

Written evidence submitted by Helen Bamber Foundation and Asylum Aid (AAC0090)

Introduction

1. The Helen Bamber Foundation (HBF) is a specialist clinical and human rights charity that works with survivors of trafficking, torture and other forms of extreme human cruelty. Our work alongside survivors shows us that, with early and appropriate care and support, they build the strength to move on with their lives. Our multidisciplinary and clinical team provides a bespoke Model of Integrated Care for survivors which includes medico-legal documentation of physical and psychological injuries; specialist programmes of therapeutic care; a medical advisory service; a counter-trafficking programme; housing and welfare advice; legal protection advice; and community integration services.
2. Many of our clients receive asylum support under sections 95, 98 and 4(2) of the Immigration and Asylum Act 1999. On a daily basis, we see and hear about the inadequacy of asylum accommodation, including both hotel and dispersal accommodation. HBF has also carried out over 20 assessments of people moved to RAF Wethersfield to determine whether or not they fall under the Home Office's criteria that would deem them unsuitable to be placed in 'large sites'. Those assessed have included survivors of torture and trafficking.
3. Asylum Aid (AA), part of the Helen Bamber Foundation group, provides high quality legal representation to some of the most vulnerable people seeking asylum in the UK, including but not limited to children, survivors of trafficking, and stateless people. AA's welfare advice team deliver face to face and telephone advice and information, in a community language and English, to migrants and asylum seekers in Westminster on issues related to welfare benefits, housing and asylum support as part of the Westminster Advice Services Partnership (WASP).
4. In our experience, living long-term in asylum accommodation, particularly where that accommodation is a full-board hotel or large site, worsens people's mental and/or physical health. Within the current framework it is our view that the providers do not adequately identify, deliver and maintain appropriate accommodation.
5. The government's current approach also leaves other agencies to step in where the state's subcontracted providers are not willing to, capable of or contracted to do so, with urgent safeguarding and mental health issues falling to charities to hold, and local authorities scrambling to inspect hotels and sites and consider the impact of unsuitable 'large sites' without warning or consultation.
6. We welcome the Home Affairs Committee's call for evidence on this issue, and hope that upcoming scrutiny of the current asylum accommodation contracts will further enable the government to seriously consider and utilise the break clause of these contracts in 2026. Significant improvements can be made to asylum accommodation in the UK, with a brave, humane, transformative strategy, both in terms of the provision of accommodation itself, and the asylum system as a whole.

The delivery of asylum accommodation - the Home Office's use and management of asylum accommodation contracts, including in response to growing demand and changing needs

7. The Home Office and its contractors' approach to asylum accommodation is not fit for purpose. The for-profit companies contracted to provide this accommodation are the only parties who benefit; they turn millions in taxpayer-subsidised profit, all for overseeing and enacting a system which dehumanises and frequently further traumatises vulnerable people seeking asylum, including many survivors of torture, trafficking and other human rights abuses.

Use of large sites

8. For too long, the Home Office has relied on procuring large (mostly ex-military) sites, which have caused profound harm. Reports published by the Helen Bamber Foundation and Humans for Rights Network in December 2023 and June 2024 showed the exceptionally high levels of suicidality and self-harm of those housed in RAF Wethersfield and the negative impact on mental health of being housed in an isolated living environment, with little to no privacy, inadequate access to healthcare, legal services and community support, and inadequate assessment of/response to vulnerability and risk.¹ While other large sites have been closed or abandoned, including the Bibby Stockholm and RAF Scampton, it is extremely concerning that Wethersfield continues to be used.
9. Running such sites has come at huge expense, both human and financial. The National Audit Office (NAO) found that rapidly developing such large sites for this use incurred huge spending and increased risk, and indeed the Home Office's own analysis found that these initiatives cost more than hotels.² Acknowledged as high-risk and likely unachievable projects by government auditors, the legacy of these sites (once finally and fully closed) will be that they were solely an (expensive) exercise in cruelty.

Use of hotels

10. Concerns about the Home Office's reliance on the use of hotels have been well-rehearsed. Beginning roughly at the outset of the Covid-19 pandemic in the first quarter of 2020 and in response to growing demand, this situation is now chronic within the asylum accommodation estate.
11. In a clinical study undertaken with clients of the Helen Bamber Foundation in 2023, summarised in a report we published in June 2024, analysis of quantitative clinical data from 110 participants found higher levels of mental health difficulties for asylum seekers living in hotels compared to asylum seekers living in alternative housing.³
12. The key themes drawn out by our report include people in asylum hotels feeling a lack of safety (associated with a lack of privacy, re-traumatisation, impact on mental health), a lack of

¹ Helen Bamber Foundation, [Ghettoised and traumatised: the experiences of men held in quasi-detention in Wethersfield](#), December 2023; and Helen Bamber Foundation, At what cost? [The ongoing harm caused to men seeking asylum held in Wethersfield](#), June 2024

² National Audit Office, [Investigation into asylum accommodation](#), March 2024

³ Helen Bamber Foundation, [Suffering and squalor: the impact on mental health of living in hotel asylum accommodation](#), June 2024

autonomy (associated with unmet basic needs, the feeling of being imprisoned, a lack of control, and the harm this causes children and families) and social isolation (associated with feeling disconnected from community and peers, and issues with hotel staff). The research also identified what changes are needed to mitigate these adverse experiences, including improving food, access to services, hotel staff behaviour and the provision of alternative types of housing.

13. All of the above is compounded by the sheer length of time people remain in hotels; we currently work with families who have children who have now lived most of their lives in a hotel room. Whilst outside of the scope of this call for evidence, another exacerbating factor is the meagre subsistence levels issued to people living in full-board hotels; at the time of writing, £8.86 per person per week, an amount the Home Office decided to decrease from £9.58 in 2023.
14. We outlined the problems with hotel accommodation (explored below) extensively in our June 2024 report, 'Suffering and Squalor,'⁴ and these have been repeatedly shared with the Home Office. Rather than introduce meaningful changes to improve the experiences of people in this accommodation, in 2023 the Home Office introduced 'Operation Maximise'. Intended to reduce the amount spent on hotel asylum accommodation, Operation Maximise aimed to ensure that rooms currently inhabited by one person were occupied by as many people (strangers) that could be housed in the same room.
15. The implementation of Operation Maximise was chaotic, with miscommunication and misadministration throughout, leading people to being forced to share rooms with strangers even where they should be exempt according to the Home Office's own 'Allocation of Accommodation' policy (which itself has since seen concerning updates, greatly increasing the threshold at which a person should be considered unsuitable for room-sharing or large sites).
16. Decision-making responsibilities regarding the suitability of a person's accommodation needs have been delegated to the subcontracted accommodation providers. This has resulted in poor decision-making and goes far beyond the role and competencies of these providers, who are not – and should never be – in a position to be making decisions as to whether a severely traumatised person should be required to share a bedroom with a stranger, and to handle the disclosure of the reasons as to why they may not be.
17. Relevant to this call for evidence, it emerged throughout the onset of Operation Maximise that the sheer number of subcontractors (the main providers being Clearsprings Group, Mears, and Serco), hotel staff across hundreds of hotels and other agencies (such as those involved in transporting people to and from accommodation) within the asylum accommodation contracts compounds the difficulty inherent in understanding how things should work, both for people housed in asylum accommodation and those supporting them. During Operation Maximise, we saw some hotel companies issue as official policy their own (incorrect) versions of the Home Office's criteria as to suitability for room-sharing. In 2021, we saw other hotel companies introduce their own restrictions on people's freedom of movement which were more restrictive than even the Home Office's own policy.

⁴ Helen Bamber Foundation, [Suffering and squalor: the impact on mental health of living in hotel asylum accommodation](#), June 2024

18. Our experience of Operation Maximise suggests that a ‘quick fix’ within the existing estate to resolving the issue of the disproportionate reliance on hotels is unlikely to be effective. Remedying this issue will require a humane transformation of asylum accommodation, focusing on housing people in accommodation within communities, in which they can live dignified lives.
19. We welcome the recommendations of IPPR’s report, ‘Transforming Asylum Accommodation’,⁵ and recent calls from the Secretary of State for Housing, Communities and Local Government, that local authorities be empowered to provide accommodation for people seeking asylum, rather than profit-seeking companies, to have the best opportunity for accommodation to be provided safely, humanely and effectively at a local level.

The performance of providers delivering the current contracts on identifying and delivering appropriate accommodation

General standards – hotels

20. The clients we support living in hotels report poor standards in all areas, including but not limited to:
 - inadequacies in the food provided and how it is provided;
 - general disrepair (including mould, infestations and serious safety defects);
 - a lack of communal space and overcrowding, lack of ventilation, actual or the threat of room-sharing (either with strangers or family);
 - issues with other residents (including abuse and threats of or actual physical violence);
 - issues with staff (including inappropriate behaviour particularly towards female residents by male staff and unannounced room checks, punitive or withholding treatment, and the fear of worse treatment or retribution if a complaint is made); and
 - stigma from local residents who are aware that the hotel is used as asylum accommodation and fear of actual or anticipated far-right activity.
21. Our June report provides more detail on these issues.⁶ Between November 2024 and January 2025, HBF and AA spoke to/reviewed the records of 86 clients to assess the extent to which these problems still exist and we remain extremely concerned regarding the standards of hotel asylum accommodation in London.
22. For example, we continue to see doctors’ letters and reports regarding the poor nutrition provided. In one case, a client’s GP felt compelled to write to the hotel, explaining that she has iron deficiency anaemia with gynaecological issues both causing and exacerbating this condition, and to request that the hotel incorporate more iron-rich foods in the meals, such as lentils, beans, spinach, dried fruit and red meat. Another GP report recently stated: *“the food is mostly processed food and rich in carbohydrate, likely contributing to constipation and haemorrhoids. [...] I believe an accommodation with his own room and preferably food rich in fibre provided by the hotel will be helpful.”*

⁵ IPPR, [Transforming asylum accommodation](#), October 2024

⁶ Helen Bamber Foundation, [Suffering and squalor: the impact on mental health of living in hotel asylum accommodation](#), June 2024

23. A mother and two teenagers were moved into a hotel outside of London. There are no cooking facilities, and they are unable take snacks to their room as they are not allowed to eat in the rooms. Her children sometimes arrive a little late from school and due to the rigid meal times they have to miss out on dinner.
24. One client lives with her 19 year old son in a single room in a hotel. She has complained that the room is not suitable for her disability and multiple health issues. The room is on the ground floor, next to the main door of the hotel, and this has a negative impact on her sleep and feeling of safety.
25. Clients continue to report that hotels feel overcrowded, with insufficient communal space. Clients experiencing symptoms of Post Traumatic Stress Disorder have reported issues with the level of noise they inevitably are exposed to whilst sharing a hotel with hundreds of people, and that this amount of noise has increased hypervigilance and intrusive memories of past trauma.
26. One client reported that she lives in one room with her younger daughter, with her older son in another room. As well as this room being very small and without enough room for her daughter to study and do her homework, there are also no windows in their room.
27. Another client living in a hotel (and a recognised survivor of trafficking) reported that his room had no window and said: *'I don't get any natural light, and I also have a problem with ventilation, I cannot get any fresh air. I feel like when I did in prison, it makes me more stressed, I cannot know whether it is day or night, or if it is raining or sunny.'*
28. We support many clients who share rooms with their children, sometimes multiple family members in one room, and have now done so for several years. Whilst this is unsuitable in any case, living in such close proximity with many family members, some of whom have mental health difficulties, can also increase the risk of child traumatisation as well as domestic violence (this was widely evidenced during the pandemic). Also, for children with special needs, such as learning disabilities and autism, living in such overcrowded conditions can be particularly unsuitable and clients have reported bullying by hotel staff and/or other residents.

General standards – dispersal accommodation

29. In terms of dispersal accommodation, while some of the issues of living in a full-board hotel are alleviated (e.g. people can cook for themselves, live with fewer people, come and go as they need without needing to report their presence to a hotel receptionist), we still see a great number of issues with the adequacy of accommodation provided. We frequently receive reports of disrepair and other physical issues in both dispersal and contingency accommodation, which appear to not be resolved in a timely and reasonable way by Clearsprings/Ready Homes. Clients frequently report that when they have reported an issue, it has taken a long time to be fixed, and is not fixed in the long-term, requiring consistent maintenance.
30. We have seen evidence of at least two ceilings almost wholly collapsing, just this year. In one case, this happened after protracted reporting of the damp very evident in the (dispersal) accommodation, and the ceiling partially collapsed whilst the parent and their two children were in the room. Clients have reported rooms with mould; rotten carpets; unclean bedding; rooms smelling of sewage; broken beds; worn-out mattresses; mice, rats, bedbugs and cockroaches.

The presence of mice in rooms is of course also a serious problem for residents who have small children or allergies.

31. Language barriers, digital literacy, mental health and other vulnerabilities, and fear of impacting a person's asylum claim making it harder for people in asylum accommodation to raise and escalate issues via official channels when needed. Furthermore, clients reporting such issues whilst living in dispersal accommodation are often reluctant to push the issue much further (i.e. via an official complaint, or legal action) because of their fear of being moved into a hotel (and the risks attendant to this; i.e. being moved to a different area (within London or an entirely different part of the UK); that they may be more likely to be forced to share a bedroom with a stranger; loss of autonomy; having to rely entirely on food provided by the hotel; and having to rely on even more limited financial subsistence).
32. We have recently supported several clients who have reported disrepair issues for some time, and, after we have then contacted Migrant Help on their behalf regarding the issue and the matter has been escalated, these clients have – seemingly because the disrepair was so severe – been put back into contingency hotel accommodation, effectively beginning again (having in most cases very recently spent an exceptionally long time in hotel accommodation already). In one such case, after several months back in a hotel, they have been moved back to the same dispersal accommodation, and the issue is still present.
33. We are concerned that accommodation providers are only required to self-report their performance, and that this system is largely unchanged from previous contracts. The Independent Chief Inspector of Borders and Immigration has, over several years, made recommendations of more effective contract compliance inspections. Whilst the providers continue to self-report that they invariably perform well by meeting their Key Performance Indicators and are rarely held to account by the Home Office.
34. In terms of escalation with Home Office, Clearsprings Ready Homes and Migrant Help, charities have to rely on specifically-agreed escalation routes, to which people in asylum accommodation themselves do not have access to, in order to often receive a(n appropriate) response to the issue, speaks to the fact that the system is not up to standard.

Staff behaviour

35. Another related issue which has come up frequently is issues of staff behaviour in general, including inappropriate behaviour towards female residents.
36. Unannounced room visits appeared frequently as a regular occurrence of peoples' experience of hotels, and an issue that exacerbates a person's usually already-limited sense of safety. A client living in a hotel with her two sons recently raised the issue of unannounced checks of her room; twice so far she has been exiting the bathroom and found that a maintenance person has let themselves in. She spoke to the housing manager and now feels that she is being treated differently for having complained. Her older child (who has a separate room) feels nervous to speak to housing management about the light in his room and the lock on his door not working.
37. One client requested laundry powder and was told she could not be given any more. She asked the staff member why and was told 'you're living here and getting things for free and we are

paying taxes to keep you here'. She reported this and the hotel manager asked for the name of the staff member but she did not know their name, and was worried about the impact of making a complaint.

38. One client, a survivor of trafficking and domestic violence with severe mental health symptoms, has reported that her housing officer used to be 'really nice', complimenting her and her appearance and offering her phone number. She feels that she is now treated differently and more punitively since the housing officer is now aware that she is in a relationship. She does not feel able to make a complaint about this.
39. In our experience, clients, particularly those most vulnerable, struggle to make complaints, particularly where it relates to the behaviour of staff or other residents, for fear of the consequences they will experience. The complaints and resolution process requires review as to how vulnerable people can be empowered to report issues without fear of - real or perceived - reprisal.

Decisions around placement, suitability of accommodation and the process of being moved

40. The process of being moved to asylum accommodation is a very stressful experience itself; people may receive notice only by text the day before (if they receive and are able to understand the message in English), that a taxi will arrive at their address (if recorded correctly) anytime between 8am and 5pm and transport them to new accommodation, which they may only find out if they feel able to ask the taxi driver. It is very difficult for a person to refuse to move to asylum accommodation, and they are likely to be requested to rapidly provide written reasoning for having done so; this applies even when the person has been informed by the Home Office that it is accepted that they require a certain kind of accommodation – for example, a single-occupancy bedroom, and yet the providers still transport them to a shared dormitory.
41. We have supported numerous clients who have been deemed unsuitable for room-sharing (in writing) by the Home Office itself who have then been moved at no notice to a room shared with a stranger. It is still unclear where the root of this issue lies, however it appears that little consideration to safeguarding is paid by providers when allocating accommodation and transporting people to new accommodation. It is likely that data-sharing remains problematic, both internally between Home Office departments, and with their accommodation providers. Moves to inappropriate accommodation happen routinely in our experience, however most severely when new, headline-grabbing initiatives are rolled out at pace (such as Operation Maximise and the mass closure of large hotels).
42. It should be noted that where someone is housed in unsuitable accommodation (be that a shared room, a property with significant disrepair, disability access needs that are not being met, living in housing at which they are at risk of abuse), legal action is often the only or at least the only effective recourse to ensure the person is moved to somewhere more suitable. Pre-action protocols and judicial reviews abound in the Home Office's asylum support casework, at presumably significant costs, because of intolerable situations which would be avoidable in an effective, functioning system which prioritises safety and dignity.
43. For some time, treatment from the Helen Bamber Foundation has been accepted in written policy by the Home Office as a reason for why our clients should be housed within London, in

order to access the highly specialist trauma-focused therapy we provide. We see regularly that people, in relation to whom we have informed the Home Office and accommodation providers that they require accommodation in London under this policy, are informed that they will be dispersed to towns across the UK. We supported a client whose disabled child was supported by the local authority and other support via an Education, Health and Care Plan, and as such the Home Office eventually agreed that the family required accommodation within one particular borough. Despite this requirement being known to the accommodation provider, they continued to try and move them to accommodation elsewhere.

Safeguarding and supporting the welfare of people in asylum accommodation

44. The inadequacy of asylum accommodation across the board, in addition to the vulnerabilities experienced by many people seeking asylum, means that safeguarding issues frequently arise. Our experience is of poor performance by contract providers in safeguarding and supporting the welfare of people in asylum accommodation.
45. The Home Office and its subcontractors are not subject to the same legislated responsibilities for safeguarding as other statutory bodies, and have their own procedures for safeguarding, which leads to further complications. The remit and procedures of the Home Office and its subcontractors continue to be unclear to many supporting people seeking asylum, including ourselves. However, where safeguarding issues are often acutely related to the person's accommodation, or it is relevant context, it is not sufficient just to refer to the local authority based on their legal safeguarding responsibilities, when the Home Office and its subcontractors can and should be responsible for the situation developing in accommodation they manage and oversee.
46. Research recently commissioned by the Greater London Authority (GLA) on safeguarding people seeking asylum in London found that there exists a lack of evidence as to the delivery and effectiveness of training required for subcontractors (including sub-subcontracted hotel staff). We rarely receive responses from Clearsprings' safeguarding team, and – like many others supporting vulnerable people seeking asylum – have to make contact directly to the Home Office to have a hope of receiving a response. The lack of clarity regarding the safeguarding procedures of the Home Office and its subcontractors has resulted in NGOs holding more than a tolerable level of risk in terms of safeguarding people, often in very vulnerable situations.
47. NGOs are much better placed to see situations in which a safeguarding issue is likely to arise. They often feel they have no choice but to refer issues as a safeguarding matter, notwithstanding the statutory threshold, as it is highly likely that the situation will become so without timely and appropriate intervention. It can feel necessary to make safeguarding referrals to multiple agencies, in order to try and ensure that the situation is given some well-timed consideration.

Managing and sharing data

48. We are concerned about the management and sharing of data within the Home Office and its subcontractors. As drawn out in other areas earlier in this submission, we frequently see that information which is known to one area of the Home Office has not been shared with or made accessible to another part of the asylum accommodation system. This could include, for

example, specific accommodation requirements (for example, an exemption from room-sharing, requirement to live in a particular area or on the ground floor). It is very concerning that the same may be the case for safeguarding; the aforementioned report commissioned by the GLA found a less than robust state of information sharing within the asylum support sector, meaning more ineffectual safeguarding of vulnerable people.

49. Flaws in information-sharing arrangements are also particularly concerning where the information required to be shared with the Home Office and its subcontractors is of an exceptionally sensitive nature, and that Home Office policy and procedures frequently require a high evidential burden (e.g. clinical information regarding housing issues, suitability to share a room, other access needs).
50. The paucity of information-sharing mechanisms was very evident during Operation Maximise, when (as above) many people were required to share a room despite the reasons for which they should be considered exempt being known to at least parts of the Home Office.
51. Similarly, during the rollout of a new contract for the provider of the pre-payment cards on which asylum subsistence is issued, we and the rest of the NGO sector saw many people for whom it took several months to receive a new card (and thus remaining destitute throughout), as replacement cards were sent to incorrect addresses, addresses at which they did not live anymore or had never lived at. We are also aware of reports of this failure to ensure addresses are correctly updated leading to asylum claims being treated as withdrawn because correspondence is sent to an out-of-date address by casework teams, despite the person being in asylum support accommodation.
52. We have been informed by the Home Office that significant work has been undertaken in the last year to consolidate and streamline addresses across their various workstreams, however these problems continue to arise. Recently, a client was sent a letter asking for his reasons for why he 'failed to travel' to alternative accommodation; he had not travelled because the transport sent to take him to alternative accommodation was sent to an address he had been moved from, by the Home Office, several weeks ago. Where people are housed in asylum accommodation, there should be no reason that their current address is not known and used across the board by the Home Office and its various subcontractors.

The Home Office's approach to the distribution of asylum accommodation at a regional and local level

53. The Home Office still frequently houses people in areas from which they are unable to access the services and support that they need. It is essential that people be housed in localities in which they can access the services they need, particularly considering the 'destitution'-based subsistence provided to them. People in asylum accommodation face prohibitive difficulties in affording transport due to the low rates of financial support, as outlined in our proposal for free bus travel for people seeking asylum.⁷
54. Services people need to use and be accessible include: public transport, GPs, schools and further education provision, NHS mental health provision; the latter crucially should include services

⁷ Helen Bamber Foundation, [Free bus travel for people seeking asylum in London](#), July 2024

with a trauma service providing evidence-based trauma-specific interventions, given the high prevalence of mental health conditions amongst people seeking asylum, in particular Post-Traumatic Stress Disorder, depression and anxiety.

55. Crucially amongst the services people require access to is legal aid-funded advice and representation. Whilst outside the specific scope of this inquiry, there is a severe dearth of legal aid-provided immigration advisers and solicitors in the UK. Asylum claims are in many cases a matter of life and death, and people seeking asylum need access to free (via legal aid) immigration advice. People seeking asylum are increasingly unable to access this, and we know that this has a significant impact as to whether someone's claim for asylum will receive a fair hearing. At the end of September 2024, there were 34,000 asylum appeals waiting to be determined by an immigration tribunal which is increasingly required – and yet not set up – to work with litigants in person. Decision-making and access to free, high-quality immigration advice are factors which keep people in asylum accommodation for far longer than is necessary, and this nexus should be considered by the government.
56. Single men seeking asylum have been housed in RAF Wethersfield site since 12 July 2023. In numerous reports, NGOs working in Wethersfield have highlighted significant growing concerns around the harm being caused to those held there, in part due to its isolated location and the lack of accessible vital services.⁸ Since July 2024 the Home Office has made decisions on asylum claims submitted after March 2023, including for people who have been accommodated at Wethersfield until shortly before the decision, and NGOs are extremely concerned about access to justice in a site widely recognised as remote; situated in a legal advice desert; and lacking in the infrastructure required to facilitate meaningful access to legal advice (despite clear obligations regarding facilities and privacy in the Statement of Requirements for the site, which Clearsprings should be upholding). Our experience is that there are significant problems onsite, including no information regarding law firms with capacity provided; no financial or logistical support provided for men to travel to legal appointments; insufficient private spaces or access to computer equipment or Wi-Fi to facilitate access to legal advice and no privacy - men are forced to disclose private matters in an environment that they are likely to be overheard. Men are attending interviews having never spoken to a lawyer or received any legal advice.⁹

⁸ See Helen Bamber Foundation and Humans for Rights Network, [At what cost? The ongoing harm caused to men seeking asylum held in Wethersfield](#), June 2024 and Doctors of the World and Médecins Sans Frontières, [“Like a prison: No control, no sleep” - Mental Health Crisis at Wethersfield Containment Site Briefing Note](#), May 2024

⁹ Helen Bamber Foundation, Asylum Aid, Asylum Matters, Care 4 Calais, Doctors of the World, Humans for Rights Network and the Immigration Law Practitioners Association, [Wethersfield and Access to Justice](#), November 2024

The Home Office's engagement and joint working with local authorities, local health services, NGOS and other local partners

57. We believe that the Home Office's engagement and joint working with these organisations, has been inadequate and adversarial in recent years, with very little, if any, meaningful consultation on changes to policy and practice. The ICIBI's report, "*An inspection of contingency asylum accommodation*", published in 2024, states that the lack of meaningful engagement and poor ('one-way') communication by the Home Office "*has been a recurring theme of inspections over many years*". In particular with regards to engagement with NGOs, which rings true to our experience over several years, the ICIBI found that the Home Office:

"has been much less effective in engaging constructively with some of the more critical stakeholders, including some NGOs who have been providing direct support to individuals in contingency accommodation.

*While it will never be able to satisfy some critics, it is clear that the Home Office still has a long way to go to build trust and confidence in its willingness to be open and honest about its intentions and performance, and any reluctance to share information, whether real or perceived, will be seen as evidence that it is not. Timing is all-important, and while there are risks in engaging early, it must avoid any hint of 'too little, too late'."*¹⁰

58. As for engagement with local authorities, many have taken legal action against the Home Office's plans to house people in their areas without consultation or the opportunity to plan for the arrival of potentially a large number of people, many of whom may also have high needs.

59. Local authorities, local health services, NGOs and others should be considered by the Home Office and its contractors as key assets, and holders of significant expertise. NGOs, such as the Helen Bamber Foundation and Asylum Aid, work with people seeking asylum on a daily basis and are well aware of people's needs seen holistically.

60. Many local authorities are motivated to support people seeking asylum and have built capacity to do so in recent years.¹¹ They are intrinsically connected to processes including safeguarding children and vulnerable adults, monitoring and enforcing standards of accommodation, public health, local services, and the issues arising after a person is granted leave to remain and leaves asylum accommodation in their area.

The impact of the current approach to delivering asylum accommodation on local services

61. It is important to avoid the rhetoric that people seeking asylum and living in accommodation negatively impact the availability of services in the areas they are housed. Rather it is our experience that people seeking asylum very frequently face significant barriers to accessing local services (such as GPs, educational and vocational courses), due to issues of their lack of documentation, limited English and/or literacy, digital exclusion, lack of awareness by services of their entitlements, limited funds for travel, fear of NHS charges, and the impact of a person's mental and/or physical health, as well as frequent short-notice moves to new areas. Lack of

¹⁰ Independent Chief Inspector of Borders and Immigration, [An inspection of contingency asylum accommodation November 2023 to June 2024](#)

¹¹ <https://www.lse.ac.uk/geography-and-environment/research/lse-london/documents/Reports/LSE-Policy-Brief-on-Asylum-Report-FINAL.pdf>

timely access to appropriate healthcare (including maternity care) is a matter of public health concern as well as of course for the individual themselves.

62. It is our position, borne out of clinical and casework experience, that, in many cases, being housed in asylum accommodation impacts people's health (both mental and physical) negatively, and leads to increased safeguarding issues and risk to self. Local services, health services and NGOs in particular, currently step into these gaps where the Home Office and its contractors are not able to, however these services would be far less impacted were asylum accommodation habitable, dignified, safe, and rooted in communities, and were people seeking asylum issued providing with enough financial support to enable them to travel both to hospital and to buy their child school uniform or a winter coat.

The Home Office's approach to working with local partners to support people who have been granted refugee status and are leaving asylum accommodation

63. The approach up until recently to supporting people who have been granted refugee status (or other types of leave to remain) and are leaving asylum accommodation has been woefully inadequate.
64. This is particularly the case when previous governments, after long periods of ineffectiveness and delays in asylum claim decision-making, have significantly increased the number of decisions made in a rapid timeframe. This occurred most notably in the second half of 2023 and coincided also with the novel use of a minimum of just 7 days' notice, all but guaranteeing significant increases in homelessness amongst newly recognised refugees.¹² A report from the Local Government Association on the impact on local authorities of the 'Asylum Backlog Clearance' of this period highlights the additional pressure and increased homelessness presentations placed on local authorities at this time, and of the unacceptable levels of homelessness and destitution amongst new refugees.¹³
65. It is a very welcome, long-awaited for development that the Home Office are now trialling an extension to the move-on period for newly recognised refugees and others leaving asylum accommodation. This development is a tangible shift away from the approach of previous governments, and a tentative step towards ending what has effectively become an 'asylum to homelessness' pipeline.
66. We are aware of several local authorities who now offer specific support for people in asylum accommodation in their area (both before and after they are granted leave to remain), which is very welcome. We understand that local authorities use the Asylum Dispersal Grant to meet some of these additional costs also, however much more support is needed. We have so far had no experience of working with the Home Office's 'Asylum Move On Liaison Officers' (AMLOs) and so cannot comment on the effectiveness of this initiative. The offer provided via Migrant Help's services is inadequate for the scale of the issue.

¹² Centre for Homelessness Impact, [Homelessness, refugees and resettlement](#), 2024. Government statistics show that from October 2022 to September 2023, there were 6,020 households owed a homelessness duty who were identified as former asylum seekers, in comparison to 3,670 for the year prior – see DLUCH, MHCLG (2024), '[Statistical data set: Tables on homelessness](#)'

¹³ Local Government Association, [Moving on from asylum accommodation: The impact and learning from councils on the asylum backlog clearance Research Report May - June 2024](#)

67. In addition to further support for local authorities and others in supporting new refugees, attention must be paid to the structural issue of the 'move on' period, its interaction with the implementation of eVisas (which in many cases will delay or 'use up' the precious days of the now-extended move-on period), the limited opportunities for new refugees to have been able to prepare for finding their own housing, and – as a general issue impacting the UK – a severe lack of affordable accommodation in the private rented, supported and social housing sectors.

Recommendations

68. HBF and AA have made the following recommendations regarding asylum accommodation:

- The Home Office should recruit, resource and train decision makers to ensure that quality asylum decisions are made as soon as possible – which should normally mean within six months. Efficient management of the asylum system will reduce and then eliminate the need for hotels to be used.
- All accommodation centres on ex-military sites/barges should be closed immediately, with all plans to open further similar accommodation abandoned. Reliance on hotels should be phased out entirely as a matter of urgency, with strict time limits on people's stays there while they continue to be used.
- People seeking asylum should be housed in communities. This should be facilitated by urgently addressing the long-standing structural issues in the management and monitoring of contracted provision, and by significantly investing in improvements to the current stock of dispersal housing.
- Asylum accommodation and support should not be a for-profit enterprise – instead central government resource should be invested in the expansion of accommodation in communities through work with local authorities, charities and other stakeholders.
- While contracted for-profit accommodation continues to exist, accountability and reporting mechanisms should be put in place immediately with financial penalties for providers who fail to comply. This includes the introduction of licensing of hotel asylum accommodation, with stronger enforcement of licensing and regular inspections of HMOs by local authorities.
- A robust and accessible complaint mechanism should be implemented for people in asylum support accommodation.
- The Home Office should require all contractors to adopt and publish robust safeguarding policies and procedures with publicly accessible information about when and how to make safeguarding referrals and clear lines of accountability.
- Comprehensive support needs assessments should be completed by the Home Office (not by sub-contracted providers such as Clearsprings) and used to ensure suitable asylum accommodation placements for people with physical and mental health conditions.
- Asylum support rates should be set at a level that allows for an acceptable standard of living, at a minimum of 70% of the rate for mainstream benefits. People living in hotels should receive the full rate of asylum support.
- Catered food standards should be increased to meet the standards for school meals, and at least adequate standards of hygiene and nutrition, particularly for people during infancy, childhood, pregnancy, breastfeeding, and people with medical dietary requirements.

- No families should be housed in hotels without kitchens in which they can cook their own food.
- There should be minimum notice periods for dispersal/ moves with clear information about lines of escalation where there are grounds to challenge a move.
- A system should be established to ensure that where a person is in asylum accommodation, this is accurately recorded on all Home Office systems and automatically kept up to date, with visibility of imminent moves to ensure that important correspondence is sent to the correct address.

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