

Written evidence submitted by The Greater London Authority (AAC0135)

Asylum Roadmap: Lessons Learned in London

The GLA welcomes the opportunity to contribute to the Home Affairs Select Committee Inquiry into Asylum Accommodation

The GLA has produced the report below and believe it is relevant to the terms of the inquiry. The report has not been published elsewhere.

Background

The Government is determined to deal with the asylum backlog and end the use of asylum hotels. There are several pathways for the Government to take this forward. This paper takes a 'lessons learned' approach based on previous efforts to clear the backlog of claims and makes recommendations for how the Government can deliver its ambitions, minimising harm to people currently stuck in asylum 'limbo', avoiding significant knock-on impact to wider public and voluntary services, and proactively shaping a positive agenda on welcome and integration. The GLA is aware that Government itself is undergoing a process of learning lessons, and we hope this will be a contribution to this exercise.

This paper assumes that in order to reduce the backlog the Government will need to increase the speed and efficacy of its asylum decision making, and reflects on London's experience of a recent rapid decision-making approach of the previous government through the rollout of the Streamlined Asylum Process (SAP) from February 2023. While fast decision making is possible and can bring huge benefits to individuals within the system, and wider public services, there is an increased risk of harm and destitution that we are keen to avoid through a renewed approach.

This paper also takes a holistic, place-based approach to the knock-on decisions that will need to be made by taking the same lessons learned approach to managing rough sleeping and homelessness risks, overseeing the closure of asylum hotels, and embedding an integration approach to work in London.

The paper does not deal with another significant government aim, which would also reduce the use of asylum contingency hotels: the expansion of the dispersal accommodation estate. This is in recognition of other real-time discussions taking place on this issue, and the need to build consensus in London for long-term solutions.

The paper is also informed by the Six Principle for a Place-Based approach developed by London local government in 2022. It draws on the following sources:

1. A GLA Migration Team review of the Streamlined Asylum Process with support from the GLA Rough Sleeping Team.
2. The submission of the London Strategic Migration Partnership (LSMP) to the Home Office's 2024 lessons learned review on hotel closures.
3. A lessons learned review by London Councils of Humanitarian Crises in recent years (in draft).
4. A document setting out London Councils' priorities for the new government.
5. The Asylum Welcome Toolkit, which was funded by the Mayor of London.

This paper has been presented to the London Asylum Oversight Group for feedback on 31.10.2024, and was shared with the London Strategic Migration Partnership Board on 17.12.2024 for partners to consider the recommendations.

1. Learning Lessons from the 'Streamlined Asylum Process'

In early 2023 a commitment by the previous Government to clear the backlog of asylum cases introduced the 'Streamlined Asylum Process' (SAP), which prioritised quick decisions on claims from countries which typically have a high grant rate. The SAP made a notable change to asylum processing that enabled decisions to be made on asylum claims without a substantive asylum interview.

While we understand that the Home Office is not considering a repeat of this exercise, the outcomes are nonetheless relevant to consider given any increase in the speed of decision making. The 'by whatever means' approach could have a similar impact on people seeking asylum and wider public services. We are also aware that the Home Office may look at options to prioritise nationals according to high grant-rate countries, and thus the lessons here will be relevant should this approach be adopted.

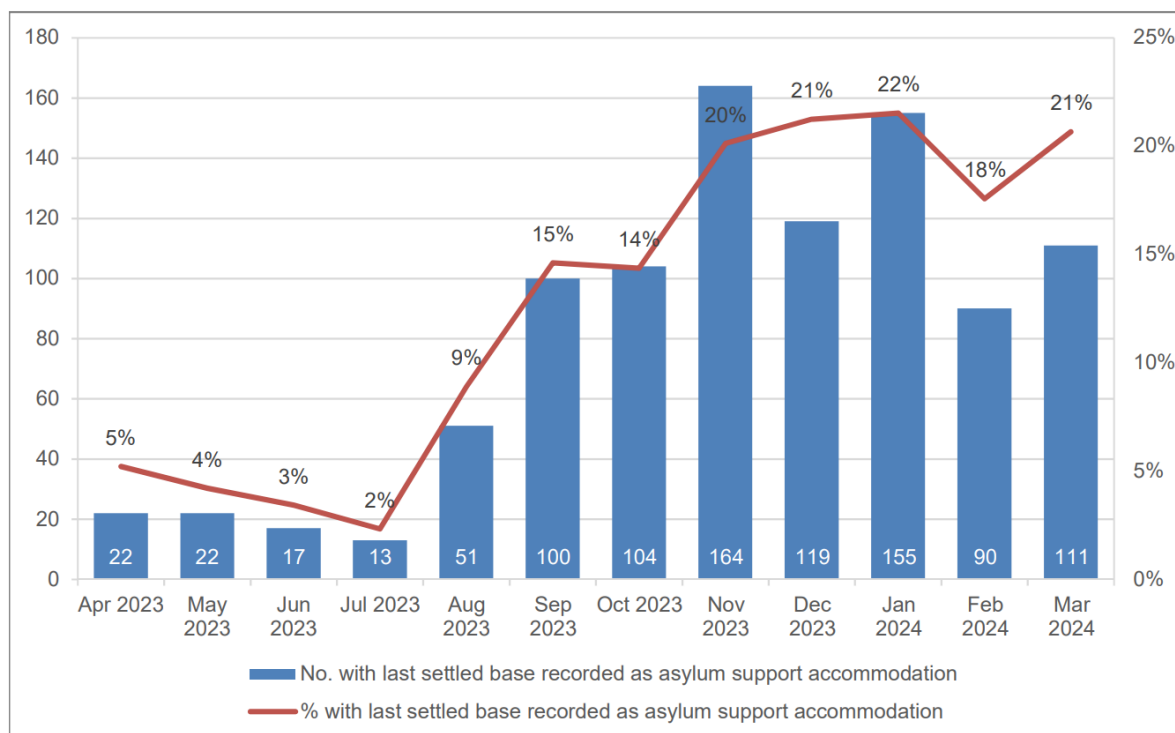
As a result of the SAP, along with an increase in asylum caseworkers, the Home Office processed over 41,800 asylum applications in the year ending in September 2023. This is 2.5 times more than in the previous year. In the same period, there were 17,316 withdrawn asylum applications, more than four times the number in the previous year, when there were 4,260.

While withdrawn claims may occur for several varied reasons, the disproportionate increase in withdrawn claims compared to applications processed would suggest that the SAP process itself could have led to an increase in withdrawn claims. Indeed, during this time Home Office expanded the reasons for a claim to be considered implicitly withdrawn to include not keeping contact details up to date and in cases where someone misses a reporting appointment. There is considerable evidence in London that the process led to an increase in rough sleeping and homelessness amongst newly recognised refugees.

1.1 Rough Sleeping and Homelessness Risks

The chart below provides a monthly breakdown of people who started a new rough sleeping episode during 2023/24, either as a new or returning rough sleeper, whose last settled base was recorded as asylum support accommodation. The month designation is based on the month in which their rough sleeping episode started, rather than the month they left the accommodation.

Chart 8: New and returning rough sleepers during 2023/24 whose last settled base was recorded as asylum support accommodation, by month



Baseline for percentages is the total number of new and returning rough sleepers during the month who had information recorded about their last settled base (including that the last settled base was not known).

SAP was rolled out in February 2023. As questionnaires began being sent to Londoners seeking asylum and decisions issued, London witnessed an increase in new rough sleeping presentations, as newly recognised refugees left asylum accommodation. According to data recorded on CHAIN, increases in rough sleeping presentations of up to 22% were recorded. It is likely that the increase in the number of people seen rough sleeping after leaving asylum support accommodation is related to Home Office policy and operational changes made in 2023.

Additionally, during 2023 the Home Office temporarily amended their approach to the 28-day 'Move-On' period for all newly recognised refugees to vacate asylum accommodation. Operationally, the 28-day 'Move-On' period had previously been linked to when a Biometric Residence Permit (BRP) is issued and commenced with the notice of asylum support being discontinued. However, in August 2023, the Home Office revised this process so that the 28-day period started from the date that the individual was served their asylum decision. This meant that in practice, that the minimum 'Notice to Quit' period for newly recognised refugees following receipt of their BRP was reduced from 28 days to just seven days. The Home Office has stated that the normal process was reintroduced in September 2023. The first of these changes increased the number of evictions from asylum accommodation, while the second significantly reduced the window of opportunity to prevent homelessness among those who received a decision.

Of those new rough sleepers during 2023/24 with information recorded about their last settled base prior to sleeping rough in London, 951 (17% of the total) reported that they had been staying in asylum support accommodation. This is a significant increase on the proportion of 4% of new rough sleepers coming from asylum support accommodation in the second half of 2022/23. The growth in this group has had a significant impact on the overall total of people seen rough sleeping during the period, as well as on trends in demographics and other characteristics of the overall rough sleeping population. Further data with a break-down of nationalities, notably rough sleepers from SAP

countries (Afghanistan, Eritrea, Libya, Syria, Sudan, and Yemen) are included in [Appendix A](#). The numbers of Eritrean and Sudanese people experiencing rough sleeping in London, after leaving asylum accommodation were particularly high.

There is further evidence of a wider impact on homelessness, which goes beyond just those categorised as rough sleepers by the CHAIN database. London Councils regularly survey London boroughs for those supporting anyone coming from asylum accommodation services (“National Asylum Support Service (NASS)”) and found that 1087 refugees were made homeless in London after eviction from Home Office accommodation in January 2024. Furthermore, 311 of these people were left to sleep rough. This marks an increase of 234% compared to September 2023, when London Councils began undertaking this survey, which found 93 refugees sleeping on London’s streets.

The London Councils data captures those who experience hidden homelessness and who may not be captured on CHAIN data, which requires rough sleepers to be “bedded down.” The data also shows that when London’s Severe Weather Emergency Protocol (SWEP) was activated, in response to plummeting temperatures in January 2024, 242 (20%) of the 1,284 rough sleepers placed in emergency accommodation were refugees previously housed by the Home Office. SWEP is triggered when weather conditions pose a threat to life. The survey suggests the vast majority (over 90%) of those rough sleeping after leaving Home Office accommodation had received a positive asylum decision.

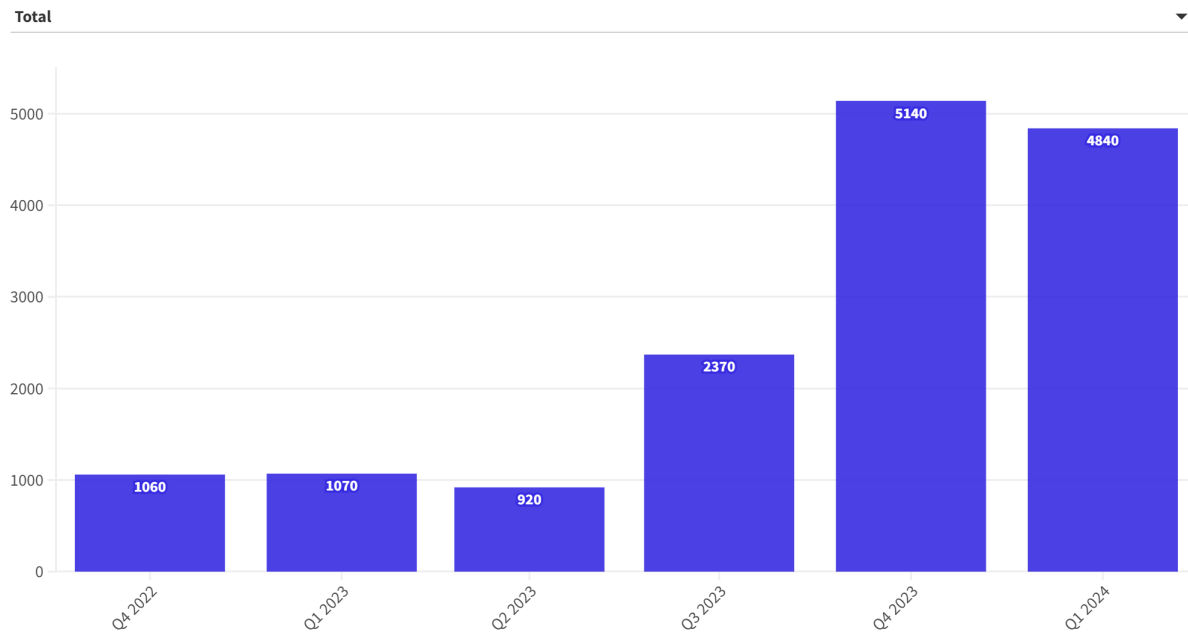
	Number of NASS-leavers who slept rough in London	Number of NASS-leavers presenting to homelessness services in London (Not necessarily rough sleeping)
September 2023	93	609
October 2023	112	846
November 2023	215	1,036
December 2023	<i>We do not hold December data due to initiatives like Crisis at Christmas which skews the figures for this month.</i>	
January 2024	311	1,087 ¹

During the same period, data published by the Ministry of Housing, Communities and Local Government (MHCLG) on statutory homeless saw a rapid up-tick in households owed homelessness relief duties after leaving Home Office accommodation across England.

¹ [Hundreds of refugees sleeping rough in London amid dramatic spike in homelessness, March 2024 | London Councils](#)

Households owed homelessness relief duties after leaving Home Office accommodation

Statutory homelessness data, per region and Local Authority in England



Source: [Statutory homelessness \(DLUHC\)](#)

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Recommendations

- Continue to coordinate with the London Strategic Migration Partnership, London Councils, local authorities, and voluntary and community sector on asylum decisions to ensure that local services can prepare for an increase in evictions for asylum accommodation.
- Recognise asylum accommodation as supported/ hostel accommodation given the use of shared facilities in asylum accommodation and people's average length of stay is usually greater than three months. This would mean refugees could access the Private Rented Sector (PRS) accommodation at the higher self-contained Local Housing Allowance (LHA) rate rather than being capped at the shared room rate. The shared room rate is unaffordable in the current PRS market in London; very few rooms are available and affordable at this lower rate.
- Invest in wraparound 'Move-On' support (see further detail in section 2).
- Recognise that mitigation will only go so far and invest in rough sleeping and homelessness services to be able to provide tailored multi-agency support to all those at risk of destitution.

It should be noted that:

- One of the recommendations of this review was for the Home Office to share disaggregated data in advance of decisions, showing which stage people are at in the asylum process (i.e., interview, decision, or discontinuation) to ensure that local services can prepare for an increase in evictions. We are pleased that the Home Office has now implemented this approach through their Place-Based Visibility Tool (PBVT) 3.
- Another recommendation of this review was for the Home Office to increase the 'Move-On' period from 28 days to 56 days in line with statutory homelessness duties under the

² [Households owed homelessness prevention and relief duties after leaving Home Office accommodation | Flourish](#)

Homelessness Reduction Act. We are pleased that that the Home Office is trialling this approach for the next six months.

1.2 Access to Immigration Advice

Data published in October 2023 based on analysis from Freedom of Information data on Immigration Legal Aid highlighted that at least 51% of asylum applicants in England and Wales, 37,450 people, are now unable to find a legal aid lawyer. That is the deficit between the number of new legal aid cases opened ('matters') and the number of new applications for asylum for the contract year 1 September 2022 to 31 August 2023. This compares with deficits of at least 25,000 people or around 43% in 2021-22 and 6,000 people in 2020-21.³

The SAP led to an urgent demand on services to support people to complete the survey response. The Office of the Immigration Services Commissioner (OISC) provided a position that while only regulated legal advisers working at Level 2 and above could provide asylum advice to claimants completing the Asylum Claim Questionnaire, colleagues working with claimants could offer assistance, even if they are not regulated legal advisers. This support covered barriers related to language issues and the technicalities of completing and submitting the forms. Requests for time extensions to complete the forms could also be made by an unregulated person, supporting the claimant.⁴

However, many organisations representing people seeking asylum highlighted the risks that a person seeking asylum would face significant challenges completing the questionnaire without legal representation and noted that it was essential that people who need it are able to access legal representation before being required to return the questionnaire back to the Home Office. The sector raised the very high risk that anyone attempting to assist someone to complete the questionnaire would stray into giving regulated advice (which is a criminal offence), noting that immigration advice is defined in statute in very broad terms and a discussion with an individual seeking asylum about what information is relevant to a question will almost always involve immigration advice.⁵

There is extensive research that cites the gulf between supply and demand for immigration advice in London.⁶ Addressing this would require a change in both the scope and fee structure of legal aid. However, it is also clear that legal aid capacity cannot be increased rapidly enough to address this in the short-term with many organisations being unable to recruit and retain qualified immigration advisers. In many cases the lack of access to legal aid has increased spending in other parts of government and public services; while locally commissioned advice services are an important part of advice provision this cannot and should not plug gaps left by the inadequate cover provided by the legal aid system. There is an opportunity to work with local authorities as funders of immigration advice to support pipeline funding, increase the quality of advice provision, address unique local needs, and support the long-term sustainability of the advice sector.

While many asylum claim decisions under the SAP were positive, a considerable number of asylum claims have also been withdrawn since the SAP was introduced. Asylum claims can be withdrawn for

³ [New Freedom of Information data indicates half of asylum applicants are unable to access legal aid representation - Refugee Law Initiative Blog \(sas.ac.uk\)](#)

⁴ [Streamlined asylum processing: OISC position. - GOV.UK \(www.gov.uk\)](#)

⁵ [Open Letter RE: Remedying the 'Asylum Questionnaire' \(ilpa.org.uk\)](#)

⁶ [A Huge Gulf: Demand and Supply for... | Paul Hamlyn Foundation \(phf.org.uk\)](#)

several reasons, including if the individual fails to maintain contact with the Home Office or fails to complete an Asylum Claim Questionnaire. If the individual is in asylum accommodation, this would end, leaving them at risk of homelessness and destitution and with an unregularized status. The individual would need to get their withdrawn asylum claim to be reinstated and are likely to require legal representation to request this.

In July 2023, the Home Secretary made changes to immigration rules which widened the circumstances that can lead to an asylum withdrawal, including failure to complete an asylum questionnaire. In [an inspection](#) led by the Independent Chief Inspector of Borders and Immigration (ICIBI), the Chief Inspector wrote:

“[...], I am concerned that the focus on clearing the legacy backlog ‘at all costs’ has led to perverse outcomes for claimants and staff. The number of claims that have been withdrawn and counted as ‘outcomes’ has soared – 22% of all decisions made since June 2022 were withdrawals, and, incredibly, only one underwent formal quality assurance. This is not acceptable. Routine quality assurance on interviews and decisions has also been sacrificed for increased productivity. This has the potential to add to the appeals queue because of poor-quality refusals, and to further prolong the length of time a claimant’s life is put on hold.”

Furthermore, as the Home Office continues to clear the backlog of asylum claims, it is anticipated that there will be an increase in negative decisions issued, as more decisions are made on asylum claims for people from countries with lower grant-rates. Homelessness interventions for people with a negative asylum decision or a withdrawn asylum claim will be different to the approach taken to support newly recognised refugees over the last year, as these individuals require immigration advice to appeal the decision or reinstate their claim. In addition to placing pressure on lawyers, this also puts pressure on the courts where decisions are necessary by the Tribunal.

Islington – Immigration Advice Pilot

The council have started a new LB Islington-funded pilot advice project (FTE 0.8) that provides advice to unrepresented asylum seekers in hotels. This project aims to mitigate the acute lack of legal aid solicitors by assisting clients in navigating the asylum system, preparing for interviews, submitting evidence, and advising on asylum claim withdrawals, refusals and removals/relocation (barge/barrack removals).

The project originated from Islington commissioning an advice service to best support people during the streamlined asylum process given issues around completing the questionnaires and the pace/scale of decisions. It has since evolved into a broader support offer for people facing refusal or withdrawals on their asylum claims.

Recommendations:

- Work to ensure that sufficient immigration advice is in place to support asylum processing.
- Explore the option to increase Home Office secondary asylum casework capacity to review withdrawals and asylum appeals to reduce pressure on the Courts and Tribunal.
- Consult on and address long-term challenges facing the legal aid sector with the aim to increase capacity and sustainability of advice provision to meet demand.

- Work with the London Strategic Migration Partnership to coordinate and invest in a long-term sustainability strategy to develop a healthy pipeline of immigration advice provision and a diverse supply chain, including training and retention.
- Reduce the pressure on legal aid capacity by reviewing the speed and complexity of asylum pathways and the efficacy of decisions being taken.
- Consider the implications of the adequacy of legal aid provision for the speed of decision-making across different localities.

1.3 Access to Information and Advice

Partners in London identified a series of concerns with questionnaires under the SAP, beyond those already outlined above, regarding many requiring qualified immigration advice. Firstly, there was concern that people impacted by SAP, including the most vulnerable, were at risk of failing to return the form in time within 20 working days, leading to a withdrawal of their claim, or that they may fill out the form in a way that undermines their claim to asylum. SAP questionnaires were only available in English and had to be completed in English. If available, a legal representative could complete the questionnaire on behalf of the claimant. The Home Office advice stated that claimants could ask for help from a friend who understands English and who may also explain the asylum process but noted that they must not provide immigration advice.

While the Government has already outlined that it is unlikely to replicate the SAP process, this feedback did highlight the importance of wider support services offered to people seeking asylum in supporting signposting, referrals to advice services, interpretation and translation, and access to a range of other services that supports the health, independence and integration of people seeking asylum.

Recommendations

- Any form of information requirements or questionnaires to Londoners seeking asylum should be made available in relevant community languages, along with accessible options for Londoners with disabilities, literacy needs, or health and mental health needs.
- Invest in models of support that ensure people seeking asylum have access to the right information, signposting, and coordination of local services.

2. Supporting Move-On and Integration

A positive asylum decision is an enormous change for an individual or family, and what should be a moment of celebration can easily become a crisis. Newly recognised refugees often have no savings, no bank account and limited digital access, partially because of not being allowed to work, while awaiting a decision on a claim. There is also a delay in receiving an initial Universal Credit payment, although Advance Payments can be applied for, however not always guaranteed.

In addition to the lessons learned directly from the Streamlined Asylum Process, there is more that must be done on to assist people seeking asylum to adjust from one reality of living, and set of support, to another. Some key points are outlined below.

2.1 Wrap-Around Support

There is significant learning which can be extracted from the approach the Home Office has taken in introducing Home Office Liaison Officers (HOLO) to support newly recognised refugees in pilot areas. The Home Office's own evaluation, as well as feedback shared by Brent and Hillingdon, where pilots have taken place, suggest that there were successes in providing wrap-around support to people and improvements in them accessing services in their boroughs.

A key element in this success is the 'Place-Based' nature of these pilots, whereby the HOLOs were providing support in person, and as such were able to assist people and resolve issues locally, with escalation routes into local authorities established if required. This shift in culture and investment in this resource has led to positive outcomes for people in those respective boroughs, where previously systems were felt to be disjointed. For example, HOLOs have been evidenced to provide a useful conduit for swift and efficient communication between people seeking asylum, charity workers, officers from the council, the Department of Work and Pensions (DWP) and accommodation providers.

We welcome that the Home Office is currently implementing the roll-out of a national programme of AMLOs (Asylum Move on Liaison Officers) off the back of the successes of pilots. We ask the Home Office to do such work in continued partnership, drawing from learnings from this Place-Based approach.

Similarly, improved data flows have been suggested to be an important outcome of the pilot schemes. For example, HOLOs were able to share early notice of people with positive decisions such that support could be established early on throughout the 'Move-On' process. This was helpful in accessing support such as Universal Credit, where the DWP were able to provide a faster resolution to cases.

A few local authorities also offer a 'Move-On' support service, in addition to meeting statutory duties, that can provide information, advice and referrals to a range of relevant services for residents receiving a decision on their application. This points to the need for investment in local authorities' in-house models of providing 'Move-On' support. In some areas, it has been argued that the HOLO model is not needed, as local authorities' already have established ways of working to provide support pre- and post-decision; however, resourcing and funding is needed to ensure their sustainability in the long-term.

For example, Lambeth set up a 'Move On' support, appointments booking system, with a simple online questionnaire filled in with help from hotel management or other support. There after, a case worker contacts the person back, within 5 days, to develop a support pathway as they make the transition. Lambeth Sanctuary Services also hold weekly engagement sessions with hotel guests.

Welcome Newham - Move On service

Newham's Move On support is delivered through a '**one stop shop**'. This originally supported Ukrainian refugees, but branched out after the team noted that many of the services provided (housing, employability) were very similar for people seeking asylum. The service offers support with:

- Help with GP registration
- Universal Credit queries
- Housing costs and child benefit queries
- School admissions support
- Homelessness support
- BRP guidance
- ESOL registration
- Job seeking assistance
- Affordability assessments for private rented sector (PRS) accommodation
- Tenancy sustainment support.

Results and lessons include:

- The importance of trusted spaces to host 'one stop shops' eg. Local libraries
- Setting expectations from the outset
- Support cross-departmentally to meet needs

Successful Collaboration: Bridges Outcomes Partnerships & Brent HOLO/ AMLO Service

The Bridges Outcomes Partnership and their delivery partners operate across Brent, Hackney and West London to deliver services designed to reduce rough sleeping for single newly recognised refugees. The intervention has four key components:

1. Face-to-face engagement with individuals to complete a housing and integration plan.
2. Support accessing accommodation
3. Integration support.
4. Sustainment of accommodation

The service is securing accommodation at above set targets, despite fewer-than-expected referrals.

The service is adapted to local operating context. Bridges Outcomes Partnership has identified a range of actions that need to occur for a person prior to, at the point of, and after a positive decision. The service delivery owner for each intervention may be different depending on the local context and the role of other partners locally.

In Brent, where the delivery partner is Crisis and where the funder is the London Borough of Brent, the HOLO pilot was a set up a few months after start of the service. There was considerable added value gained from collaboration between the two programmes.

Recommendations

- Continue to work with Hillingdon, Brent and Hounslow and other pilot areas to implement lessons and success from the HOLO Pilot programmes as the AMLO (Asylum Move On Liaison Officer) model is rolled out across all local authorities. (This engagement is currently 'live'.)
- Learn from local authority move-on support programmes. London Councils have been making the case that funding for local authorities to provide wrap-around services should be considered alongside the programme.
- Learn from the collaboration demonstrated in Brent in particular. Careful consideration should be made of what the most effective allocation of resource should be in the future across local authority and Home Office delivery in an ideal model.
- Consider providing wider housing support as part of a rolled out national programme, acknowledging that accommodation is key in ensuring the first step to integration. This should include an expansion of rough sleeping prevention programmes.
- Home Office should restart discussions with London Councils and GLA on improved data sharing with local authorities to support positive outcomes locally.

2.2 Integration

To support a long-term vision for this work, it is also necessary to consider wider strategies around welcome and social integration.

There are a variety of different definitions for ‘social integration’ and specific definitions for the integration of people seeking asylum. However, definitions tend to frame the concept as a two-way process, involving newcomers being able to function well, and becoming active and thriving members of their community; and hosts and institutions helping to welcome and support arrivals to settle and lay down roots in their new home. It should be noted that integration is distinct from the concept of forced ‘assimilation’ into a majority culture. Instead, integration requires responsive and equitable policy and services, and a shared sense of community and a respect for differences between people from diverse backgrounds.

The GLA has defined social integration as “the extent to which people positively interact and connect with others who are different to themselves. It is determined by the level of equality between people, the nature of their relationships, and their degree of participation in the communities in which they live.”⁷

The mayor’s work on social integration has four parts:

- Relationships – promoting shared experiences
- Participation – supporting Londoners to be active citizens
- Equality – tackling barriers and inequalities
- Evidence – improving London’s evidence base to measure, evaluate, and share findings on the state of social integration.’

Barnet: Understanding that people seeking asylum are 'long term residents'

Barnet has noted the advantages of framing their asylum strategy around a commitment to see people seeking asylum as ‘long term residents’ in the borough.

Results and lessons:

- This has helped the borough to design its services within a perspective of providing welcoming support over multiple years (rather than months), reflecting the experiences of many asylum-seeking residents impacted by the current backlog in application processing.
- The framing has also encouraged the borough to develop its strategy with a view to supporting residents to spend their lives in London once they receive refugee status, encouraging a focus on initiatives that help residents become active members of their local area, forming social connections in their community.

In the Asylum Welcome Design Labs funded by the Mayor, partners stressed that integration must begin on ‘day one’ for people seeking asylum – and that this will help with the move-on process. If someone can speak English, for example, they are far more likely to be able to navigate the processes required in the move-on process.

⁷ <https://www.london.gov.uk/programmes-strategies/communities-and-social-justice/social-integration#:~:text=All%20of%20us%3A%20The%20Mayor's%20strategy%20for%20social%20integration&text=It%20is%20the%20extent%20to,the%20nature%20of%20our%20relationships>

Several practical toolkits and information briefings are available to support the process of evaluating initiatives, measuring social integration, and tracking success towards objectives and key performance indicators:

- The [GLA Social Integration Measurement Toolkit](#)
- The Government's briefing pack on [Measuring Outcomes for Integrated Communities](#), which also includes a list of integration indicators and examples on how to collect data to track changes in this over time. Similarly, the [Home Office also provides a list of indicators of integration](#).
- The GLA's [Asylum Welcome Toolkit](#) provides examples and a guidance to support local work to develop welcome and integration strategies.

Lambeth - Borough of Sanctuary accreditation

Lambeth was awarded Borough of Sanctuary Status in 2022 and attributes the scheme as helping the borough to improve co-ordination and outcomes in its asylum and resettlement strategy.

Results and lessons:

- The process of participating in the scheme has enabled the borough to develop a [Borough of Sanctuary Strategy](#) from 2022-25.
- Their accreditation has also helped the borough secure consensus for a dedicated Sanctuary Services team.
- The scheme has supported the borough to establish a 'Sanctuary Board', comprising refugees, people seeking asylum and people with No Recourse to Public Funds (NRPF). The team consults the board to gather lived experiences on the needs of 'sanctuary seekers', using this data to design and implementing new initiatives that support and welcome new arrivals to successfully settle and become active in their local community.

Recommendations:

- Work with local authorities to establish an end-to-end asylum system that considers wider impact on public services, and integration outcomes for newly recognised refugees as key success factors.
- As savings are realised within the asylum estate, reinvest some of this funding back into communities to enable local authorities and voluntary sector organisations to implement and scale local integration strategies.
- Review asylum policies through the lens of integration and consider recommendations that improve asylum seekers' ability to learn English, participate in their communities and access decent work and quality housing.

2.3 Improved Data Sharing

Improved data sharing with local authorities would significantly help with the processes of integration and move-on.

The position of local authorities in London is that people seeking asylum and newly recognised refugees share a set of vulnerabilities, risks and barriers to services that mean a greater level of information sharing is required to ensure that local authorities can fulfil statutory duties (as well as deliver non-statutory, preventative services) than is required for the general public, and thus this data sharing is justifiable under GDPR. These additional vulnerabilities faced by people seeking asylum are a factor that increases the need for local authorities to intervene to support and safeguard these individuals, as part of the fulfilment of their statutory duties.

The vulnerability of people seeking asylum is explicitly recognised in government guidance, such as the Office for Health Disparities [Migrant Health guide and in the work of the Home Office Mental Health Team](#). This guide sets out that the below groups are considered vulnerable based on their potential health needs which are informed by experiences either before, during or after migration.

- Asylum seekers and refugees
- Unaccompanied children
- People who have been trafficked
- Undocumented migrants (those who are living in the UK with no legal status)

The Home Office has recognised the need for personal-level data sharing for asylum seekers in contingency hotels on safeguarding grounds. However, this personal-level data sharing is not being routinely shared with local authorities for people in dispersed accommodation.

There is a high rate of homelessness presentations and homelessness prevention duties owed among newly recognised refugees leaving Home Office accommodation, and this group lack resources that may prevent or delay homelessness for other groups (e.g. local connections, ability to access Universal Credit ahead of eviction). Proactive action is required to address this.

Recommendation

- Home Office should establish a Data Protection Impact Assessment and Data Sharing Agreement with statutory and civil society partners supporting people seeking asylum directly. This will ensure that appropriate information on individuals is shared with partners working to support individuals.

3. Closing Hotels

Should the backlog be cleared, this will inevitably lead to the closing of asylum contingency hotels.

The way in which hotels are closed can have a significant impact on any remaining accommodated asylum seekers who need to be moved to a new location, the services that are set up to support them including education providers, and the wider community. Coordinating with local authorities and local service providers around the closure of hotels is paramount.

Extensive detail has been provided by London boroughs to the Home Office for its lessons learned review on hotel closures, in addition to extensive commentary from London boroughs on Clearsprings' hotel closures Standard Operating Procedure. We have not yet had a response to this feedback. The below are some high-level recommendations from that work.

Recommendations

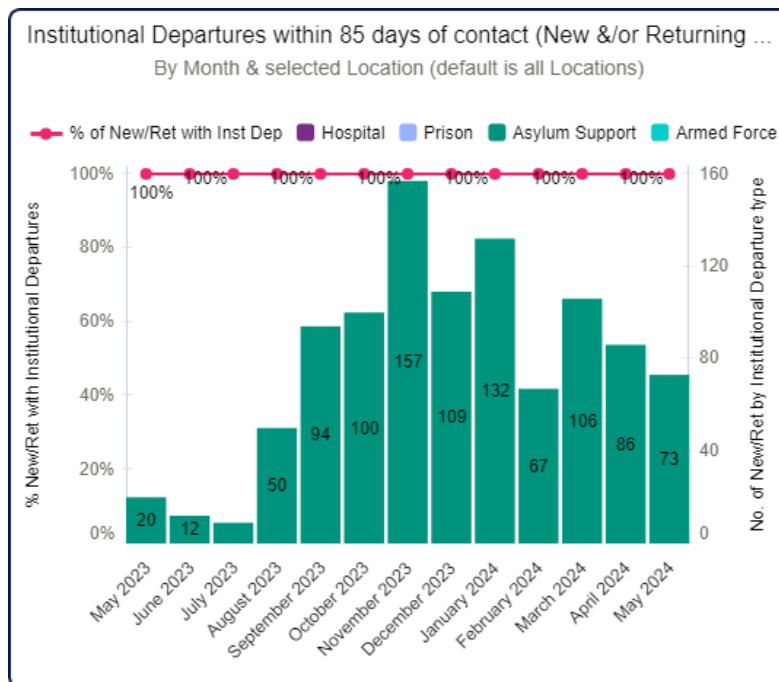
- Ensure early engagement with local authorities and secure data sharing with local authorities about vulnerable residents being moved to ensure that they are appropriately supported and there is continuity of care.
- Ensure adequate notice for residents and local authorities to ensure that support can be put in place, expectations managed, and people have time to prepare if they are moving accommodation. This should include capacity to undertake vulnerability assessments so that the needs of all vulnerable residents can be met.
- Prioritise engagement and direct communication to residents – ensuring consistency, transparency and clear expectation setting as early as possible.
- Engage with the Strategic Migration Partnerships to establish an overall strategy around hotel closure to minimise the impact on residents, reduce the pressure on local authorities and work within London's 'fair share' principles.

Appendix A

CHAIN institutional departures data – asylum support accommodation by nationality

These figures relate to people starting a new rough sleeping episode (new or returning rough sleepers) following departure from asylum support accommodation.

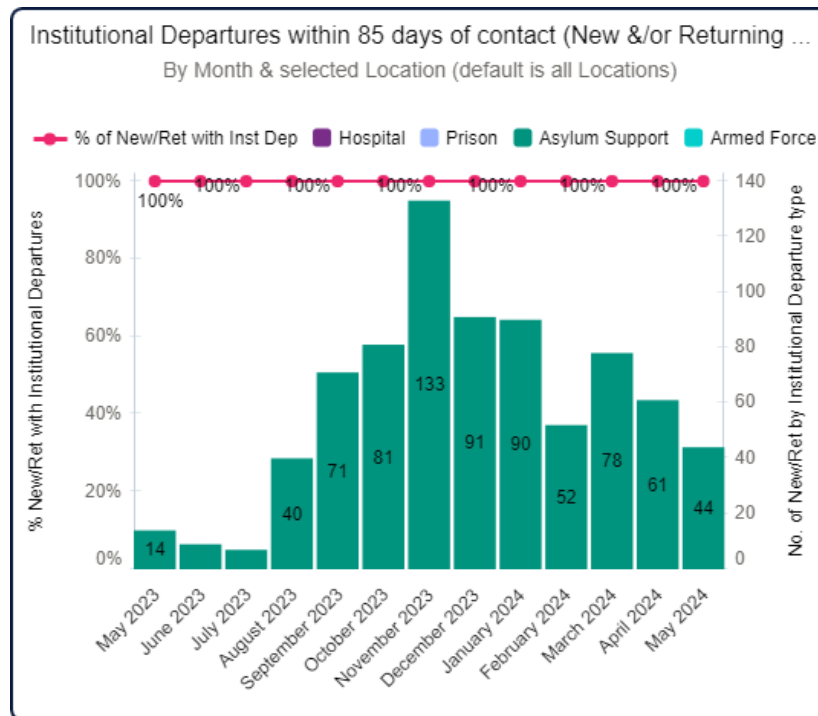
All nationalities:



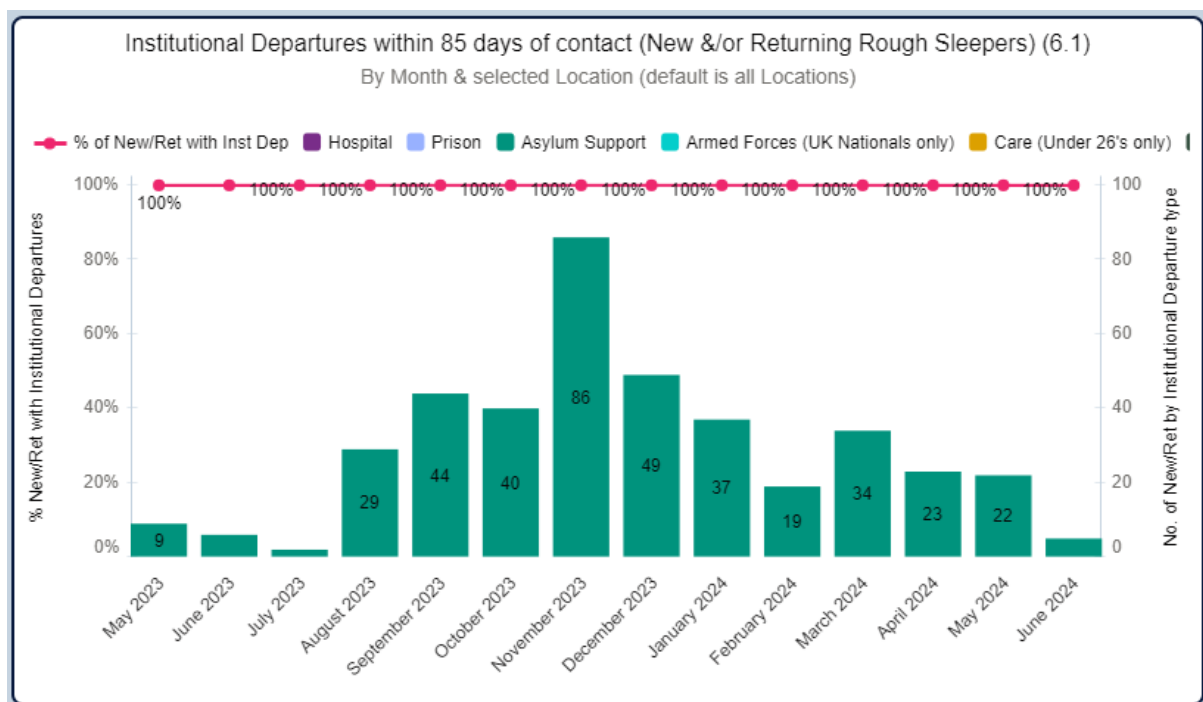
SAP countries (Afghanistan, Eritrea, Libya, Syria, Sudan, and Yemen):

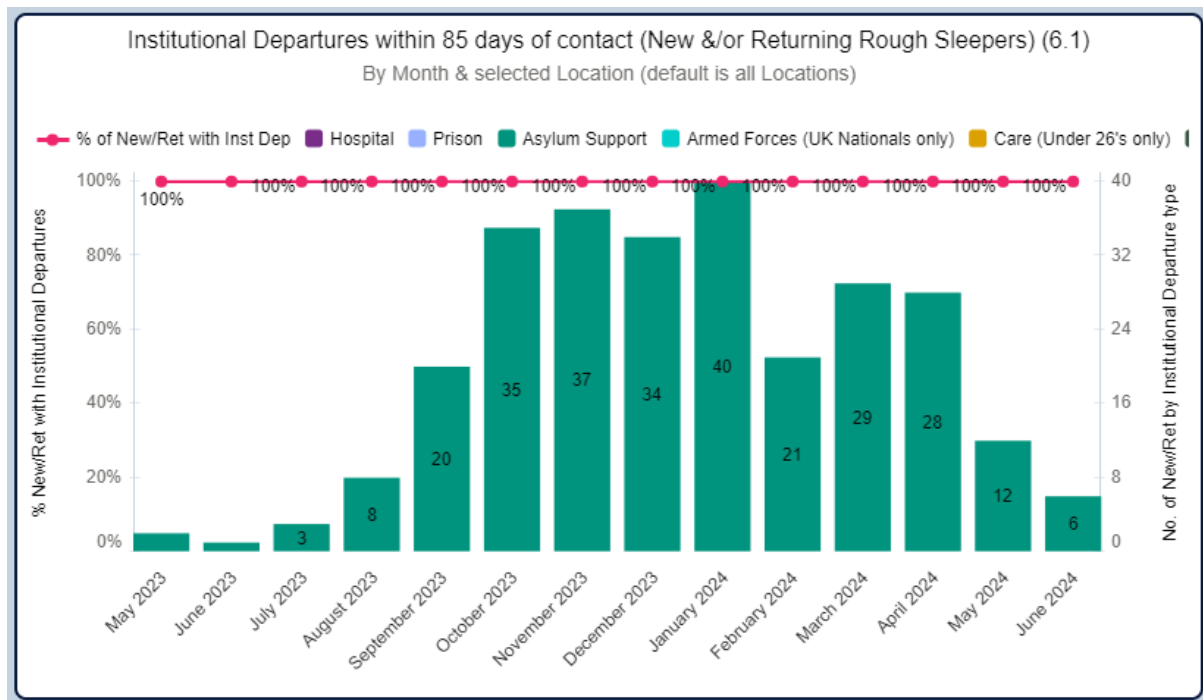
The numbers of Eritrean and Sudanese people (both included in the SAP nationalities) who experienced rough sleeping in London after leaving asylum accommodation were particularly high:

Eritrea:



Sudan:





Feb 2025