it with relevant government and EU bodies.

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Rachel Hankins  
 RZ Hankins Consultancy  
 January 2018

## Appendix



### Interview topics for the final evaluation of the EU funded Living Rights Project.

This evaluation will help you as partners to look back over the second half of the Living Rights project, identify the good aspects and the challenges that have (or possibly haven't) been overcome. I will carry out confidential phone conversations - no names will appear in my report so you can speak freely. I don't plan to cover all of these questions with everyone, but aim to get a sufficient grasp of the experiences across the partnership. I look forward to speaking to you soon.

Rachel Hankins, RZ Hankins Consultancy.

| Getting to know you and your work in this partnership project |                                                                                                                                                                                                                                                 |
|---------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a                                                             | What is your role in the delivery of the Living Rights project within your organisation?                                                                                                                                                        |
| b                                                             | Was this a new client group for your organisation?<br>If yes, what were the challenges in identifying and reaching them to deliver the service?                                                                                                 |
| c                                                             | What was your Community Champion's contribution to this work?                                                                                                                                                                                   |
| d                                                             | Has the project resulted in your organisation helping or advising more EU migrants one-to-one than you were doing before? In which areas of law?                                                                                                |
| e                                                             | How has your organisation benefited from developing relationships with community groups or other agencies during this project?                                                                                                                  |
| f                                                             | How did your organisation have to adapt to deliver its part of this project?<br>Overall, what were the main things you learned as an organisation?                                                                                              |
| g                                                             | What kind of collaboration was there across the partnership eg sharing of learning, reflection in project management meetings etc? How did this help you?                                                                                       |
| Town hall meetings                                            |                                                                                                                                                                                                                                                 |
| h                                                             | Was a town hall meeting delivered by New Europeans in your locality? Did your organisation attend and/or participate in it?                                                                                                                     |
| i                                                             | What was the overall benefit from these meetings for any of: migrants, local councillors, MPs, MEPs, community groups, trade unions, your organisation, the public?                                                                             |
| Workshops for professionals                                   |                                                                                                                                                                                                                                                 |
| j                                                             | What were the results or outcomes from these - for professionals and for migrants?                                                                                                                                                              |
| k                                                             | Have there been any subsequent benefits for migrants from professionals having more knowledge - that you know of or have heard about anecdotally?                                                                                               |
| One stop shop outreach                                        |                                                                                                                                                                                                                                                 |
| l                                                             | What were the main successes and challenges of providing one stop shop outreach?                                                                                                                                                                |
| m                                                             | What were the benefits to migrants from these sessions? How do you know?                                                                                                                                                                        |
| Awareness raising sessions                                    |                                                                                                                                                                                                                                                 |
| n                                                             | What were the main successes and challenges of providing these sessions?                                                                                                                                                                        |
| o                                                             | Have attendees or other migrants you've worked with gone on to use their new knowledge about their rights - eg to protect their rights with help from a Law Centre or another agency? What do you know about this - eg areas of law/rights etc? |

| Other factors |                                                                                                                     |
|---------------|---------------------------------------------------------------------------------------------------------------------|
| p             | How did you overcome any language issues?                                                                           |
| q             | Since June 2016, what have you done to counteract the Brexit factor's effect on local migrants?                     |
| r             | Were there any ethical issues in delivering this project? What kind? How did you deal with them?                    |
| The future    |                                                                                                                     |
| s             | What will you be focusing on for the last two months of this project?                                               |
| t             | How will you continue to work with your local migrant communities after this project ends?                          |
| u             | Would you like to be part of further dispersed partnership projects led by LCN in future?                           |
| v             | How could LCN support partners more/better in this kind of project in future?                                       |
| Summing up    |                                                                                                                     |
| w             | Overall, what has changed in your local area for migrants as a result of this project?                              |
| x             | What advice would you give to another organisation like yours that was planning to be part of an EU funded project? |
| y             | What has been the best thing to come out of the Living Rights project for your organisation?                        |
| z             | And is there anything else you'd like to add that's relevant to this final evaluation?                              |





This evaluation was carried out for LCN

by

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