

All immigration is local

Jonathan Thomas



FIRST PUBLISHED BY

The Social Market Foundation, January 2019
11 Tufton Street, London SW1P 3QB
Copyright © The Social Market Foundation, 2019
ISBN: 978-1-910683-53-8

The moral right of the author(s) has been asserted. All rights reserved. Without limiting the rights under copyright reserved above, no part of this publication may be reproduced, stored or introduced into a retrieval system, or transmitted, in any form or by any means (electronic, mechanical, photocopying, recording, or otherwise), without the prior written permission of both the copyright owner and the publisher of this book.

THE SOCIAL MARKET FOUNDATION

The SMF is an independent think-tank dedicated to fair markets, open public services and the formulation of public policy on the basis of facts and evidence. We work with members of all major political parties and those who have no party affiliation to bring about more sensible political debate and policies that deliver greater happiness and prosperity, fairly distributed.

The Foundation is a registered charity and a company limited by guarantee. It is independent of any political party or group and all our funding sources are made public. This paper was supported by Unbound Philanthropy, a private grant-making foundation that aims to improve the quality of political debate and policy around immigration in Britain and the US. The SMF retains editorial independence over all its outputs. Views expressed in this publication are those of the author alone.

CHAIR

Mary Ann Sieghart

DIRECTOR

James Kirkup

TRUSTEES

Baroness Grender MBE
Nicola Horlick
Tom Ebbutt
Rt Hon Nicky Morgan MP
Rt Hon Dame Margaret Hodge MP
Peter Readman
Melville Rodrigues
Trevor Phillips OBE
Professor Tim Bale

KINDLY SUPPORTED BY



ABOUT THE AUTHOR

Jonathan Thomas

Jonathan Thomas is the Migration Researcher at the SMF.

Before joining the SMF, Jonathan had a career as a practising lawyer. He holds a BA in Modern History from Oxford University and an Immigration Law LLM from Queen Mary, University of London.

CONTENTS

FOREWORD BY JAMES KIRKUP, SMF DIRECTOR	4
EXECUTIVE SUMMARY	5
CHAPTER 1: SMALL SCALE, BIG IMPACT	8
CHAPTER 2: THE CONTROLLING MIGRATION FUND: A SHORT HISTORY	9
What (the Fund says) it does	9
The Well-Aired Criticisms	9
CHAPTER 3: THE CONTROLLING MIGRATION FUND: THE PAUSES FOR THOUGHT	10
CHAPTER 4: POPULATION PRESSURES AND PUBLIC ATTITUDES	11
CHAPTER 5: THE CONTROLLING MIGRATION FUND AND THE EXCEPTIONALISM OF INTERNATIONAL MIGRANTS	13
What we like about the CMF	13
What we are not so keen on	13
Are international migrants exceptional?	14
Recommendations	17
CHAPTER 6: A DATA RESET	19
Better, Combined Data Required; but Understand its Drawbacks and Limits	19
Cultural Shift from Siloing to Sharing Data, to Unlock Benefit for All	21
Recommendations	22
CHAPTER 7: LISTENING TO THE LOCAL	23
Recommendations	24
CHAPTER 8: THE OTHER SIDE OF THE LEDGER	25
Recommendations	26
CHAPTER 9: THE BUSINESS APPROACH: TUNNEL VISION?	27
Recommendations	29
CHAPTER 10: EXPERIMENTATION VERSUS ASSUMPTION	31
ENDNOTES	33

FOREWORD BY JAMES KIRKUP, SMF DIRECTOR

The title of this report is a play on the argument, made popular by US congressman Tip O'Neill, that all politics is local. O'Neill's point was that anyone engaged in politics and public life should always remember that the electors on whom democracy rests experience the issues that politicians debate and decide on primarily through their everyday lives in their homes, workplaces, cities, towns and villages.

That point might strike some people as being so obvious that it barely needs to be made, but in Britain's migration debate, we think it is a perspective that has not been given enough consideration, especially by those who see the benefits of an open approach to immigration. The SMF is one of many organisations to consider the evidence here and conclude that such an approach brings significant economic and social benefits to Britain and its people.

Yet there remains a question about how to ensure that those benefits are fairly distributed -- and fully appreciated -- across the country and across the population. Too many arguments for an open immigration stance have put too much emphasis on exploring those benefits at the level of macroeconomics, perhaps through such concepts as fiscal policy and productivity. Yet such concepts are, by definition, aggregates remote from the local experience of the voters whose consent is always required for any migration policy. Bluntly, arguing the case for immigration by talking about GDP is not an effective way to respond to people who believe that immigration is having detrimental effects on their local services and communities.

That is the starting point for this report, which offers a range of recommendations to policymakers -- both national and local -- as well as business leaders who seek to build and sustain public consent for an open approach to immigration and thus to retain for Britain the benefits that immigration brings. Winning that consent has rarely been easy, and faces obvious challenges in the current political climate. But, as earlier SMF work has shown, the electorate is more subtle and nuanced in its views than the national political and media narrative often suggests. We remain convinced that voters are open to evidence-based policymaking on this issue, and this report serves to inform both policymakers and the public about the potential for new policies and approaches to deliver better outcomes by making the benefits of immigration less remote and more local.

All immigration is local because migrants, just like everyone else, live their lives at a local level. The benefits of their presence and especially their work should also be felt more at that local level. This report shows how that can be done and we hope that policymakers of all sorts will find it useful.

James Kirkup, SMF Director

The prevailing wisdom is that local pressures due to immigration could be better addressed by a larger and better publicised Controlling Migration Fund. Is this really the case, and what might the alternatives be?

EXECUTIVE SUMMARY

Tensions resulting from perceived impacts of immigration at the local level in the UK have had a profound effect on national politics over the last decade. The Migration Impact Fund, launched, closed, then reborn as the Controlling Migration Fund (CMF), has been a key strand of the official response. It now appears to have cross-party support. The Fund though has not made much of a splash, and its small size and lack of publicity in particular have been the subject of considerable criticism from all sides.

There are though a range of reasons why, tempting though it may sound, properly addressing the local impacts of immigration in the UK are not simply a matter of beefing up the CMF. Local impacts from immigration take many forms and cannot all realistically be addressed by the CMF. Evidence of what, when and where those impacts are occurring is, in any event, insufficiently clear. In addition, local concerns expressed in anti-immigration feeling may have multiple causes, relating to issues of local decline arising from de-industrialisation or austerity policies. And they may require responses, on housing or minimum wage enforcement, that go much broader than just immigration policy.

Most importantly though, account needs to be taken both of the existing mechanism through which the resource allocation system seeks to adjust local services to population pressures, and also the question of how having a separate fund, badged specifically as addressing the local impacts of immigration, affects the public's perception of immigration. Some proponents of a larger and louder CMF seem to assume the best strategies to address immigration pressures are automatically those that will best placate public attitudes. But that is not necessarily the case. Indeed there are reasons for thinking that in some circumstances a standalone, heavily publicised fund specifically aimed at international migrants' local impacts could have the opposite effect.

But this does not mean we should just accept the status quo. It is clear that there are real public concerns over immigration at the local level and that improvements to the funding formulae are needed not only to ensure that they are understandable, consistent and transparent, but also to ensure they take account, on a timely basis, of the most up to date feedback on the prime factors that can generate extra pressures.

Through the bid-based system the CMF can provide an important bridge between the central and the local, demonstrating the Government's responsiveness to public concern while allowing it to foster local responsibility and ideas and to access important evidence and intelligence at the local level. But the CMF suffers from being misnamed, misdescribed and misrepresented, with blurred messaging about what it realistically can, and cannot, do. Increasing its size, and publicity in such a situation could make matters much worse, not better.

And we should also ask whether the act of badging something as explicitly targeting pressures caused by immigration really does help to allay immigration fears? Or does it

instead risk confirming prejudices about immigration, by framing and feeding a media narrative that the impacts of international migrants are exceptional, rather than asking how much of immigrants' impact at the local level really comes from their being a special category – international migrants – rather than from their being part of a general category – population?

Even for the purposes of integration programs, there is an increasing realisation that community cohesion requires a focus on integrating all segments of society rather than solely considering integration as an immigration issue. The CMF should be rebadged to focus on the integration programs that in practice it majors on and as such should become part of an expanded Integrated Communities Fund, addressing the integration of all in the community, not just recently arrived international migrants.

Better local data is crucial. Official survey, administrative and commercial data all have a part to play. But all have gaps, limits and sources of bias. Acknowledging and understanding these strengths and weaknesses of the different datasets can though be a source of power, enabling us to better link them together to get a much better picture of the impact of immigration on both sides of the ledger. But there is also a significant cultural challenge, a need for a broader debate around the benefits of fostering preservation, sharing and access to data, instead of data hoarding, siloing and destruction, in order to support key analysis and decisions that are needed for the benefit of society.

No matter how much local data is improved though, local interaction and feedback will always be needed in tandem. Not just to reassure local communities that their concerns are being heard. But because it is important that feedback is received on how potential pressure points from immigration are in fact playing out in each area. The regional Strategic Migration Partnership structure funded by the Home Office may need significant further enhancement if it is to be up to this task, but it could be best placed to provide the bridge between the central and the local in this way.

We also advocate greater publicity of the financial contribution and receipts received from immigration for a number of reasons. Not only to seek to address perceptions around fairness and contribution to society. But also to ensure ONS's move to publish additional statistics on the impact of immigration is appropriately balanced, and the connections and trade-offs inherent in the management of immigration made clearer. It is important that ONS's planned revamp of the immigration statistics to focus more on statistics on immigration's impacts should, to the extent that they are available, include statistics on the financial contribution of immigrants and immigration as part of the officially issued statistics. This will also allow a more balanced, and joined up, framing of migration statistics more generally, including by the media.

Our observations on how the business community has interacted with the immigration debate in the UK are not positive. The perception has been that business has secured for itself the benefits of immigration without doing anything to share those benefits more broadly. Its lobbying approach over immigration policy has been largely perceived as narrowly self-interested and has not in fact best served business' self-interest. Indeed it has increasingly served to target anti-immigration ire at business itself. Yet there seems little evidence of business changing its approach. UK business should consider the

American example, where business has sought to present a more holistic case for more open immigration policies from the broader society perspective rather than just what is good for particular businesses or industry sectors.

Finally, we highlight a large caveat. Which is that the best strategies to address both local pressures of immigration and public concerns resulting from them are going to need to be tested, and discovered through trial and error. Not just in terms of substance, but also in terms of branding and presentation. And the best strategies may differ considerably across different localities. The most pressing need is therefore to be flexible and open minded, and to experiment on that basis. The current state of political flux should be no excuse for delay. The time to start is right now.

CHAPTER 1: SMALL SCALE, BIG IMPACT

The outcome of the EU referendum showed that attitudes to immigration at the local level could have a fundamental impact not just on immigration policy (now reflected in the Government's White Paper on the Future Immigration System¹), but on politics itself, at the national level. Differential impacts of immigration in different localities, creating division, indeed polarisation, between perceived 'winners' and 'losers', were a major contributor to the EU referendum result. The local impact of immigration has suddenly come under significant scrutiny. Both from the top down, the Migration Advisory Committee (MAC) approaching the local through a national lens², and from the bottom up, a whole raft of initiatives going out into the regions, seeking to understand views and opinions on immigration at the local level in the UK³.

With the apparent recent significant decrease in the salience of immigration⁴, it might be tempting to think local tensions over immigration are yesterday's problem? That would likely be a mistake. Immigration pressures on the UK are likely to rise over the coming years. An end to EU free movement in the UK might provide little more than a breathing space in which to better set the foundations for addressing the local challenges in the future.

And for politicians there is also a threat if they do not do this. For an end to free movement removes the smokescreen behind which many politicians have hidden on immigration. "Leaving the European Union ... allows us to end Free Movement ... giving us the full control we need to bring migration down to sustainable levels."⁵ Without free movement, there will be no more excuses that the local impacts are the results of things that are out of the control of British politicians: any immigration to the UK, and any impact it has, will "belong" to those responsible for immigration policy. If there is increased transparency and accountability in the immigration debate, politicians will find themselves under increased pressure to deliver on their promises at a local as well as national level.

CHAPTER 2: THE CONTROLLING MIGRATION FUND: A SHORT HISTORY

What (the Fund says) it does

On the face of it the Controlling Migration Fund (CMF) is specifically designed to meet the local challenges of immigration. Originally launched by the Labour Government in 2009 as the Migration Impacts Fund (MIF), the fund was then scrapped by the Coalition Government before being reinstated in a slightly different guise by the Conservative Government after the EU referendum.

The original premise of the fund was to help local communities manage the transitional impacts of migration on the provision of public services. Importantly it was funded by immigration itself, through a levy on non-EEA migrants' visas. Bids were submitted by Local Strategic Partnerships for grants for local projects that could "demonstrate that they are directly targeted at managing pressures on public services, to the benefit of the settled community where those pressures relate to the transitional impacts of migration"⁶. Examples of the types of projects eligible for funding were given as: the provision of ESOL Services, local authority enforcement activities against rogue landlords, campaigns to increase GP registration amongst migrants to avoid unnecessary use of emergency services, and the provision of support teachers.

When the fund was reborn as the CMF in November 2016, its total budget, at £140 million over four years, and "resident benefit" approach, matched the MIF. But its resources were now split: £100m "to help local authorities and their communities experiencing high and unexpected volumes of immigration to ease pressures on local services", administered by the MHCLG, and £40m "to direct enforcement action against people in the UK illegally in order to reduce the pressure on local areas"⁷, managed by the Home Office. And, unlike the MIF, the CMF is only open to local authorities, not the third sector.

The Well-Aired Criticisms

The apparent political consensus behind the fund seems to have done little to endear it to many. Some have focused on problems with how the fund is targeted and the project biases and timelag of its bid-based system. But the main criticisms have focused on the small size of the fund, combined with the lack of publicity around the projects it is being spent on⁸. Rather than the public experiencing "a tangible demonstration of government commitment to address the issue"⁹ and feeling the warm glow of an 'immigration dividend' compensating them for local immigration pressures¹⁰, the fund's public impact has been negligible. Unsurprisingly, suggestions to rectify this have focused on giving the fund significantly more resources and publicity¹¹. But there are significant pauses for thought.

CHAPTER 3: THE CONTROLLING MIGRATION FUND: THE PAUSES FOR THOUGHT

Firstly, local pressures on wages, housing, health, education take quite different forms, and require very different responses, between spending on services, on integration, on enforcement. Which, secondly, begs the question how best to identify those pressures and impacts in the first place. Listening to individual views of the public is important. But there is an obvious danger in resource allocation based on “how loudly the views are expressed”¹². And accurate population data, let alone objective evidence of impact; what, when and where to respond, is a challenge.

The MAC looked hard for data evidence of local immigration induced pressures, yet concluded that “migrants have no or little impact on the overall employment and unemployment outcomes of the UK-born workforce ... migration is not a major determinate of the wages of UK-born workers ... There is no evidence that migration has reduced the quality of healthcare ... we find no evidence that migration has reduced parental choice in schools or the educational attainment of UK-born children ... We also found no evidence that migration has reduced the average level of subjective well-being in the UK.” Right down to the LSOA level¹³.

A third complexity is that, even if expressed in anti-immigration feeling¹⁴, differential impacts and resulting concerns across local areas, not just over wages, housing, health and education, but impacting community cohesion itself¹⁵, may be primarily generated by factors other than immigration¹⁶. These include the impacts of longer term de-industrialisation, and recent austerity policies, local area decline feeding into how communities feel about themselves¹⁷.

Fourthly, different communities have shown themselves to be more resilient than others to some of these developments¹⁸, including the threats and opportunities of immigration¹⁹. There can be striking differences, therefore, even between different areas that have similar-sized populations and levels of migration²⁰.

Fifthly, just as conflated concerns are hard to pick apart, immigration policy alone is often insufficient to provide a remedy. So a lack of housing stock and planning restrictions affecting housing availability, weak minimum wage enforcement impacting wages, underperforming schools, all need a much broader response than just through immigration policy²¹.

The final two pauses for thought are though perhaps the most important of all. The first is the mechanism through which the resource allocation system seeks to adjust local services to population pressures. And the second is the question of how having a separate fund, badged specifically as addressing the local impacts of immigration, affects the public’s perception of immigrants and how immigration is being managed.

CHAPTER 4: POPULATION PRESSURES AND PUBLIC ATTITUDES

It seems uncontroversial to suggest that communities with a higher level of immigration should receive extra funding to compensate²². But in the rush to propose a bigger and louder migration specific fund, “none of the proposals appears to have examined the existing resource allocation mechanisms to explain why ... there is a real financial problem that should be addressed by a new funding stream”²³. For the budget for many public services, including schools, GPs and hospitals, is allocated locally by formulae largely based on ‘weighted capitation’, ie the funding adjusts to reflect additional population flows²⁴. Indeed in justifying scrapping the MIF in 2010 the Government pointed to the local resource allocation role of this core government spending as obviating the need for such a fund.²⁵

Six years later though, after the immigration issue had upended the UK political system, the Government obviously felt that although that might still be the technically correct answer (the paltry resources dedicated to the new CMF rather confirming this), something more was needed to be seen to be done to demonstrate how seriously the Government was taking immigration’s local impacts. Indeed the clear subtext behind the CMF, and suggestions for a more heavily resourced and publicised version of it, is that it can mollify, maybe even change, antagonistic public attitudes to immigration.

This assumes that immigration is a major contributor to unease and anger at the local level, rather than just an articulation of unease and anger at something else. But also that, even if it is, giving publicity to greater resources being devoted locally to addressing specific impacts and specifically badging this as related to immigration, will address this unease and anger.

Yet triangulating the evidence of local impacts of immigration, the local perception of those impacts, and local public attitudes towards immigration is not so simple. The best strategies to address immigration pressures on the one hand, and to address public attitudes on the other, are not necessarily aligned, so how should relieving pressures and addressing attitudes best be balanced and prioritised?

Nor are public attitudes monolithic. Take integration spending on English language support for immigrants. Those who give primacy to cultural concerns and immigrant assimilation²⁶ may be supportive of this. But those economically concerned that immigrants are taking their jobs or undercutting their wages may have the opposite reaction. On the flipside, if you take the view of some commentators that deep seated cultural factors are the best explanation for local level animosity towards immigration, rather than perceptions of its impact on local prosperity or public services, then directing financial resources to a wide range of projects at the local level to combat the latter is unlikely to have much impact on attitudes²⁷.

Indeed, in terms of public attitudes, could the impact of a standalone, heavily publicised fund specifically aimed at immigrants’ local impacts in fact be actively counterproductive? Some evidence from other policy areas suggests that compensatory spending at the local level may engender the opposite reaction²⁸. If those concerned about immigration see money being spent to counter the local service impacts of immigration in their area, might

this validate their perception that immigration has indeed been insufficiently uncontrolled and is causing costs and impact to services in their community? Might this risk undermining community cohesion rather than supporting it, indeed reinforcing a perception that international migrants are to blame for the shortcomings and decline of public services²⁹?

Another argument is that economic perceptions are actually important, even in the areas most concerned about immigration, but that in influencing local people's perceptions media narratives are no more trusted than 'expert statistics'. Rather it is local level narratives; personal experiences and anecdotes, from friends, family and acquaintances, that are most effective in forming and changing opinion.³⁰

Which all gives significant pause for thought when considering what impact a larger, more publicised, CMF, might have. Or indeed whether it might have any additional impact at all? Assumptions of how specific policy initiatives aimed at local immigration impacts may change public attitudes at the least seem sufficiently uncertain that it would seem ill-advised to found policy decisions on them.

So does this mean we should just do nothing, relying on existing core funding allocation mechanisms?

No. Firstly, technical approaches should not ignore the need to give sufficient comfort to the public. Second, publicity of 'immigration dividend' spending targeted at local pressures might have better public attitude outcomes than suggested above, particularly if framed differently³¹? Third, there are serious questions to be asked about whether the existing funding formulae really work so well? Are they understandable, consistent and transparent? Do they react in a timely enough fashion to sudden population changes? And are there not some aspects in which international migrants are in fact different in terms of their potential impacts: what about the challenges of their lower English language skills, their younger population potentially making greater use of maternity services, etc? And even if the resources allocation works perfectly, that may address the main service pressures, but what about other concerns such as integration and impact on wages/employment?

The MAC concluded that "it is unclear if the extra fiscal contribution of migrants is carried through into funding of public services." The MAC did all they could to try to understand the flow through of resources to the local level, but found the system "very complicated", disjointed between different services, and concluded that issues with the availability and timeliness of data meant that the resources did not always follow population increases at the local level on a timely basis.³²

So where does this all leave us?

CHAPTER 5: THE CONTROLLING MIGRATION FUND AND THE EXCEPTIONALISM OF INTERNATIONAL MIGRANTS

What we like about the CMF

The motivation behind the CMF is laudable; to demonstrate the Government's responsiveness to public concerns over immigration, and to provide reassurance that the local impacts are being responded to. And so is the acknowledgement, through the bid-based system, that the decisions on what is most needed should come from the local level, be connected to local communities, and that through this process the Government can access local evidence, experience, knowledge and intelligence to "gain a greater understanding of how migration affects communities, places and services"³³.

What works best in managing the local impacts of immigration should not be pre-judged. Research, innovation and experimentation is key, both in terms of the strategies that work best, but also the data that is most meaningful and useful in managing local perceptions and concerns, and also how to package and present actions, or to justify lack of action, in a way that may best address those perceptions and concerns.

There is also evidence that projects funded by the MIF/CMF have played an important role in helping local areas to better evaluate and understand migrants' experiences in their own region³⁴ and the different capabilities across their region to meet the challenges of immigration³⁵.

What we are not so keen on

Signaling priorities is all well and good, but what priorities is the CMF signaling? Blurred messaging flows through the official communications on the main 'local service impact' portion of the Fund. Is it about alleviating impact on local services and amenities or about assisting integration?

A recent Government press release on the Fund starts:

"Councils across England will receive a share of a further £19 million to help ease pressures on local services resulting from recent migration ... Local authorities have developed plans to ease local pressures on housing, education and health services arising from recent migration providing benefits to the whole community."³⁶

But the Press Release then goes on to detail nothing at all about easing pressures of these sorts. Perhaps that is because local authorities do not even control many of these key services³⁷.

The CMF's stated aim is "directed at achieving benefits for established resident communities"³⁸. But is that how it is perceived? Much of what the CMF focuses on is the alleviation of pressures on migrants themselves: action versus rogue landlords, helping refugees into work, supporting victims of modern slavery, assisting migrants with their English language skills, supporting refugee families into permanent housing, care for unaccompanied asylum seeking children.³⁹ Is there not therefore a risk that when it comes to reassuring a concerned local population:

- creating a fund that implies that there is a causal connection between immigration and pressures on local services and amenities,
- but then not using the fund to address those pressures,
- but, rather, largely focusing the Fund on issues which could be perceived as mainly benefiting the newly arrived immigrants,

might be a counterproductive strategy, particularly for a fund whose name suggests that it is controlling migration? And might this look like saying one thing and doing another, further undermining trust and fuelling anger at the local level, rather than rebuilding it? Might this be why some local authorities are loathe to publicise their activities funded by the CMF? And why other authorities have decided not to tap the CMF at all?

This ties into how the CMF fits in to the overall mechanism for responding to population change at the local level. Taking the CMF name at face value, the public could be forgiven for believing that the CMF represents the sum total of what is being done to respond to the local impacts of migration. Whereas in reality the CMF represents just a slither of that response. But it is only if you read behind the headlines that the CMF's very supplemental nature becomes clear. Publicity for the CMF could arguably be best first directed in making this clear. That for the services that the public are most concerned about at the local level, health services and schools, there are mainstream funding mechanisms, designed to be responsive to population increases, which the CMF is not intended to duplicate⁴⁰.

The CMF has laudable aims. It funds important projects. It provides a crucial bridge between the central and the local. A focus on promoting integration helps communities not just to mitigate the costs, but also to maximise the benefits, of immigration⁴¹. The CMF has a real opportunity to leverage ideas at the local level to find out what works, what does not, and understand different capacities and capabilities. But by design the CMF is constrained as to which local impacts it can make a difference on. And we should not badge it, describe it so as to give the impression it is something it is not. Increasing its size, and publicity in such a situation could make matters much worse, not better.

And we should ask, does badging something as explicitly targeting pressures caused by immigration help to allay fears? Or does it instead risk confirming prejudices about immigration? Does it help cohesion or, rather, reinforce division? How might the reactions differ if it were branded differently, more in alignment with what it actually does target in practice: integration impact? community cohesion?

Are international migrants exceptional?

The CMF inherently badges the impact of international migrants as exceptional. The ONS is currently also proposing to head further down this path, moving away from focusing on immigration just in terms of population change towards an approach focusing more on immigrants' impact on services, consumption of benefits⁴². Like the CMF itself, this may be an understandable response to the perceived need to be seen to do something specific about immigration. But this framing of the exceptional impacts of immigration itself has impacts, further feeding a media narrative to this effect.

But how much of international migrants' impact really comes from the fact that they are international migrants, rather than just people? Unlike the CMF approach, the core

funding allocation mechanisms for health and education at the local level tend to view them as simply people, as extra population, not having exceptional impacts or requiring exceptional mitigating actions. Adopting this approach frames international migrants' impact in a much more neutral context; more people move to your neighbourhood, whether from Burnley or Bratislava, your services and amenities need to be resourced accordingly. But you do not need the CMF for that. And it would be counterproductive to pretend that you do.

There are a number of different angles to this. Firstly, even in an area such as language skills, while "some immigrants impose additional costs compared with ... some natives, that statement is not true of all immigrants. And some natives also impose additional costs in the same way". Nor is there evidence that immigrant children who speak English as an additional language (EAL) adversely impact the education of the native speakers alongside them. Secondly, more generally there are changes though "that could be made to the funding formulae that would make allocations work better for both immigrants and natives". Thirdly, some international migrants' behaviour can though impact how they (do not) get taken into account by the formulae, and therefore potentially distort resource planning in that way; an example would be if significant numbers of international migrants do not register with their local GP in advance of needing their services⁴³. And fourthly, some international migrants may be exceptional in other ways, for instance in terms of the employment, or housing, conditions they will bear, which can have impacts outside of service pressures.

Indeed, if the baseline for funding allocations is that immigrants are just people for the purposes of managing their impact on services at the local level, evidence should be proactively sought out to challenge this assumption, and that may show international migrants having a differential impact. Circumstances such as that in Corby, where the the 2003 'Catalyst Corby' plan meant that the population growth it saw as a whole was expected, but the international migrant portion of it was not, could make a useful case study to analyse further in this regard⁴⁴.

With regard to realistic potential for improvement, the MAC note that MHCLG funding formulae are currently under review, to modernise and simplify the local authority funding allocation process from 2020.⁴⁵ There are some migrant-related areas where such a review could profitably focus: a better marker for poor English than EAL, adjustments to maternity funding to reflect differential use of maternity services due to different fertility rates amongst different female populations.⁴⁶

These considerations also highlight some important ways in which international migrants' behaviour can impact the funding. Deprivation is factored into the schools' funding formulae based on the numbers claiming free school meals. So immigrants with no recourse to public funds or who fail to navigate the bureaucracy to successfully claim their entitlement may result in underfunded schools.⁴⁷

Another challenge is that "the ability of local authorities to plan and deliver services effectively is hampered by a high amount of churn."⁴⁸ Particularly in schools, where annual resourcing is based on the yearly school census and those moving intra-year will therefore not be taken into account in the resourcing. This is quite separate from the "class

disruption and difficulties in tracking the educational progress of children” who move schools intra-year. Another is that NHS funding formulae is based on the total population registered with GPs. But some evidence suggests that EEA work migrants in particular are less likely to register prior to becoming ill, meaning that if they do at that stage then make use of the system, the system may not be properly prepared for them.⁴⁹

A more proactive approach to resourcing might seem a better approach, but is it realistic? The APPG on Social Integration highlights the Canadian example, with local government supported to enact strategic infrastructural improvements and positive cultural diversity initiatives in advance of immigration.⁵⁰ But the UK is not Canada. The UK does not have the luxury of running an almost entirely pre-planned immigration regime, through official resettlement schemes, able to select which immigrants it takes, when and where. While the UK has recently increased its resettlement numbers, which allows it to attach funding, for instance for secondary education, to those who are resettled⁵¹, only a tiny proportion of the UK’s immigration is ever likely to come through such schemes.

It may seem less controversial to view international migrants as exceptional for the purposes of integration programs. But in terms of both impact and potential responses this is also less clearcut than might be imagined. A key report argues “new immigration has no significant impact on local neighbourhood cohesion [and] it would be wise for policymakers to focus on deprivation rather than migration in setting policy on cohesion and integration.”⁵² And in terms of solutions there has been a shift to a more holistic approach, a focus on integrating all segments of society rather than considering integration as just an immigration issue.⁵³ Increasingly the third sector is building this into its programming; for instance the Migrants Resource Centre makes half of its available workshops’ spaces – from computer courses to job search support to health clinics – available to native English speakers in the local population.

The recently established ‘Integrated Communities Innovation Fund’ (ICIF) seeks to support “strong integrated communities where people – whatever their background – live, work, learn and socialise together”⁵⁴. The ICIF “complements the CMF by inviting organisations across the country to come forward with innovative ideas to encourage integration”. But the first challenge identified by the ICIF is ‘Level and pace of migration’, and the ICIF Prospectus suggests that the two Funds should be taken together to “improve our understanding of the impacts of migration ... as well as what works to build integrated communities”⁵⁵.

Another of the ICIF’s stated key challenges is ‘Lack of English language proficiency’, which of course the CMF also majors on. The ICIF highlights the “English language support through a new Integrated Communities English Language (ICEL) programme and the next phase of the CMF [as the reason that the ICIF] will not fund [direct] ESOL provision [but] innovative proposals that involve English language support as a secondary outcome are eligible for funding.”⁵⁶ The ICEL⁵⁷ is targeted at longer standing parts of the migrant community, particularly Bangladeshi and Pakistani women, not in work, who have been in the UK over a year.

Are these multiple funding silos warranted? And might the learning from them be better adapted, and adopted if it flowed through a single resource aimed at integration and community cohesion. The APPG on Social Integration has proposed an Integration Impact Fund which would absorb the CMF, “in part to avoid the duplication of labour within government, but also to provide a less politically charged name for a funding stream which should exist, first and foremost, to strengthen communities.”⁵⁸

Recommendations:

- 1. For the purposes of the allocation of resources by local area, the starting point for policymakers and public bodies should be that immigrants are counted as ordinary people and not treated as a different category.**
- 2. The section of the Controlling Migration Fund that is overseen by MHCLG should, together with ICIF, ICELP and other integration programs become part of an expanded Integrated Communities Fund. This fund would aim to address the integration of all within the community, not only recently-arrived immigrants. This Fund should continue to allocate money on a bid basis, but the pool of eligible bidders should be expanded to include third-sector bodies.**
- 3. The local funding formulae across all relevant services should be expeditiously reviewed in the light of the criticisms of the MAC regarding transparency, understandability, consistency and responsiveness.**
- 4. This review should also specifically take into account evidence of the ways in which international migrants’ behaviour might currently be resulting in an under- or over-funding of some services or bodies. For example, do international migrants’ exhibit lower rates of GP registration ahead of actually seeking treatment, which may then result in under-funding of GP services.**
- 5. In the first instance, this funding review should consider options to change migrant behavior that affects resource allocation and services. For example, new publicity campaigns to encourage new arrivals to register with a GP.**
- 6. Where such behavioural interventions cannot be shown to be effective, funding formulae should be amended to direct more resources in line with the best estimate of the consequences of migrants’ behavior. For example, if international migrants’ exhibit lower rates of GP registration ahead of actually seeking treatment, then funding formulae for GP services in those areas should be adjusted to reflect this and assess other ways to best proxy immigrants’ likely use of these services.**
- 7. Enhanced Strategic Migration Partnerships (or any other vehicle that can best deliver the required expert local review and feedback) should be provided with information to be able to understand and assess the working of the local funding allocation formulae. This must be sufficient for them to be able to compare the outcomes with their own evidence and experiences from the local level. They should be able to formally question and challenge those outcomes as part of an annual review process.**

8. **The ONS' move to highlight the impacts of international migrants should be presented in a balanced context, acknowledging also the impact at the local level of internal migrants' movements. In line with treating migrants as ordinary people, the ONS should, where possible, report the movements of non-UK nationals at the same time as reporting movements in the domestic population.**

CHAPTER 6: A DATA RESET

Better, Combined Data Required; but Understand its Drawbacks and Limits

Localities are themselves calling for better, more timely, local data⁵⁹. The APPG on Social Integration has suggested a government commission “to investigate how data collection opportunities and population projections could be utilized more effectively.”⁶⁰ If we are going to spend money on the impact of immigration most effectively, we must look for the objective data that can provide the quickest and most reliable trigger for whether to spend and, if so, on what, when and where.

A registration regime for migrants⁶¹ or ID cards for all⁶², if in place, could in the future bring significant data benefits. As things currently stand, however, there are three key sources of data. Each has its benefits, but also its drawbacks and limits.

1. Official Survey Data

Surveys are key for measuring changes over time, particularly in attitudes and outcomes. “Some of the integration outcomes of interest to the government can realistically only be measured via survey data collection”⁶³. But in the UK the decennial time lag between censuses, the questionmark over the continued political commitment to traditional surveys⁶⁴, concerns about declining response rates and self-selection bias in the characteristics of those who do respond⁶⁵, are leading to consideration of other data types.

Not least because the UK has recently experienced significant migration flows in a short space of time. A majority of Romanians and Bulgarians living here arrived after 2011, the last Census. Thus local Census demographic information on migrant numbers and characteristics can quickly become outdated. And shrouded in guesswork. Between Census years, ONS’s estimates of non-UK born local authority populations, based on the Annual Population Survey, can have large confidence intervals. The YE June 2018 estimate for Hastings of 12,000 came with a confidence interval of $\pm 7,000$; in Boston, the 21,000 estimate came with a confidence interval of $\pm 10,000$. Further demographic information about immigrants is not available for most local authorities between Census years because of sample size constraints.

Some of these limitations could be addressed by developing administrative data for statistical use.

2. Official Administrative Data

The ONS aim to “begin to put administrative data at the core of evidence on migration in 2019”⁶⁶ requires leveraging the Digital Economy Act to allow data to be shared between different government departments. The potential for understanding migration patterns and integration outcomes through administrative datasets comes from the “sample size, which enables breakdowns to smaller levels of geography”.

Unlocking the data is the first hurdle. “In principle, HMRC and DWP data could be developed to provide regular statistics at the local level on non-UK nationals’ employment, self-employment earnings and benefits receipt, including by year of arrival.

Administrative data on other non-working groups may be available from NHS records.” This could provide “an understanding of the local-area population of particular subgroups such as refugees, family migrants, or people who initially arrived as students ... [and also] provide data on mobility patterns of migrants and other residents within and between local authorities”, which is regularly requested by those planning local responses but not currently available.⁶⁷

It is welcome that the Government has at least acknowledged that “we will consider how best to facilitate the sharing of relevant data held by the Government on the operation of immigration policies and wider economic data, which will help to inform the MAC’s deliberations”⁶⁸. But the greatest potential lies in being able to link key data – such as HMRC and DWP data with Home Office immigration status data – and then share the result. And to share more broadly than just with the MAC, but also with other interested parties and researchers who can carry out their own analysis on the data in the interests of society better managing the challenges of immigration at the local level.

As for what is currently available, some have argued a migration fund “should be quasi-automatic ... based on timely data on the scale of migration (using, for example, National Insurance numbers and GP registrations).”⁶⁹ There has been an increasing use of both overseas national NINOs and GP registrations as a proxy for migration flows at the local level⁷⁰. But both also have drawbacks, the GP registrations as described in the previous section, and the NINOs as they represent the first registration for working (not all) migrants in an area, and do not necessarily reflect exactly where the migrant is actually working.

The focus on flows in is understandable. But, as much migration is transient, knowing if/when people move on is very important for understanding local pressures⁷¹. And here the data is largely lacking. Disclosed overseas national NINO information does not provide any information about onward movement, nor even which NINOs are still active in an area. Similarly GP registrations will only reflect onward movement if a new registration is made. And there are some things that official administrative data will never tell you. Which is where commercial data could be useful.

3. Commercial Data

Given the increasing share of information that is now collected by commercial organisations through a myriad of interactions with individuals, in the UK the ESRC Consumer Data Research Centre, among others, has invested significant time and intellectual effort building a consumer data research infrastructure with the potential to make a meaningful contribution to understanding population movements.⁷² Some local authorities are beginning to look in this direction to meet their data needs⁷³.

Indeed, given its focus on individuals’ activity and interactions, commercial data could have important applications for longer term analysis, to better understand integration progress, as well as documenting more fundamental changes in neighbourhood ethnic composition, and population churn⁷⁴, but also for immediate “nowcasting, or prediction of the present”. Commercial data also has the ability to drill down into local areas where other forms of data collection such as surveys can be hampered by very small sample sizes⁷⁵.

But commercial data is not a panacea for all data ills. And indeed has significant challenges of its own. Unlike surveys, carefully constructed based on the basis of scientific sampling, or administrative data, designed to ensure full coverage of the population of interest, consumer data is simply the ‘exhaust’ of commercial transactions, an uncontrolled by-product laden with inherent bias⁷⁶. But in understanding and accepting this, this data may then actually be less prone to inadvertent misuse than survey data, which is assumed to be representative but where declining response rates and self-selection bias amongst those responding can make it significantly less so.

4. Bringing it All Together

It is by acknowledging and understanding the gaps, the limits and the sources and operation of bias in different types of datasets, that we can become more confident in harnessing their power. Indeed by comparing different types of data, particularly where one is known to be biased, we can begin to better understand systematic patterns in the bias that can then be leveraged to improve the usefulness of both types of data⁷⁷. Our mixed data economy provides a significant opportunity if we can enhance access to, and link up and combine different data sources, “to triangulate rich, salient and timely consumer data with more conventional census, administrative data and social survey sources”⁷⁸. But therein lies a big cultural challenge.

Cultural Shift from Siloing to Sharing Data, to Unlock Benefit for All

A significant shift in mindset is required: in government, in business, in society. Which intersects with fundamental questions as to who should own and control data. If the data debate is purely framed as one of data ownership, competitive advantage and commercial exploitation versus consumer protection, it ignores the claim on behalf of the broader public good to the benefits of the data being accessible and usable as a valuable resource for guiding society’s decision making and allocation of resources.

Of course, ethical and legal considerations of disclosure control, anonymisation and privacy must be addressed⁷⁹. But a moderated data commons, where sufficiently anonymised data can be accessed and analysed for the purposes of better managing migration at the local level, should be possible without damaging the interests of business or consumers. The Facebook ‘Adverts Manager’ platform is an example of a mine of data, in effect a continually updated census, that is already so accessible⁸⁰.

But that is not generally where we currently are. Those looking to expand the available data for the benefit of society have thus far been largely dependent on the goodwill and ‘data philanthropy’ of those organisations willing to share data. While there are research carve-outs in both the General Data Protection Regulation (GDPR) and the Digital Economy Act, many consumer-facing organisations are now so sensitised to the risks of inadvertent data misuse and disclosure that it is data destruction that is prioritised. Data past a certain age is automatically deleted, akin to “burning any book with last year’s date”⁸¹.

The Government should therefore lead a broader debate around use of data for the common good, to make the case in support of a cultural shift to fostering preservation, sharing and access to data, instead of data hoarding, siloing and destruction, in order to support key analysis and decisions for the benefit of society. The Government should also

lead by example. Instead even the MAC, despite being specifically commissioned by the Home Office, were not given access to all existing official data they wanted access to in order to seek to understand the impacts of immigration.

The role of business here should also be explored. The Government should consider the ways in which the sort of “big data” held by companies such as Facebook might be used to help generate a more accurate picture of local population levels, composition and movements. Access to Facebook Adverts Manager is one thing, but much of the key data is still only available inside Facebook even if, on occasion, results of analysis based on this are disseminated publicly.⁸²

In an ideal world, companies that are publicly committed to better corporate citizenship and the public good would actively seek to support public bodies in developing better policy here. But potential incentives to co-operation should be explored, including via the tax system. Policy-makers could also consider the use of their public platforms to encourage holders of big data to demonstrate their commitment to the public good by sharing that data on a secure, anonymised and aggregated basis.

Recommendations:

- 9. The Government should recognize the importance of survey data in seeking to track local issues around immigration over time. In particular the Government should commit to continue, but also enhance, questions in key surveys that can better measure integration outcomes particularly through ascertaining immigrants’ own experience of more subjective key integration aspects, including their assessment of their language proficiency, their use of their qualifications and evaluation of quality of work, and the educational outcomes of any children.**
- 10. The Cabinet Office should lead a review of how the Digital Economy Act can be used to share official administrative data on immigrants’ impact, not just on services but also on wages and housing, between different government departments and public bodies.**
- 11. Administrative data on the impacts of migration should be made more easily available for independent researchers to bring about a better-informed and evidence-based public debate on the issue.**
- 12. The review should also consider how commercial data could be used to deliver better and more responsive policies around migration and its impact. Companies holding large volumes of aggregated data (for example, Facebook) should be encouraged to securely share anonymized data on local populations and movements. Incentives for co-operation could include tax breaks or other financial incentives for companies.**

CHAPTER 7: LISTENING TO THE LOCAL

Better data at the local level could make localities not only feel empowered, but potentially also puncture the current fixation on national measures such as the net migration target. But a purely data driven approach could also be misrepresented as a further centralising project, leaving localities even more alienated. No matter how much local data is improved therefore, this should always be combined with local interaction and feedback. “Key to the success of a migration impacts fund is reassuring local communities that their concerns have been heard, and returning a sense of control”⁸³ which can “serve to disrupt the sense that population change is foisted on communities by a distant metropolitan elite”⁸⁴.

It is more than just a matter of managing perceptions though. Despite its drawbacks, it is important to remember that the MHCLG rationale for having a bid-based CMF is that the circumstances of places varies and local pressures cannot be easily predicted, but also because it helps to build contacts and understanding of what is happening at the local level. This is particularly important in terms of integration where “the interplay of demographics; patterns of migration, physical geography; industrial history and local economy in each place make for a unique set of challenges.”⁸⁵

But there is also a case for more feedback up from the local level on how migration pressures and interactions with public services are actually experienced, including, importantly, by the migrants themselves⁸⁶. But those at the forefront of service delivery may be reluctant, wary of any action that could be construed as their being used as an instrument of enforcement. And in any event this needs to be done very carefully to ensure that such information can be trusted, calibrated, compared and actioned across different regions in a way that does not risk exacerbating feelings of unfairness and inequalities between them.

Could an enhanced form of the existing regional Strategic Migration Partnerships, funded by the Home Office, potentially play the key control and co-ordinating role in this respect? While they may vary in their current level of resourcing, scale, ambition and coverage across regions, as well as currently tending to focus more on certain aspects of the immigration regime, their role could be enhanced and expanded. SMPs have the potential at least to bridge the divide between the central and the local in a way that is sufficiently rooted in their regions to give “a sense of control and accountability closer to home”⁸⁷.

This function will be challenging. It will require local authorities themselves to have more open discussions around the impacts they are experiencing and how to address these. Whoever performs it will ideally need to have an overview of all potential pressure points from migration in their area, so as to delineate and prioritise between them, and drive the quite different responses required.

Each locality will have its own mix. Corby is a good example. As the 2003 ‘Catalyst Corby’ plan meant that the ensuing population growth was not unexpected, even if the international migrant portion of that was not anticipated, perceived pressure on local services might be expected to be less a factor here than in other areas. And indeed the local feedback suggests quite different concerns. In particular whether the benefits of immigration being captured by local employers are being more widely shared, with the

international migrants' level of English, and whether or not the international migrants are net contributors in terms of tax paid versus benefits claimed.⁸⁸

This should remind us to be wary of a one size fits all approach and preconceptions about what are the main issues to be addressed in mitigating local concerns about immigration in any particular area. Only by drilling down can concerns be delineated and responses appropriately targeted. For instance, if housing is the problem is it the lack of housing, or rather the perceived anti-social problems of multiple occupancy housing tenants spilling out into the street? If the latter then action against 'rogue landlords' and landlord licensing schemes may be the best approach.

Recommendations:

- 13. The Strategic Migration Partnerships structure should be further enhanced and expanded as the forum best placed to have an understanding and overview of the local impacts and challenges of the different aspects of immigration policy. As such it could complement, but also potentially challenge, the data, in being able to gather and calibrate local evidence and feedback in particular on the local service, wage and housing impacts of immigration.**
- 14. This aspect of the SMPs' role should form part of an annual review in which the SMPs report to Parliament on their views of the local impacts of immigration, in particular in the context of their experience of the performance of the local funding formulae and other data used to seek to manage these.**
- 15. Local authorities should be specifically involved in the consideration of the development of new survey questions designed to capture local experiences of immigration, including integration outcomes, and also of those types of administrative and commercial data which might be most helpful for identifying and managing immigration impacts at the local level.**

CHAPTER 8: THE OTHER SIDE OF THE LEDGER

It may seem somewhat hypocritical to advocate for greater publicity of the financial contribution and receipts received from immigration when we have cautioned whether publicity of this sort has any impact and, if it does, whether that impact is necessarily in the direction intended. But we believe it is potentially important for four reasons.

Firstly, because the clear message from conversations across the UK on the local impacts of immigration has been that public acceptance of immigration policy is closely connected to perceptions of fairness and contribution to society⁸⁹.

Secondly, to balance ONS's move to publish statistics on the impact of immigration on public services and access to public welfare⁹⁰. ONS's quarterly statistics releases have become a staple of the media reporting on immigration, and ONS's revamping of its approach is likely to increase media reporting on these aspects of immigration's impact once ONS begins reporting on them for the first time. Having statistics on the financial receipts from immigration also presented will act as an important counterbalance, both to the new impact statistics being reported, but also to the headline net migration number.

But it is not just about seeking to provide a balanced backdrop to the media narrative. If coupled with these other statistics, statistics of immigrants' financial contribution should also make clearer the connections and trade-offs inherent in the management of immigration; so for instance data showing that net immigration had reduced would be presented alongside data showing that financial receipts from immigrants had also reduced.

Receipts from immigration can be divided into:

1. Direct fees paid by, or relating to, immigrants including:
 - a. Fees paid by immigrants to enter the country: visa and NHS surcharge
 - b. Fees paid by sponsoring employers: immigration skills charge
 - c. Fees paid by immigrants once here because of their status: including upfront NHS charge
 - d. Fees paid by immigrants once here to change their immigration status, apply for permanent residence, naturalisation, of themselves or child etc.
2. Direct taxes/NI paid by immigrants
3. Penalties, including fines paid by carriers, employers, landlords, in breach of immigration laws
4. Indirect contribution
 - a. Taxes paid by those employed by immigrants
 - b. Taxes raised on consumer spending by immigrants

Thirdly, like the initial funding mechanism of the MIF, it is important that the financial contribution of immigration is viewed as being available to meet the impacts of immigration at the local level.⁹¹ Currently this is not the case. Instead, much of it is earmarked for the core funding of the Borders, Immigration and Citizenship system⁹². But, if nothing else, it would not seem advisable to make the budget for the control of our borders dependent on how much money we raise from immigrants.

Fourthly is the importance of highlighting the indirect contribution of immigration. In the US this has been a major focus of the 'New American Economy' project. Not least because it is this indirect contribution which may actually be the most tangible to the public. At the level of each district of each state, the NAE website interactively presents statistics on the amount of immigrant spending power, number of immigrant entrepreneurs and number of people employed by immigrant owned businesses, all showing how the economic activities of immigrants interact with, and can benefit, locals⁹³.

Recommendations:

- 16. Statistics on the financial contribution of immigrants should form a core part of ONS's plans for immigration statistics to better address the impacts that immigrants have. They should be reported at the same time, on the same frequency, and alongside, statistics on the other impacts that ONS are reporting on. This will allow a more balanced, and joined up, framing of migration statistics more generally, including by the media.**
- 17. Currently lack of publicly available data, including from HMRC, precludes the presentation of data in the UK on the financial contributions of immigrants to local areas of the type provided by the New American Economy in the US. HMRC should make this data available to allow a fuller, more balanced presentation of the impacts of immigration.**
- 18. It is important that the financial contributions of immigration are seen to be available to be spent on the local impacts of immigration. The aim of making the central UK border and immigration control system self-funding from receipts should be scrapped.**

CHAPTER 9: THE BUSINESS APPROACH: TUNNEL VISION?

Business should ask itself some tough questions about its performance in allowing the immigration policy developments the UK has witnessed over the past decade. Against what should have been a benignly supportive pro-market political backdrop, most sectors of the business community have proven unable to positively influence a succession of immigration policy developments – from the decision to hold the EU referendum, the outcome of the EU referendum, the introduction of the Tier 2 cap, and of the net migration target, arguably all the way through to the MAC’s Final Report on EEA Migration and the Government’s large scale acceptance of this in its White Paper on the future immigration system – that have all come to threaten the more open immigration policy from which business in general has significantly benefited.

Rather than business using this sorry catalogue as a cue to rethink how it can best more broadly build public consent for the immigration regime that works best for it, if anything its tactics seem to have narrowed further, the debate on work immigration becoming ever increasingly sectorally focused, different business sectors arguing for their own cause and continued access to the EU labour supply they want. This may be understandable, but it can be perceived as business being self-serving, uninterested in training and employing local people. A clear hint of frustration that the business community’s assertions seemed so narrowly self-interested ran through the MAC’s Interim Report,⁹⁴.

Contrast this with the approach in the US, where business plays a core role in the Welcoming America⁹⁵ programs, and the ‘New American Economy’ organization. The latter, chaired by an alliance of business leaders, including Rupert Murdoch, and ‘metro mayors’, including Michael Bloomberg, is designed to make a much more holistic case for open immigration policies, presented not from the narrower perspective of what business wants, but from the perspective of what “helps grow the economy and creates jobs for all Americans”⁹⁶.

On one hand the approach of business in the UK might be viewed as simply a matter of poor tactics. Perhaps too timid to engage on important societal issues⁹⁷? Or perhaps CSR departments have been overly narrowly focused on refugees? Or multinationals have been uncoordinated in applying their more proactive US approach in the UK? But, for whatever reason, any reading of the conversations with the public across the country on immigration⁹⁸ suggest a more fundamental failing on the part of the business community; that in not being seen to have engaged at all at the local level on the impacts of the immigration that business is seen to have primarily benefited from, the business community has itself come to be regarded by much of the public at the local level as a significant driver of the immigration “problem”. Time and time again in the records of those conversations one hears animosity directed primarily not at immigrants, but at *business* -- at property developers, at landlords, who are viewed as having benefited from immigration at the expense not just of long term residents, but also, on occasions, of the immigrants themselves.

Two examples. First, minimum wage compliance. Based on ONS data, the UK Director of Labour Market Enforcement says that “it is estimated that 342,000 jobs were paid below the National Living Wage in 2017 ... [and] around a fifth of all low-paid jobs for those aged 25+ are paid below the NLW”⁹⁹. Despite this, or perhaps because of this, evidence

suggests that many employers in the UK are hardly living in fear of enforcement measures¹⁰⁰. Nor does this take into account the impact on wages of low-paid self-employment¹⁰¹.

Other countries take a different approach. “The problem and the concern around migration and free movement has been driven by the exploitation and undercutting that has been allowed to take place ... Free movement is not regarded with the same concern [in Sweden, Belgium and Germany] as it is here, because they have these proactive and positive measures around providing increased protection for workers’ rights”¹⁰². In Switzerland the wages and labour conditions inspection regime connects with companies accounting for 10% of employment every year, and, along with other initiatives such as joint liability for sub-contractors in the food industry and construction sectors, seems to have had a significant impact on addressing the public’s perception of worker immigration¹⁰³. The UK Director of Labour Market Enforcement has recommended a system of joint responsibility for the sub-contracting chain before deciding whether to go as far as to institute joint legal liability¹⁰⁴ of the type used in Switzerland. This seems sensible and business could actively signal its acceptance of this.

In the UK, most current enforcement activity remains dependent on tip-offs¹⁰⁵. Companies accounting for only 0.2% of employment receive an inspection every year¹⁰⁶. This plays into lower skilled local residents’ fear of undercutting and unemployment, as a result of immigrants being more willing to take jobs paid below the threshold. All played out against the backdrop that Government seems quietly supportive of business profiting from this. A ministerial statement explaining the UK’s reluctance to opt-in to the EU Employer Sanctions Directive cited an unwillingness to adopt the obligation on employers to pay for the work that undocumented migrants had already done if they had been paid under the national minimum wage¹⁰⁷.

Second, integration. As “the workplace is the main place where integration happens”¹⁰⁸, there is a feeling at local level that those who benefit from immigration should take some responsibility for integration¹⁰⁹. The Government itself has encouraged business to consider business’ “wider role in promoting integration to help build strong, integrated communities, promoting the English language skills of employees, and encouraging mixed environments”¹¹⁰, so it would not seem to be in business’ interest to ignore this. Or even worse, be seen to be acting against it, for instance by running ‘language shifts’ – the practice of having work teams segregated by linguistic group¹¹¹. The evidence from the National Conversation shows that little does more to upset local residents, and it is not clear that the immigrants themselves benefit. The impression given, compounded where the business is a large multinational that is not seen as rooted in the local community, is that the broader potential benefits of immigration and integration are sacrificed for short term business advantage at the expense of local wellbeing.

It is understandable that in fighting its corner in the Brexit debate, the business lobby should be focused on influencing upwards among policymakers and influencers. But it would be a grave error for business to ignore the animosity that often appears to be evident towards it from the wider local population. Even from the narrowest self-interested perspective, volunteering to give up a little could potentially save having to give up a whole lot more. And business needs to reflect on the broader perspective; that pressures in local communities across the country, including but not exclusively from

immigration, have left many ordinary people feeling diametrically at odds with business' interests. And, instead of simply accepting this, business could first acknowledge this poor state of affairs, and then proactively seek to address it.

Take the application (or not) of the immigration skills charge to EEA migrants post-Brexit. As a potential extra cost going forward, business has unsurprisingly set itself against this¹¹². But it might want to reflect that payments such as the ISC may also embed an opportunity. In effect it is a contribution which business are making as a result of immigration which could be better connected to those do not see themselves as having gained from immigration. A similar potential is inherent in the APPG on Social Integration's proposal that "an Integration Impact Fund could be paid for, in part, by a new Integration Levy on employers operating within those sectors of the economy which are particularly dependent on immigrant labour"¹¹³. If business is likely to face at least some of these costs, might it be better advised to engage a little more positively on this, perhaps focusing instead on realising potential public engagement and perception benefits at the local level from doing this, which could help it win the greater public consent it is currently lacking.

Recommendations:

- 19. Business should more proactively and publicly engage on integration matters at the local level. This should start in its own operations, by business publicly acknowledging the importance of the workplace in integration, and taking this into account when considering its business practices, such as 'language shifts'.**
- 20. Business should also consider the extent to which its interests could be best served, and better aligned with those of the local community, by going beyond the simple confines of its own operations. Companies that employ migrants should consider providing a space and time for language tuition at work, or sponsoring time spent by staff on integration initiatives in the local community. Policymakers should consider what financial incentives might be made available to firms doing so, perhaps in the form of tax relief on direct costs for such programmes¹¹⁴.**
- 21. The UK's poor record on minimum wage compliance should be addressed through a better resourced, more active and intrusive labour inspection regime. Consideration should be given to whether increased penalties, potentially linked to annual turnover or some other metric which makes the risk of these penalties less likely to be discounted, might be more impactful in achieving better outcomes.**
- 22. Business leaders and metro mayors in the UK should seek to emulate the 'New American Economy' approach championed by US business leaders including Michael Bloomberg and Rupert Murdoch. Leading UK businesses that benefit from immigration should seek to form alliances that can present the benefits of immigration in a less narrowly sectoral and self-interested, more user-friendly and holistic, manner.**
- 23. Business should be pushing for the collection and public release of official datasets of the type that are available in the US and used by the New American**

Economy data analysis, that can show both the direct and indirect benefits that immigrants bring to the resident population.

- 24. For its part business should consider what anonymised data it could make available which could be useful for the purposes of analysing and managing the impacts of immigration at the local level. We note that the members of the New American Economy “coalition” include Mark Zuckerberg of Facebook.¹¹⁵**

CHAPTER 10: EXPERIMENTATION VERSUS ASSUMPTION

There is one large caveat to all of this, which leads to perhaps the most important recommendation of all. Which is that the best strategies to address both local pressures of immigration, and public concerns resulting from them, are going to need to be tested, and discovered through trial and error. The most pressing need is therefore to experiment “in a spirit of humility rather than conviction”¹¹⁶.

What works best at the local level should not be pre-judged. We need to better understand why, and how, immigration impacts differently across different communities¹¹⁷. We need to pilot different approaches to find the strategies that work, and the data and local feedback that is most meaningful. This includes:

- How to best assess the different impacts on public attitudes of different strategies, and the different ways those strategies can be packaged and presented?
- To what extent does badging funds/programs/projects as specifically targeted at/addressing immigration reduce local concerns over immigration or increase them? Reduce division or increase it?
- What are the different consequences of quietly, scientifically trying to address an impact versus more publically doing so?
- If we choose publicity, how does the public reaction vary depending on whether we brand the response as immigration control, or integrated communities, or community cohesion, or a changing society, or population adjustment?
- How do we calibrate and prioritise resources between addressing services impacts versus integration versus enforcement?
- For integration projects, are these better received locally if seen to be targeted at international migrants, or if they are seen to be addressed and presented as accessible to the local population more broadly?
- When might highlighting an ‘immigration dividend’, or the proceeds of immigration, change perceptions, and when just entrench them?

The spirit of the ICIF may be closest to what we need: “experimentation in the design of new approaches ... test innovative approaches so we can build understanding of what works ... helping to improve our collective understanding ... To date, evidence about what works systematically to boost integration has been patchy, of variable quality and not easily accessible to the people who need it. To gather and disseminate evidence of what works, we are taking a number of steps. These include supporting five new Integration Areas ... to work with us to gather new and better evidence and share lessons widely ... We will be encouraging better knowledge exchange, so that any new evidence will be accessible and available to practitioners, policy makers and communities”¹¹⁸

Our approach will need to be adaptable to the new circumstances as the UK institutes a new immigration policy post-Brexit. Indeed we should interrogate the proposed approach in the light of the proposed policy developments¹¹⁹. But also the proposed approach can provide important perspectives from which to assess these developments.

So, for instance:

- Will the embracing of more temporary immigration routes, with restrictions on bringing dependents, mean less local pressure on services, but also an even harder to track short-term workforce that raises serious questions from an integration perspective?
- If EEA workers now become subject to visa fees and the ISC how much will immigration receipts rise further?
- If an end to free movement at the lower skilled end is in effect replaced by the combination of short term circular migration and a rise in irregular overstayers, how will the data deal with this?
- Might such a combination adversely affect the overall tax take, the ability to make accurate local funding allocations, and the perceptions of the public?
- Might commercial data come even more into the spotlight as the best way of trying to track the data footprint of irregulars who steer clear of official systems?

All of these questions and more remain to be answered. Most importantly though, uncertainties about the political and policy landscape should be no excuse for delay. There is much important work to be done here.

ENDNOTES

-
- ¹ HM Government, 'The UK's future skills-based immigration system' (December 2018) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/766465/The-UKs-future-skills-based-immigration-system-print-ready.pdf.
- ² Migration Advisory Committee, 'EEA migration in the UK: Final Report' (September 2018) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741926/Final_EEA_report.PDF.
- ³ Jill Rutter and Rosie Carter, 'National Conversation on Immigration: Final Report (British Future and Hope Not Hate, September 2018) <http://nationalconversation.uk/wp-content/uploads/2018/09/FINAL-2-national-conversation-september-report-2018-09-final.pdf>. Phoebe Griffith, 'The Integration Compact: A Strategy for Maximising the Benefits of immigration' (IPPR, August 2018) <https://www.ippr.org/files/2018-08/the-integration-compact-august18.pdf>. Heather Rolfe et al, 'Post-Brexit immigration Policy: Reconciling Public Perceptions with Economic Evidence' (NIESR and Birkbeck, 11 October 2018) <https://www.niesr.ac.uk/sites/default/files/publications/FINAL%20Leverhulme%20report%20FINAL.pdf>.
- ⁴ Ipsos MORI Issues Index, November 2018, has immigration at its lowest salience level since April 2002 <https://www.ipsos.com/ipsos-mori/en-uk/concern-about-brexit-continues-climb-and-worry-about-crime-rises-seven-year-high>.
- ⁵ Foreword by the Home Secretary to HM Government, White Paper on Future Immigration System (n 1).
- ⁶ Department for Communities and Local Government, 'Managing the Impacts of Migration: Improvements and Innovations' (March 2009) <https://webarchive.nationalarchives.gov.uk/20120919213058/http://www.communities.gov.uk/documents/communities/pdf/1179350.pdf>.
- ⁷ Ministry of Housing, Communities & Local Government, 'Controlling Migration Fund Prospectus' (November 2016) http://dera.ioe.ac.uk/28056/1/Controlling_Migration_Fund_Prospectus.pdf.
- ⁸ Melanie Gower, 'The new Controlling Migration Fund for England' (House of Commons Library, 7 December 2017) <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7673>.
- ⁹ Jonathan Portes, 'Respecting the will of the British people: immigration policy after Leave' (LSE Blog, 24 June 2016) <http://blogs.lse.ac.uk/politicsandpolicy/respecting-the-will-of-the-british-people-immigration-policy-after-leave/>.
- ¹⁰ Owen Jones, 'To take on Ukip, the left need to do more than champion the abstract idea of immigration' *New Statesman*, 6 November 2015 <https://www.newstatesman.com/politics/uk/2015/11/take-ukip-left-needs-do-more-champion-abstract-idea-immigration>.
- ¹¹ David Goodhart, 'Five Point Plan for Immigration Reform, Prior to Free Movement Change' (Policy Exchange, 7 July 2016) <https://policyexchange.org.uk/news/five-point-plan-for-immigration-reform-prior-to-free-movement-change/>. Portes (n 9).
- CBI, 'Open and Controlled: A New Approach to Immigration After Brexit' (August 2018) <http://www.cbi.org.uk/index.cfm/?api/render/file/?method=inline&fileID=4232B592-ACCC-40DB-9338BA0A97198435>.
- TUC, 'A fairer deal on migration: managing better for Britain' (21 November 2016) <https://www.tuc.org.uk/sites/default/files/TUC%20-%20A%20fairer%20deal%20on%20migration.pdf>.
- IPPR, 'A Fair Deal on Migration for the UK' (March 2014) https://www.ippr.org/files/images/media/files/publication/2014/03/Fair-deal-on-migration_Mar2013_11970.pdf.
- ¹² MAC, Final Report (n 2).
- ¹³ *ibid*, and 'The Impact of Immigration on the Well-being of UK Natives' (Report prepared for the Migration Advisory Committee, 25 May 2018) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740985/Giulietti_2018_.pdf.
- ¹⁴ Rosie Carter, 'Fear, Hope & Loss: Understanding the Drivers of Hope and Hate' (HOPE not hate, September 2018) <https://www.hopenothate.org.uk/fear-hope-loss/>.

- ¹⁵ Shamit Sagar et al, 'The Impacts of Migration on Social Cohesion and Integration' (Final report to the Migration Advisory Committee, January 2012) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/258355/social-cohesion-integration.pdf.
- ¹⁶ Thiemo Fetzer, Sascha Becker, Dennis Novy, 'Austerity, Immigration or Globalisation: Was Brexit predictable?' (CAGE, November 2018).
- ¹⁷ Mia Gray and Anna Barford, 'The depths of the cuts: the uneven geography of local government austerity' (LSE Blog, 16 October 2018) <http://blogs.lse.ac.uk/politicsandpolicy/the-uneven-geography-of-austerity/>.
- ¹⁸ *ibid.*
- ¹⁹ Sandra Wallman, *The Capability of Places* (PlutoPress, 2011).
Sarah Poppleton et al, 'Social and Public Service Impacts of International Migration at the Local Level' (Home Office, Research Report 72, July 2013) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/210324/horr72.pdf.
- ²⁰ National Conversation (n 3).
- ²¹ IPPR, Fair Deal on Migration (n 11).
Rosa Crawford, 'Immigration is not to blame for unaffordable housing' (TUC, 12 April 2018) <https://www.tuc.org.uk/blogs/immigration-not-blame-unaffordable-housing>.
Ryan Shorthouse and David Kirkby, 'A balanced centre-right agenda on immigration' (Bright Blue, 2015) <https://brightblue.org.uk/wp-content/uploads/2017/03/opinion-formers.pdf>.
- ²² Jones (n 10).
Steve Ballinger, 'High net migration needs practical response, not distractions' (British Future, 20 May 2015) <http://www.britishfuture.org/articles/net-migration-distraction/>.
- ²³ Michael Romberg, 'EU Citizens and Public Service Budgets' (Report for the Campaign for the Real Referendum, 5 January 2017) http://d3n8a8pro7vhm.cloudfront.net/london4eu/legacy_url/1393/EU-Citizens-and-Public-Service-Budgets-Report-5-January-2017.pdf?1501580599.
- ²⁴ *ibid.*
- ²⁵ HL Deb 22 July 2010 cWA245.
- ²⁶ Eric Kaufmann, 'Assimilation and the immigration debate: shifting people's attitudes' (LSE Blog, 1 October 2016) <http://blogs.lse.ac.uk/politicsandpolicy/assimilation-and-the-immigration-debate-shifting-peoples-attitudes/>.
- ²⁷ Eric Kaufmann, 'Why culture is more important than skills: understanding British public opinion on immigration' (LSE Blog, 30 January 2018) <http://blogs.lse.ac.uk/politicsandpolicy/why-culture-is-more-important-than-skills-understanding-british-public-opinion-on-immigration/>.
- ²⁸ Charlie Cadywould, 'Support for Immigration can't be Bought' (Demos, 13 November 2015) <https://www.demos.co.uk/blog/support-for-immigration/>.
Michael Sandel, 'How Markets Crowd out Morals' *Boston Review* (1 May 2012) <http://bostonreview.net/forum-sandel-markets-morals>.
- ²⁹ Shorthouse and Kirby (n 21). Romberg (n 23).
- ³⁰ Rolfe et al (n 3).
- ³¹ Ian Goldin, Benjamin Nabarro, 'Losing it: The economics and politics of migration' (VOX, CEPR Policy portal, 24 October 2018) <https://voxeu.org/article/losing-it-economics-and-politics-migration>.
- ³² MAC, Final Report (n 2).
- ³³ Ministry of Housing, Communities & Local Government, 'Controlling Migration Fund Prospectus' (August 2018) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733160/CMF_Prospectus_2018_-_2020.pdf.
- ³⁴ See for instance Suffolk County Council, 'Survey of Migrants: A Report' (August 2010) https://www.healthysuffolk.org.uk/uploads/2010-09-24_SCC_Migrant_Profile_Research_Report.pdf.
- ³⁵ See for instance Migration Yorkshire's data research project to better understand how and why migration impacts differently in different local communities in Yorkshire and Humber, and how local authorities plan for and deal with those impacts.
- ³⁶ Government Press Release, 8 June 2018 <https://www.gov.uk/government/news/19-million-funding-for-councils-to-boost-integration>.
- ³⁷ Jonathan Carr-West, 'Rudd's migration fund part of hardline policy' (In Facts, 19 October 2016) <https://infacts.org/rudds-migration-fund-part-hardline-policy/>.

-
- ³⁸ CMF Prospectus 2016 (n 7).
- ³⁹ Government Press Release (n 36). And CMF Prospectus 2018 (n 33).
- ⁴⁰ Carr-West (n 37).
- ⁴¹ Cadywould (n 28).
- ⁴² Liz McKeown, 'New ONS Centres to focus on the public policy issues that matter' (ONS, 4 October 2018) [new-ons-centres-to-focus-on-the-public-policy-issues-that-matter/](#).
- ⁴³ Romberg (n 23).
- ⁴⁴ Chris Murray and Phoebe Griffith, 'Local Migration Panel: Corby' (IPPR, August 2018) <https://www.ippr.org/files/2018-08/lmp-corby-august18.pdf>.
- ⁴⁵ MAC, Final Report (n 2).
- ⁴⁶ Romberg (n 23).
- ⁴⁷ *ibid.*
- ⁴⁸ CMF Prospectus 2018 (n 33).
- ⁴⁹ Romberg (n 23).
- ⁵⁰ APPG on Social Integration, 'Integration not Demonisation' (25 August 2017) http://d3n8a8pro7vhm.cloudfront.net/themes/570513f1b504f500db000001/attachments/original/1504379228/TC0016_AAPG_Integration_not_Demonisation_Report.pdf?1504379228.
- ⁵¹ Home Office, MHCLG and DFID, 'Funding Instruction for local authorities in the support of the United Kingdom's Resettlement Programmes: Financial Year 2018-2019' (29 June 2018) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722154/Combined_local_authority_funding_instruction_2018-2019_v2.pdf.
- ⁵² Sagar et al (n 15).
- Also see Neil Demireva, 'Immigration, Diversity and Social Cohesion' (The Migration Observatory, 1 November 2017) <https://migrationobservatory.ox.ac.uk/resources/briefings/immigration-diversity-and-social-cohesion/>.
- ⁵³ Thom Brooks, 'This is personal: Why Corbyn was right to pledge to revive the migration impact fund' (LabourList, 29 September 2016) <https://labourlist.org/2016/09/this-is-personal-why-corbyn-was-right-to-pledge-to-revive-the-migration-impact-fund/>.
- See also APPG on Social Integration (n 50).
- ⁵⁴ Ministry of Housing, Communities & Local Government, 'Integrated Communities Innovation Fund Prospectus' (July 2018) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/731882/FINAL_ICIF_Prospectus.pdf.
- ⁵⁵ CMF Prospectus 2018 (n 33).
- ⁵⁶ ICIF Prospectus (n 54).
- ⁵⁷ Ministry of Housing, Communities & Local Government, 'Integrated Communities English Language Programme Prospectus' (September 2018) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/738193/Integrated_communities_English_language_programme_prospectus.pdf.
- ⁵⁸ APPG on Social Integration (n 50).
- ⁵⁹ CMF Prospectus 2018 (n 33).
- ⁶⁰ APPG on Social Integration (n 50).
- ⁶¹ CBI, Open and Controlled (n 11). IPPR, Fair Deal on Migration (n 11).
- ⁶² Global Future, 'Movement Control: A Blueprint for Free Movement that Works for Britain' (20 November 2018) <https://ourglobalfuture.com/reports/movement-control/>.
- ⁶³ Migration Observatory Response to Integrated Communities Strategy: "Measuring Success" (1 June 2018).
- ⁶⁴ See the Government's 2011 cancellation of the Citizenship Survey as it was complex and expensive to run <https://webarchive.nationalarchives.gov.uk/20120919141001/http://www.communities.gov.uk/communities/research/citizenshipsurvey/surveyscancellation/>.
- ⁶⁵ Paul Longley, James Cheshire and Alex Singleton, 'Consumer Data Research – An Overview' in *Consumer Data Research* (UCL Press 2018).
- ⁶⁶ Office for National Statistics, 'Migration statistics transformation update: May 2018' (24 May 2018) <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/articles/migrationstatisticstransformationupdate/2018-05-24>.
- ⁶⁷ Migration Observatory Response to Integrated Communities Strategy (n 63).
- ⁶⁸ HM Government, White Paper on Future Immigration System (n 1).
- ⁶⁹ Portes (n 9).

- ⁷⁰ Carl Baker, 'Population estimates & GP registers: why the difference?' (House of Commons Library, 12 December 2016) <https://commonslibrary.parliament.uk/social-policy/health/population-estimates-gp-registers-why-the-difference/>.
- ⁷¹ See for instance Suffolk Migrants Survey (n 34); only a quarter of migrants planned to stay in the UK over 5 years and only a quarter planned to stay in Suffolk for the whole of their stay in the UK.
- ⁷² Paul Longley, James Cheshire and Alex Singleton, *Consumer Data Research* (UCL Press 2018).
- ⁷³ Marianne Mandujano, 'The future vision of international migration data – user perspectives' Panel Discussion at Conference of the Migration Statistics User Forum 2018 (19 October 2018).
- ⁷⁴ https://maps.cdrc.ac.uk/#/indicators/churn/churn_2013/BTTTTFT/10/-0.1292/51.5044/.
- ⁷⁵ Emilio Zagheni, Ingmar Weber, Krishna Gummadi, 'Leveraging Facebook's advertising platform to monitor stocks of migrants' (2017) 43(4) *Population and Development Review*, 721.
- ⁷⁶ *Consumer Data Research – An Overview* (n 65).
- ⁷⁷ Leveraging Facebook's advertising platform (n 75).
- ⁷⁸ *ibid.*
- ⁷⁹ Alyson Lloyd, James Cheshire and Martin Squires, 'The Provenance of Customer Loyalty Card Data' in 'CDR' (n 72).
- ⁸⁰ Leveraging Facebook's advertising platform (n 75).
- ⁸¹ Paul Longley, 'Use of consumer data to construct migration estimates' Presentation at Conference of the Migration Statistics User Forum 2018 (19 October 2018).
- ⁸² Leveraging Facebook's advertising platform (n 75).
- ⁸³ TUC, *A fairer deal* (n 11).
- ⁸⁴ APPG on Social Integration (n 50).
- ⁸⁵ ICIF Prospectus (n 54).
- ⁸⁶ Suffolk Migrants' Survey (n 34).
- ⁸⁷ Madeleine Sumption, 'Location, Location, Location: Should different parts of the UK have different immigration policies?' (The Migration Observatory, 25 October 2017) <https://migrationobservatory.ox.ac.uk/wp-content/uploads/2017/10/Report-Location-Regional-Migration-Policy-v2.pdf>.
- ⁸⁸ IPPR Corby (n 44).
- ⁸⁹ National Conversation (n 3).
- ⁹⁰ ONS, *Migration Statistics Transformation* (n 64).
- ⁹¹ TUC, *A fairer deal* (n 11). APPG on Social Integration (n 50). Ballinger (n 22).
- ⁹² National Audit Office, 'Home Office Departmental Overview 2015-16 (January 2017), in effect reiterated in HM Government, *White Paper on Future Immigration System* (n 1).
- ⁹³ <https://www.newamericaneconomy.org/locations/>.
- ⁹⁴ Migration Advisory Committee, 'EEA-workers in the UK labour market: Interim Update' (March 2018) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/694494/eea-workers-uk-labour-market-interim-update.pdf.
- ⁹⁵ <https://www.welcomingamerica.org/about/who-we-are>.
- ⁹⁶ <https://www.newamericaneconomy.org/about/>.
- ⁹⁷ 'CBI research shows 9 out of 10 people want business to speak out on societal issues' (CBI, 13 September 2018) <http://www.cbi.org.uk/news/cbi-research-shows-9-out-of-10-people-want-business-to-speak-out-on-societal-issues/>.
- ⁹⁸ National Conversation (n 3). IPPR, *The Integration Compact* (n 3).
- ⁹⁹ David Metcalf, 'United Kingdom Labour Market Enforcement Strategy 2018/19 (HM Government, May 2018) <https://www.gov.uk/government/publications/labour-market-enforcement-strategy-2018-to-2019>.
- ¹⁰⁰ Franck Duvell, Myriam Cherti, Irina Lapshyna, 'Does Immigration Enforcement Matter? Irregular Migrants and Control Policies in the UK' (COMPAS Final Report, October 2018) <https://www.compas.ox.ac.uk/wp-content/uploads/DIEM-Irregular-Immigrants-and-Control-Policies-in-the-UK.pdf>.
- ¹⁰¹ Nida Broughton and Ben Richards, 'Tough Gig: Tackling low paid self-employment in London & the UK' (Social Market Foundation, October 2016) <http://www.smf.co.uk/wp-content/uploads/2016/10/Social-Market-Foundation-SMF-Tough-Gig-Tackling-low-paid-self-employment-in-London-and-the-UK-October-2016.pdf>.
- ¹⁰² Oral Evidence of Rosa Crawford to Home Affairs Committee on Post-Brexit migration policy, HC 857 (22 May 2018) <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/home-affairs-committee/postbrexit-migration-policy/oral/83305.pdf>.

-
- ¹⁰³ Oral Evidence of Prof. Guglielmo Meardi to Home Affairs Committee on Post-Brexit migration policy, HC 857 (22 May 2018) <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/home-affairs-committee/postbrexit-migration-policy/oral/83305.pdf>.
- ¹⁰⁴ UK Labour Market Enforcement Strategy 2018/19 (n 99).
- ¹⁰⁵ *ibid.*
- ¹⁰⁶ Meardi (n 103).
- ¹⁰⁷ Written ministerial statement laid in the House of Commons, 24 May 2011, as discussed in Sonia McKay, 'Undocumented migrants, employers and sanctions' (8 March 2017) <http://www.ier.org.uk/sites/ier.org.uk/files/Sonia%20McKay%20paper.docx>.
- ¹⁰⁸ Migrants Resource Centre, 'MRC submission of evidence and response to the government green paper consultation on the Integrated Communities Strategy' (June 2018) https://www.migrantsresourcecentre.org.uk/wp-content/uploads/2018/06/MRC-response-Integrated-Communities-Strategy_final1.pdf
- ¹⁰⁹ IPPR, The Integration Compact (n 3).
- ¹¹⁰ HM Government, 'Integrated Communities Strategy Green Paper (March 2018) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/696993/Integrated_Communities_Strategy.pdf.
- ¹¹¹ National Conversation (n 3).
- ¹¹² CBI, Open and Controlled (n 11).
- ¹¹³ APPG on Social Integration (n 50).
- ¹¹⁴ *ibid.*
- ¹¹⁵ New American Economy, membership list, March 2018 http://www.newamericaneconomy.org/wp-content/uploads/2012/05/NAE_MembershipList_MAR2018.pdf.
- ¹¹⁶ Longley, Presentation (n 81).
- ¹¹⁷ Migration Yorkshire (n 35).
- ¹¹⁸ ICIF Prospectus (n 54). See also Meghan Benton, Antonio Silva and Will Somerville, 'Applying Behavioural Insights to Support Immigrant Integration and Social Cohesion' (Migration Policy Institute, October 2018) <https://www.migrationpolicy.org/research/behavioral-insights-immigrant-integration-social-cohesion>.
- ¹¹⁹ HM Government, White Paper on Future Immigration System (n 1).