

Written evidence submitted by NACCOM (The No Accommodation Network) (COR0241)

[Note: This evidence has been redacted by the Committee. Text in square brackets has been inserted where text has been redacted.]

Background to NACCOM

NACCOM is [the No Accommodation Network](#), a UK wide network of 130+ member organisations and individuals working collectively to end destitution amongst people seeking asylum, people who are refugees and people who have no recourse to public funds (NRPF). Set up in 2006, it became a registered charity in 2015. NACCOM's staff team supports the network to increase capacity, become more sustainable and, through working with members and people with lived experience, evidence the impact of destitution and campaign for policy and practice change. Full Members are predominantly grass roots charitable organisations providing services including accommodation to people who would otherwise be street homeless. In 2019-20, our members accommodated 3,373 people, of whom 2,794 had NRPF (including people who have been refused asylum) or refugee status. An estimated 1,849 people had to be turned away from services due to lack of accommodation capacity in the same period, and around 2,710 people received financial assistance but were not accommodated.

Summary

In our submission we focus on 'Home Office preparedness' with regards to two areas; institutional accommodation and immigration and visas. The ongoing human costs of the hostile environment have been well documented, but the pandemic has highlighted the housing and health risks inherent within Home Office policy. We recognise the importance of the changes that were introduced in March 2020 to asylum support, which allowed people at the end of the asylum process to remain in accommodation with access to financial assistance. Our concern is that these were temporary changes, and when they were lifted, people became immediately at risk of homelessness. Whilst there is a pause in place currently, we would like further reassurance from the Home Office that people will not be evicted into homelessness from asylum accommodation during or after the pandemic. We also recognise the vital work of Local Authorities and charities across the UK in accommodating people regardless of immigration status under the 'Everyone In' directive in England (with equivalent initiatives in Scotland, Wales and Northern Ireland). However, we see the Home Office's refusal to suspend NRPF as a major barrier to people moving on from that support, and the lack of guidance and funding around this issue has meant that some people with NRPF have been forced to face homelessness and destitution in the midst of a deadly pandemic. More can and must be done to ensure that everyone is kept safe, and lessons must be learnt where positive steps have been taken so that no one has to experience homelessness after the pandemic.

In the section on **Institutional accommodation**, we focus on problems connected to the restarting of evictions from asylum accommodation during the pandemic. We share concerns about institutional accommodation sites and the impact that poor quality accommodation and lack of legal advice can have on people's asylum claims and health and wellbeing.

In the section on **Immigration and Visas**, we focus on the impact of NRPF policy on Local Authority provision during the pandemic, and concerns about the impact of changes to the immigration rules.

We share barriers that people in the immigration system face when it comes to accessing the vaccine.

Key recommendations to the Home Office:

- Publish an evaluation of the Positive Move On Support service offered by Reed in Partnership with Migrant Help in England to better understand its impact in preventing destitution, including (but not limited to) work undertaken during the pandemic.
- Ensure that everyone in asylum accommodation has free internet access and work with Department for Work and Pensions and sub-contracted AIRE providers to ensure everyone has access to online services to support with move on.
- Work with the Ministry of Housing, Communities and Local Government (MHCLG) to publish the evaluation of the Local Authority Asylum Support Liaison Officer (LAASLO) pilot.
- Extend the move on period to at least 56 days for people with a positive decision.
- Publish an evaluation of the impact that changes made during the period March-Aug 2020 had on people leaving the asylum system with a positive decision on their asylum claim.
- Maintain the pause on evictions for people with a negative asylum decision for as long as Covid-19 remains a threat. No-one should have their financial support or accommodation withdrawn until they have been able to access alternative provision. People in asylum accommodation must be provided with adequate advice and support to help them progress their legal case and make informed choices for their future.
- Actively engage with stakeholders to improve pathways for people at the end of the asylum process, publish an Equality Impact assessment and conduct an evidence review of the health impacts on people who do not leave the UK after the cessation 'notice to quit' period.
- Stop the use of barracks as a form of institutional accommodation and urgently commit to a public enquiry into the use of institutional accommodation.
- Provide safe, high quality accommodation for people in the asylum system in areas where legal advice, community support and healthcare is easily accessible. Ensure that the information people are receiving about their right to legal advice is accurate and up to date.
- Suspend No Recourse to Public Funds (NRPF) so everyone regardless of immigration status can get the support they need whilst Covid remains a threat.
- Work with MHCLG and relevant housing departments for constituent nations of the UK to provide adequate funding and clear guidance for local authorities, so they can fully support everyone at risk of homelessness in their communities.
- Reverse the rule changes so no one is punished for rough sleeping, and work with other government departments to improve access to free, independent legal advice and accommodation for all.

Section A: Institutional accommodation

1. Evictions for people who have recently been granted refugee status

1.1 The Home Office restarted evictions from asylum accommodation for people with a positive decision on the 11th August in England. We [voiced our concerns about the risks that such a decision would bring](#) based on [evidence that we gathered in 2018 and 2019](#) about the challenges people face in accessing housing after the 28 day move on period. In the short term, however several factors mitigated against some of these concerns for our members and people with refugee status that they

support. Firstly, at least for the first few weeks of the restarting of evictions, people who had been granted refugee status during the pause on cessations (March-Aug) were able to remain on asylum support until they had received their first payment of Universal Credit. Secondly, it was hoped that the 'phased' approach to cessations in different local authority areas, combined with consultation with those Local Authorities, would reduce risks of people experiencing homelessness.

1.2 Several months on, we are concerned that lessons have not been learnt and people who are newly recognised as refugees are facing eviction without access to benefits and housing. To date, the Home Office has not published any data on the demographics and pathways of people with a positive decision who have been sent cessation letters so far. This makes it impossible to ascertain whether a) steps taken in the first few weeks after the pause was lifted in August have prevented destitution amongst people with refugee status and b) if so, what changes can be maintained so no one is evicted into homelessness and financial hardship.

1.3 To try and understand the situation better, we undertook work with some member organisations to monitor the referrals they received for people with refugee status in the period September-December 2020. Data received to date from four organisations shows that 95 referrals for people with refugee status were recorded. Of these, 35 were for people who had recently been granted refugee status and had received eviction notices since August 2020. 74% of this cohort (26/35) were known to have their BRP card at the point of referral and 54% (19/35) were known to have Universal Credit arranged at the point of referral. We understood that after evictions recommenced, the AIRE provider (in England, Reed in Partnership) was contacting people to check progress with Universal Credit applications and to understand any relevant changes of circumstances. However, evidence from our members indicates that people could be facing eviction before receiving their first payment of Universal Credit.

Recommendation: The Home Office should publish an evaluation of the Positive Move On Support service offered by Reed in Partnership with Migrant Help in England to better understand its impact in preventing destitution, including (but not limited to) work undertaken during the pandemic.

1.4 The largest proportion of referrals for member organisations came from people self-referring (13/35). This shows the importance of people knowing which services are out there and being confident about approaching them, and conversely the risks and barriers that people may face if for instance they are digitally excluded. As services and support around housing, benefits, employment and education/training move online, the Home Office plays a crucial role in ensuring fair access to all.

Recommendation: The Home Office should ensure that everyone in asylum accommodation has free internet access to ensure that no one is digitally excluded. The Home Office should work with Department for Work and Pensions and sub-contracted AIRE providers to ensure everyone has access to online services to support with move on.

1.5 Within our data set, the next largest cohort of referrals for support (12/35) came from councils, with 3 referrals from Local Authority Asylum Support Liaison Officers (LAASLOs). It is our understanding that LAASLOs play a vital role in preventing homelessness amongst people at the end of the asylum process, yet the impact of this role cannot be fully understood (or developed) without an evaluation.

Recommendation: The Home Office and MHCLG should publish the evaluation of the LAASLO pilot as set out in [the Integrated Communities Strategy in Feb 2019](#) so that the benefits of the provision can be understood and if possible developed.

1.6 The human impact of the uncertainty and distress caused by the 28 day move on period is evidenced by the [testimony of Experts by Experience at the recent Housing Communities and Local Government \(HCLG\) Select Committee enquiry in December 2020](#). In this, Sam explained: *'I have been in touch with the local council. I made a homeless application. There is a delay in service due to the pandemic, because I only have 18 days to leave, because of the 28-day movement period for newly recognised refugees from asylum accommodation... I applied for universal credit three weeks ago. I still do not have an appointment for universal credit. In 18 days...I have to leave my accommodation. It is really difficult. As an asylum seeker, I was not allowed to work. I do not have savings. By the time you open a bank account and get universal credit, to try to find alternative accommodation is really difficult. I should be celebrating the fact that I have my leave to remain. I have been looking for a job; I have been doing job interviews. I should be focusing on that instead of doing homeless applications. This has been a problem with the 28 days, especially during the pandemic.'*

1.7 We support the calls of the [British Red Cross in their Feb 2020 report 'The Costs of Destitution'](#) and believe the move on period should be extended to at least 56 days. We are concerned that people newly recognised as refugees will continue to be at significant risk of homelessness if the move on period remains as it is. Multiple factors including limited or unaffordable housing stock, Local Authority funding cuts and the upcoming lifting of the rental sector evictions ban mean that the numbers of people facing homelessness could rise significantly in the months ahead. Alongside the role that MHCLG plays in resolving these issues more generally, it must be recognised that Home Office plays a crucial role in preventing homelessness for people with refugee status.

Recommendation: The move on period should be extended to at least 56 days.

Recommendation: To ensure learning from the pandemic is actioned, the Home Office should publish an evaluation of the impact that changes made during the period March-Aug 2020 had on people leaving the asylum system with a positive decision.

2. Evictions from asylum accommodation for people with a negative decision

2.1 We recognise the importance of the changes that were introduced in March 2020 to asylum support, which allowed people at the end of the asylum process to remain in accommodation with financial assistance. We understood from the outset that the process was going to be reviewed, but agreed with the recommendation of the HASC report on [Home Office preparedness for Covid \(July 2020\)](#) that *'Before taking any final decision to remove temporary support for asylum seekers, the Home Office and its accommodation providers must engage and consult closely with Public Health England, devolved governments, Strategic Migration Partnerships, asylum dispersal councils and local public health units to ensure that any changes do not place individuals at any risk or overwhelm other statutory support services.'* On the contrary, the decision to restart evictions for people with a negative decision was [announced on the 15th September](#) with 'immediate effect' and [without consultation with a number of key stakeholders](#).

2.2 We believe that destitution is never acceptable and particularly in the context of a deadly pandemic, it is of paramount importance that everyone has somewhere safe to stay. We were therefore extremely concerned by this decision. In conjunction with [over 225 organisations we wrote to the Prime Minister](#) calling for evictions to be stopped. Voices from parliament, Local Authorities such as [Glasgow](#) and [Leeds](#), [faith leaders](#) and [Metro Mayors](#) also conveyed their deep concerns. Our main concerns focus on two key areas, addressed below.

a. Immediate risks and lack of options for people facing eviction

2.3 There is widespread evidence that Covid-19 is [disproportionately impacting](#) on people from Black, Asian and minoritized groups [due to the intersection of risks that they face: higher levels of poverty, homelessness, insecure and exploitative employment, poorer health and health access](#). Our 2019-20 survey that 82% of people recorded as presenting at member services last year were identified as street homeless [file storage link removed]. The Home Office decision to restart evictions for people who do not have a route into mainstream housing, benefits and work shows a complete lack of regard for people's lives and wider public health measures.

2.4 People who are at the end of the asylum process need support and accommodation to access advice and identify their next steps. The impact on people's physical and mental health and wellbeing if they have nowhere to turn during a pandemic and no sense of certainty for their future is significant. Even as the pause has been reinstated, the lack of clarity about the situation has left people in a [state of confusion and turmoil](#).

2.5 Isabella (name changed), who is currently living in Leeds and came to the UK five years ago from the Caribbean, was receiving Section 4 support during the pandemic. She had begun the process of preparing for a fresh claim but this had not yet been submitted when evictions recommenced. She explains: *'On the 13th Oct I got a letter saying the Home Office was going to stop my support because I had nothing lodged with the Home Office. I explained that the solicitor was not able to lodge anything yet because the way that it worked to submit further submissions had changed in the pandemic. You couldn't go to Liverpool anymore in person to submit the claim, so the solicitor had to prepare the further submission and couldn't apply for support on those grounds until the submission had been lodged. I said I was happy to get my solicitor to write to the Home office to explain the reasons for the delay with my submission but they said it wasn't needed and they understood. Then on the 19th Oct I went shopping with a friend, and when I checked my balance I had no money. I called them and they said my support had been stopped. I appealed this twice but my appeal was turned down... I got a letter saying I had until the 11th November to leave the property. It was very difficult to get hold of anyone to ask what was going on... I was very frustrated. I had nowhere to go, no food in the house, because my support had been stopped... I was not coping well. I had no support networks because everything is shut. I had experienced a mental breakdown before, and this just added to it... Micro Rainbow helped me with another appeal and this time the Judge called for my support to be reinstated. This was at the end of November, by which point I had been without any support for over a month... I stayed in the same property the whole time. The welfare officer had come to tell me that if I didn't leave they would physically remove me from the property but I said I would take legal action if they did that because they didn't have the right to evict me... I was very worried. I don't know what I would have done if I had been evicted.'*

2.6 Alongside the human impact of restarting evictions, as a network of accommodation providers, we heard first-hand from members about the practical implications of not having enough bedspaces to meet need if and when evictions restarted in their area. In 2019-20, an estimated 1,849 people had to be turned away from our member services because of a lack of capacity [file storage link removed], a figure which we anticipate would be considerably higher now due to Covid. The reasons for this are outlined below:

- When evictions restarted, no government guidance was published on how and if **night shelters** could reopen safely. [Guidance now confirms that communal night shelters remain](#)

unsafe. At the time of writing, many shelters remain closed or have had to reconfigure their services which has resulted in fewer bedspaces being available.

- The various levels of Covid related restrictions in different parts of the country during September-November (before the pause was reinstated for people with a negative asylum decision) and concerns about the risks for households have significantly impacted the availability of **hosting schemes** (where volunteer households take in guests free of charge). To date, many report being unable to function at all, or are operating at a much smaller scale.
- **Housing schemes** report concerns about their number of bedspaces contrasting with the numbers they anticipate would be evicted in the local area, alongside difficulties with staff and volunteer capacity and challenges with securing funding to make services sustainable.
- Members have also reported concerns about **digital exclusion** and the risks of people not knowing about services or not being able to access online support. **There is concern that when evictions do restart, people may not know where to turn for help.**

2.7 The Boaz Trust, Manchester were amongst many members who conveyed concern about their capacity after evictions resumed: *'Covid-19 has meant we are able to offer less accommodation: we had to close our night shelter early (mid-March, rather than 1st May) and also will not be reopening it in October (2020). This provided 12 bed spaces for refused asylum seekers, and previous years we have accommodated over 65 individuals during the winter months. Many of these have been homeless due to delays in Asylum Support, or while waiting to make further submissions. Others have been destitute for a long time, and have then moved on to our longer term accommodation. Due to Covid-19, we have also had to pause our hosting scheme. It is difficult to predict the exact number of spaces this has impacted, but likely to be around 10 people we haven't been able to accommodate ... We have also seen a reduction in the number of referrals we are receiving, due to many of the referring partners being closed or running a limited service. We have started taking self referrals from people who contact us directly, but are concerned that some people are not aware of Boaz who may need accommodation. We are also seeing people move on less quickly from our shared housing, meaning we can accommodate less people overall.'*

Recommendation: The Home Office should maintain the pause on evictions from asylum accommodation for people with a negative asylum decision for as long as Covid-19 remains a threat. No-one should have their financial support or accommodation withdrawn until they have been able to access alternative provision. People in asylum accommodation must be provided with adequate advice and support to help them progress their legal case and make informed choices for their future.

b. Lack of consultation with relevant experts and stakeholders about the decision to restart evictions and assessment of its impact

2.8 The pandemic has highlighted the risks inherent within Home Office policies, particularly around health and housing, which create a system that leaves people destitute at the end of the asylum process. The Home Office can and must do more to ensure that people have the support they need to engage with the system and explore their options whilst having their basic needs met.

2.9 Despite wording to local councils (as seen in a Freedom of Information request) that factors such as 'significant rough sleeping pressures' would be considered in the process of resuming cessations, there is no public evidence that the Home Office considered the impact of the pandemic on emergency accommodation provision for this cohort of people. The Home Office has not published

an [equality impact assessment of the restarting of evictions](#), so it remains unclear what safeguards have been put in place to prevent destitution. Parliamentary questions have been asked on [public health consultation around the restarting of evictions for people with a negative asylum decision](#), but these have yielded little insight.

2. 10 We welcome the [High Court order](#) that led to the pause on evictions for people with a negative decision in November 2020. We see this as a fresh opportunity for the Home Office to engage in a meaningful way with experts (including all relevant public and voluntary sector agencies and people in the asylum process) and put people's rights and public health at the centre of any future approach.

Recommendation: The Home Office should actively engage with stakeholders to improve pathways for people at the end of the asylum process. The Home Office should publish an Equality Impact assessment on the decision to restart evictions and conduct an evidence review of the health impacts on people who do not leave the UK after the cessation 'notice to quit' period.

3. The use of Hotels and Barracks as institutional accommodation sites

3.1 We are very concerned by the long-term use of hotels to accommodate people in the asylum system and the introduction of barracks as part of the institutional accommodation estate. The impact on people's mental and physical wellbeing is clearly evidenced and urgent reform is needed.

Recommendation: The Home Office should [stop the use of barracks](#) as a form of institutional accommodation and urgently commit to a public enquiry into the use of institutional accommodation.

3.2 In October 2020, the Home Office commissioned a review into the health and safety of hotels and barracks via a private risk management company, Human Applications. Alongside partner agencies, we were concerned about this review and drafted a template letter outlining key concerns and calls which we encouraged our members to send to their MPs. The findings have to date not been made public and this makes it very difficult to know what learning, if any, is being taken from the review.

Recommendation: See Appendix A for the letter which includes a full list of recommendations.

3.3 We have concerns about the length of time that people are being kept on Section 98 support. We have heard from people who have been on this support for several months with no idea when this will change and in some cases with limited or no access to justice. Furthermore, when it comes to accessing the vaccine there could be a particular risk facing people in institutional accommodation, due to the temporary nature of the provision and in some cases distance from healthcare services.

Recommendation: The Home Office should provide safe, high quality accommodation for people in the asylum system in areas where legal advice, community support and healthcare is easily accessible. The Home Office and sub-contracted providers must ensure that the information people are receiving about their right to legal advice is accurate and up to date so everyone has access to justice.

Section B: Immigration and visas

1. Local Authority provision for people with NRPF

1.1 The 'Everyone In' directive from MHCLG to Local Authorities across England to accommodate people regardless of immigration status, and equivalent schemes in Scotland, Northern Ireland and Wales, undoubtedly saved many lives. Yet by refusing to suspend NRPF, we believe the Home Office has not helped such efforts. On the contrary, its approach has contributed to delays and confusion and resulted in people being left street homeless during the pandemic. Issues identified by members of our network and people with lived experience include:

a. The failure by the Home Office to lift NRPF conditions is limiting people's move on options and causing problems at a systemic and personal level.

1.2 Nearly one year on from the first 'Everyone In' directive, the difficulties that Local Authorities are facing when it comes to moving people on from emergency accommodation are clear. [Crisis conducted research last autumn which identified NRPF as a key issue for many Local Authorities](#). Figures published by the [National Audit Office recently show that around 2,000 people \(half of the total\) who remained in emergency accommodation at the end of September 2020 were ineligible for benefits](#). As demonstrated in the recent oral submissions for the [HCLG committee enquiry](#), Home Office policy is clearly central to the prevention of homelessness amongst people with NRPF.

1.3 Abeo (name changed), an Expert by Experience [who testified to the HCLG committee in December 2020](#) about the impact of being homeless in the pandemic with NRPF said; *'When the council accommodated me, they only gave me temporary accommodation, and they have been telling me that if I do not sort out my housing benefit, I am going to lose my accommodation, because I have no recourse to public funds... I have been homeless for the last two years. It is very hard to comply when you are not allowed to work or claim benefits...it is against human rights as well. It is like the Government telling you, "Just sit on the street. You are not allowed to eat... just sit on the street and die". It is very difficult.'*

Recommendation: The Home Office should suspend No Recourse to Public Funds (NRPF) so everyone, regardless of immigration status, can get the support they need whilst Covid remains a threat.

b. The lack of clear guidance and funding means that Local Authorities are not all offering the same support to people with NRPF.

1.4 Our understanding is that accommodation and support for people with NRPF who would otherwise not be eligible varies significantly across different councils. Through partnerships with the voluntary sector and utilising of the Next Steps Accommodation Programme, we know some councils are funding (either directly or indirectly) accommodation and legal advice for people with NRPF who would otherwise fall outside the remit of provision. Another example is that of the Greater Manchester Combined Authority and [the Greater Manchester Mayor's Charity](#) which funds 'A Bed Every Night' inclusive of bedspaces for people with NRPF. Whilst such schemes and programmes can demonstrate the ways in which provision can work for those in need regardless of immigration status, we know the picture looks very different in other areas. Evidence from the [University of Wolverhampton](#) published in August 2020 shows how differing approaches across LAs have created a postcode lottery for people with NRPF. We are deeply concerned that people could be without support at a time when they need it most. Without face to face services and with the reduced

capacity in many voluntary services, there has to be continuity in what councils are being instructed to do and adequate funding to action this.

Recommendation: The Home Office should work with MHCLG and relevant housing departments for constituent nations of the UK to provide adequate funding and clear guidance for local authorities, so they are able to fully support everyone at risk of homelessness in their communities.

c. The changes to the Immigration Rules in December 2020 could make it harder for people with NRPF to get the support they need and make informed choices for the future.

1.5 In December 2020, the Home Office changed [the Immigration rules so that rough sleeping could be a reason for removal](#). We joined with [Crisis](#) and the [Mayor of London](#) to express our concerns about the changes and ask the Home Office to reconsider them. We maintain that no one should be punished for rough sleeping and believe the rule changes could push people into exploitative and dangerous situations to survive. People who have NRPF due to insecure immigration status should be supported to access independent legal advice to review their immigration needs and where possible resolve their case, and they should have access to accommodation whilst they do so. The Home Office should not make people pay the price for the lack of legally aided advice and lack of emergency accommodation.

1.6 Even before the rule changes, there were concerns about the risks facing people who have experienced trafficking in the pandemic many of whom will have NRPF. We joined calls in [October to urge the government to ensure that 'victims of trafficking do not face punitive immigration control measures if they come forward for support'](#) and in a separate joint letter in December, joined with others to express concerns that [the Immigration rule changes could increase risks for people who are confirmed and potential victims of modern slavery](#).

Recommendation: The Home Office should reverse the rule changes so no one is punished for rough sleeping. The Home Office should work with other government departments to improve access to free, independent legal advice and accommodation for all.

2. Vaccinations

2.1 It is crucial that people in the immigration system can access the vaccine in a timely way without fear, and we recognise the vital role that [both the voluntary sector and public bodies](#) play in developing strategies that address health inequalities. To begin, this work requires recognition that many inequalities exist because of hostile policies that need to be dismantled. On access to the vaccine, we recently consulted our members about their key concerns which included:

- Information being shared with the Home Office due to the Hostile Environment.
- People not being registered with a GP. This could happen if they move onto asylum support, or a different kind of asylum support, or leave the area to find alternative accommodation. People may not have an NHS number which can create additional barriers with healthcare.
- Information about the vaccine not being available in people's languages (or in a way that is accessible to all) resulting in people not knowing about or not trusting the vaccine.
- People not being able to access healthcare due to digital exclusion, lack of face to face services and lack of funds to travel (especially if people are located at distance from health services).

(COR0241)

We support the [Hands Up For Our Health campaign](#) call to suspend NHS charging during Covid and the recommendations of [Patients not Passports](#) to end data sharing between the Home Office and the NHS.

Conclusion

2.2 Destitution is not inevitable. It is a consequence of inhumane policy that sits at cross purposes with other government departments in their efforts to reduce homelessness, poverty, inequality and health emergencies. This approach must change if lessons are to be learnt and lasting reform implemented. The consequences of not doing this are extremely grave.

2.3 Since March 2020, local communities, devolved nations, Local Authorities and other government departments have shown that alternative action can save lives.

2.4 The recommendations outlined above outline some of the ways that the Home Office can be held to account and we look forward to working with the HASC to bring about policy changes that build back better for everyone.

February 2021

APPENDIX A

Template letter for people send to MPs drafted and shared by Refugees for Justice, NACCOM, Bristol Refugee Rights and Humans for Rights Network (Oct 2020)

To [insert name of MP)

I am writing to you on behalf of [name of organisation], [description of organisation and location i.e. if in constituency]

We are writing regarding the fact that the Home Office has commissioned a private company, Human Applications, to conduct a rapid review of Initial Accommodation for asylum seekers, including hotels and former military barracks. We are deeply concerned about this review, the way it is being conducted and its impact on asylum seekers. Significantly, we understand this report and its findings will not be published. It only covers a fraction of the 92 hotels and barracks and has a very short timeframe of less than two weeks.

The use of institutional accommodations to house vulnerable asylum seekers during COVID-19 pandemic has dramatically increased and although it can be explained to some extent by the current crisis; the way it is being managed remains deeply concerning. People are living in high risk conditions, with no access financial support, limited access to healthcare, legal advice, and mainstream services. In many cities people are being exposed to hate crime and racist attacks by the far-right groups and individuals and in many cases the risk of Covid transmission is high due to lack of sanitary conditions and social distancing.

People who seek asylum are already exposed to multiple risk factors that significantly limit their ability to protect themselves and those around them from the risk of contracting and spreading the virus.¹ The negative physical and psychological impact of accommodating vulnerable asylum seekers

in crowded institutional accommodations on individuals, and its consequences for local communities are clear by this point.

In Scotland, this institutional accommodation has led to a national tragedy. In less than two months, two people died in hotels in Glasgow, with six people including a police officer injured, and hundreds of others suffered irreparable harm. The level of harm that this practice imposes on individuals and communities is abundantly clear and we are deeply concerned about further preventable tragedies occurring.²

[Insert location specific information here i.e. in Bristol, in Birmingham etc.]

Despite the wealth of evidence, the Home Office and its private accommodation contractors have repeatedly denied the scope of the problems and refused to instigate any meaningful, independent, and publicly transparent process to identify and address these issues. In Scotland, the Home Office and Mears have both conducted similarly opaque and constrained internal reviews, with the Home Office review carried out by its own Head of Operations, Heather Laing. These reviews were carried out without civil society organisational input and without informing and involving the immigration solicitors of those interviewed. Glasgow MPs were forced to walk out of their meeting with Heather Laing in protest at the way the Home Office was operating its review.³

We are deeply concerned that this current review, rather than providing any meaningful and constructive reflection and solution mechanisms, will be used as an attempt to justify the continued use of hotels and military barracks.

Our recommendations are:

- The Human Applications review be published in a timely manner.
- The use of institutional accommodation, and the experience of people who seek asylum to be thoroughly investigated in a publicly transparent and independent manner; for lessons to be learned and for measures to be put in place to prevent further tragedies.
- To do this, the Home Office should commit to an independent and public inquiry chaired by an independent chair, co-designed with, civil society organisations, and most importantly with people who are directly affected.
- The data collection and analysis to be commissioned and conducted confidentially by an independent and trusted civil society organisation
- An inquiry report to be written and publicly disseminated by the independent chair in conjunction with civil society organisations and the Home Office.
- All information and data to be protected as confidential, and to be anonymised before it is handed over to the Home Office.
- All participants to be given access to legal advice and representation throughout the process. Legal representatives of all participants, most crucially immigration solicitors, must to be informed and involved in the process.

¹ [COVID-19 Impact Assessment Framework; risks and responses for people in the UK immigration system](#)

² <https://www.theguardian.com/uk-news/2020/oct/18/from-sudan-to-the-park-inn-the-tragic-story-of-a-migrants-killing>

³ <https://www.heraldscotland.com/news/18668674.snp-mps-quit-home-office-talks-botched-asylum-review/>

(COR0241)

I would be very grateful if you could write to the Home Secretary and/or raise the issue as an Urgent Question in Parliament so that these concerns and recommendations can be heard at the highest level. Please contact me if you have any questions or would like to discuss the matter further.

Signed

NAME [*name of organisation*], ADDRESS, POSTCODE