Written evidence submitted by Alexandra Ankrah (WCS0027)

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

Background:

1. I am providing this statement of evidence in a personal capacity, at the request of the Chair of the Home Affairs Select Committee (HASC) and as a former employee of the Home Office. I worked within what would become the Windrush Policy Team (Borders, Immigration and Citizenship), from March 2019, until May 2020; I left the Home Office at the end of July 2020. I was originally invited to take up the appointment as Head of Windrush Compensation Policy, by Mr Daniel Hobbs, having gone through a competitive process to join the Home Office in a policy role.

2. I was not line managed by Daniel Hobbs; I was initially managed by a Deputy Director. On my initial appointment the diversity of the team, based on race and/or ethnicity, appeared to reflect the poor diversity of the Home Office. With all policy roles, save for mine, filled by White staff. Black staff were either in temporary roles, or in transition and/or planning to leave. Asian staff had either come into the wider team on temporary promotion or had come into the team on substantive promotion. The Civil Service has very few Black people in Senior Civil Service roles (around 70 people), with no actual increase in the representation of Black people in senior roles in the last decade. The Home Office has a poor record on race and despite the judgement of the Supreme Court[1], has struggled to deliver better practice or outcomes.

3. On leaving the Windrush Team and prior to leaving the Home Office, I was fortunate to have worked in the Home Office's Crime, Policing and Fire Group (CPFG). In CPFG (and in sharp contrast) I observed the Home Office at its best. There was good leadership and despite the agenda being both complex and politically sensitive, close regard to excellence in policy making and inclusive approaches and engaging with communities.

4. Before I left the Windrush team, I set out my reasons for leaving, these included dissatisfaction with the handling of the Windrush Compensation Scheme by the Senior Civil Service leadership. Clear evidence of racism within the Civil Service staff and a toxic working environment that demonstrated an absence of genuine empathy and lack of focus on righting the wrongs. I also stated my concern that undue focus was being placed on using so called 'engagement', to create the illusion of intent rather than deliver outcomes, impact and deliver the Home Secretary and Government's ambition. The Windrush Compensation Scheme is not-fit-for purpose as set **by this government** and nor is it likely to become so.

[1] Essop and v Home Office (UK Border Agency), Naeem v Secretary of State for Justice [2017] UKSC 27

5. **This submission to the HASC will restrict itself to responding to the questions posed in the call for evidence that deal with:**

    A. Fairness of the Windrush Compensation Scheme.
    B. Adequacy of the levels of compensation offered or paid
    C. The sharing of information on the Scheme
    D. Ease of use of the scheme application forms and the accompanying guidance.

    The changes that could make the Windrush Compensation Scheme work better for those affected by the Windrush scandal? Based on my responses to the themes above, I have set out a **Summary of Changes** at paragraph 10 below

Introduction:

6. My conclusion, from having been involved in the Scheme since its launch in the Spring of 2019 is that it is inherently unfair and flawed by design. It is being delivered by Senior Officials who in the main lack the necessary skills, training and cultural sensitivity. It is largely inaccessible and difficult to navigate for those who are intended to benefit from the Scheme.

7. It is a product of a Directorate of the Home Office that has deep and systemic cultural issues, that in responding to previous reviews has shown itself deeply resistant to change. The Scheme is in some respects non-compliant with the Public Sector Equality Duty and I saw and flagged clear breaches of the Equality Act 2010.

8. I concluded it would be better to use a Machinery of Government Change to transition the scheme to another government department. I believe that another government department, with a focus on cross-government working and regulation, would be better able to use its existing procurement framework to swiftly set-up a partnership model involving: community actors and/or people directly affected, proven private expertise and government.

9. With governance through an independent panel(s) convened on behalf of the Prime Minister by the Cabinet Office, charged with providing oversight around complex cases. This oversight would extend to particularly high- claim value or cases which include claimants with a history of criminal offending.

10. The Scheme never really kept sight of the Home Secretary's statutory obligations under the Equality Act 2010, particularly the duty to foster good relations between those who share a protected characteristic and those who do not. Recent 'leaked' announcements, knee jerk changes to the guidance without engaging the communities, together with a narrative of generosity, do not appear to have taken into consideration the potential for a backlash.

11. Those responsible for the Windrush Scheme have done too little to develop a strategy to foster better relations across all our communities in the light of the Hostile Environment Scandal. They have instead succeeded in damaging the idea of what the name Windrush should mean today. The continued use of hand-selected Black 'representatives' of the community, who are in the main

either: supporters, members or donors of the Conservative party, as proxies for victims of the Hostile Environment Scandal, is partisan and morally reprehensible. The Home Office has eroded public trust and confidence.

Summary of change now required.

12. Based on my experience, I have set out areas for change in my response **below at paragraph 13 onwards**. In summary the changes required to improve the existing Scheme, aside from taking it out of the control of the Home Office, include:

- **Changing the name** of the Windrush Compensation Scheme, to reflect that it is a discretionary ex-gratia scheme, which is not independent.
- **Improve governance** and reinstate independent oversight
- **Make provision to repay claimants all historic legal costs reasonably incurred together with interest at 8%.**
- **Plain English guidance**, together with information in Easy Read and in formats that would assist those who are elderly and/or living with a disability.
- Offering support to claimants to take **impartial legal and expert medical advice** to submit a claim.
- Improving the handling of claims made by close family members on behalf of **claimants who have died.**
- Provide access to culturally **sensitive counselling services**
- Review the policy and process for **apologies, including the timing.**

Response:

A. <u>Is the Home Office managing to "right the wrongs" experienced by the Windrush generation through this Compensation Scheme?</u> Is the Windrush Compensation Scheme is fair?

13. The Scheme was set up at the direction of government, with I believe a real ambition to be fair and effective in righting the wrongs. The ambition of the Independent Adviser Martin Forde QC was to deliver a simple process with a humane and objective assessment that delivered financial support to people who had suffered harm and loss. Mr. Forde spoke about wanting to make sure the system was quick, but had the right checks in place to give the wider public assurance that public money went to people who had wrongly suffered as a result of the Hostile Environment.

14. Though Mr. Forde recognised and backed the need for individual apologies as part of righting the wrongs. However, perhaps because of his legal background, less regard was paid to the importance of truth and reconciliation. However, the opportunity to underpin the Scheme with a commitment to cultural change or restorative practice was missed on several occasions, because the senior leadership felt they should wait for the outcome of Lessons Learned Review and not pre-empt the findings of Wendy William's work. The Scheme was created and implemented in the 'image' of medical negligence claims management before the introduction of the statutory Duty of Candour now placed on the NHS. The ability to right wrongs

is hampered, if the starting point and a key cornerstone of the Scheme is no admission of liability:

> *"Payment of compensation under the Scheme does not reflect an acceptance on the part of the Home Office of any legal liability for the losses in respect of which the compensation is being paid".*[2]

The use of the term 'compensation' is misleading:

15. The Scheme is a discretionary scheme, it is therefore unfair to mislead people by describing it as a compensation scheme. This has misled claimants and the wider public into thinking that the Scheme could and would put people back into the position they would have been in, but for the Hostile Environment Scandal. The Scheme uses quasi-judicial language & works with Home Office legal advisers (HOLA) who are more familiar with statutory immigration rules and suffer at their inability to recognise the Scheme Rules are discretionary and intended to enable people. A major problem has become the lack of competency of HOLA in the understanding and practice of law beyond defending any change to immigration rules. This means their problem solving and understanding of equality and human rights-based approaches does no service to claimants. The reluctance of HOLA to seek independent advice, or work in a meaningful way with Martin Forde QC (a non-immigration lawyer) allowed the culture of the Hostile Environment to pervade the Scheme and undermine delivery.

16. Though the Scheme is <u>not</u> a Compensation Scheme, it is an ex- Gratia Scheme and being fair means explaining this difference to people. It is also important people understand that the Home Office in making payments will not acknowledge liability. It is also not a statutory scheme, it is a voluntary scheme, which has a set of rules that can and have been changed without consultation and sometimes with unintended consequences. This is also unfair because it means people remain at the whim of Officials.

17. The qualities of what a voluntary scheme/ex -gratia scheme is, are laid bare when contrasted with the Home Office's existing scheme **Ex-Gratia** Payments: Financial Redress Guidance (published February 2019). This clearly and differentiates, in a transparent way, between an ex-gratia scheme and compensation.

18. Using the word 'must' the guidance suggests compensation would require some level of judicial oversight. It also as set out below makes it clear the payment is at the discretion of the Home Office.

1.1.1 An 'ex-gratia payment is a sum of money paid when there is no obligation or liability

[2] The Windrush Compensation Rules published in April 2019, updated in June 2019 and republished in December 2020 continue to include a no admission of liability statement.

to pay it. ('Compensation' payments must be awarded by a court). Immigration
Enforcement, UK Visas & Immigration and Border Force make ex-gratia payments to
customers, beyond any legal or statutory requirements, as redress for maladministration.
These payments are made at the discretion of the Home Office and depend on the
individual circumstances of each complaint.

19. **Proposed change:** Changing the name of the Windrush Compensation Scheme, as this is a misnomer – this is a voluntary ex-gratia scheme with no quasi-judicial oversight. The position of the Independent Adviser is not and will not be a regulated public appointment. The change of name will have a dual effect:
    i. Provide clarity on governance, scope and so manage public expectations.
    ii. Increase public awareness that the Scheme is intended to be used by people who because of the Hostile Environment and the actions (or failure to take action) by the Home Office, they wrongly suffered: loss, hurt or harm, regardless of all backgrounds, ages and heritage – either as a primary claimant, on behalf of someone who has now died, or as close family members.

Improve governance and independent oversight

20. The Scheme must be seen to be fair. There has been a lack of transparency despite the published Windrush Compensation Scheme Rules in April 2019, setting out a commitment to the appointment of a role that would provide independent oversight of the operation of the Scheme. In April 2019, the Rules gave public assurance and explicitly stated the new role, would be unlike Martin Forde QC's role – which had been focussed on design of the scheme. It was stated the new independent role would include a focus on audit and assurance of the Scheme. I understand the Rules have now been re-drafted to either remove this function from the role or create ambiguity as to the scope of the role. This appointment sits outside of the rules relating to regulated public appointments and is in the gift of the Home Secretary. It is distinct and separate from the independent review process, which is a function carried out by the Office of the Adjudicator, based in HMRC.

21. I was charged with setting out advice, which was accepted on: future secretariat support, induction, a role description, and a milestones plan. In written advice, I also recommended using provisions within the Equality Act 2020, to actively promote diversity and inclusion. This included using a statement on the underrepresentation of Black, Asian and some ethnic minority groups in public appointments and stating that applications from Black and Asian qualified candidates were particularly encouraged. This was initially met with resistance on the basis it was felt the statement on underrepresentation did not apply to the Home Office. I provided supporting

evidence from the Cabinet Office's annual report that with regard to Public Appointments Black and Asian people remained underrepresented. My advice was still met with resistance.

22. There followed a hiatus, as Senior Officials sought to 'second guess' the Home Secretary and whether she would want to continue with Martin Forde QC's appointment. I provided advice to Senior Officials that a fair and open recruitment process was imperative because:

- The Home Office was involved in a Judicial Review, relating to the appointment of Lord Carlisle to Prevent and it seemed this was a time to demonstrate best practice.

- In the light of the impending JR, it was right to draw parallels with the Lord Carlisle case, as Martin Forde QC had styled himself as the architect of the Scheme. Had on numerous occasions defended it to community groups, particularly with regard re-stating legal advice was not needed to make a claim and the process was open and accessible. In the previous summer (on or around June 2019) he had given an interview in the Voice Newspaper, where he appeared to advocate Black lawyers should offer victims pro-bono legal help. He would later tell me he had been misquoted – but the damage was done.

23. The Home Secretary reconfirmed that she had wanted an open and fair recruitment process and of course Martin Forde QC remained welcome to apply,*** He was quite clear that he felt he was not being shown information, his only means of raising issues was reactively, when community members and lawyers raised concerns and complaints. I did not appear to be seeking to apply.

24. I had already undertaken background work on the appointment, including contact with Lord Simon Wooley, to arrange a meeting and consider how Operation Black Vote, might assist by encouraging applications from its stakeholders. OBV has a consistent commitment to taking a cross-party approach to developing and widening participation in democracy by Black ad ethnic minority peoples. I had also prepared a strategy-on-a-page for ensuring maximum impact in promoting the role. I sought agreement with the Deputy Director to a meeting with Lord Woolley, which she agreed to. The Deputy Director did not follow through on this meeting and re-buffed a later attempt to involve OBV or other community groups in disseminating information on the role. Much later the Deputy Director would ask me to re-convene a meeting with Lord Woolley, because it had come to her attention that he was working with the PM's Special Adviser on Social Justice on matters pertaining to Windrush and she had not been invited to a key meeting at No.10. The Deputy Director's focus was on securing attendance at the meeting.

25. I would later be told at my end of year performance review, that my performance was being down graded because of my work on the appointment

of the independent adviser. I was told that had failed to understand what the needs of the business (Home Office) were. At no time had I caused or contributed to the delay to the appointment, I followed all instructions around removing the audit and assurance functions from the job role and put forward revisions to the Rules. I had understood that my work, which had been in support of the Home Secretary's request for a fair and open process, had irritated both my line manager and the Deputy Director.

Access to legal and expert medical advice:

26. Given the lack of real independent oversight of the Scheme and in the interest of fairness the Home Office should fund independent advice. In the interest of fairness, the Home Office should ensure parity with the government's Diffuse Mesothelioma Payment Scheme, which pays each claimant up to £7,000 towards their legal costs. By providing support with legal costs those bringing a claim would be put in position that is more equitable.

27. At the point of offering of an award, claimants should also be offered access to independent advice. This would allow claimants to fully satisfy themselves that the offer is right for them and they have been given a fair offer.

28. The Scheme Rules originally afforded two opportunities to seek medical expert advice and input. This was either by the Home Office appointing a medical expert, or at the point of the independent review. This has now been reduced to two opportunities and the power of the Independent Reviewer has been curtailed. There was no consultation or equality impact undertaken on these changes. These changes make the Scheme less fair, because they have an adverse and disproportionate impact on Black claimants who would be reliant to medical evidence to demonstrate **impact on life**. It is unfair on people who come from communities who are either less likely to seek medical help for mental health condition and/or are less likely to be referred by GP's for support for some mental health conditions including reactive depression, post-traumatic stress disorder etc. Alternatively, this impacts negatively on claimants, because the Hostile Environment meant they may not have been able to access NHS care as they were not able to evidence their status. This would mean people's health records may be incomplete, or do not evidence existing and current mental health issues.

29. I raised this on several occasions with [a senior colleague]. [They] continued to state [their] view was that we should not need medical expert input. [They] asserted that [they were] reluctant to set up the mechanisms for getting medical expert advice as the advice in [their] view should not be needed. [Their] reasoning was that we should take 'claimants on their word.' I argued this was 'laudable' on [their] part, but this was not happening in practice and would not be compatible with NAO guidance.

30. I had cause to formally raise concerns because at one meeting, a very junior member of the assessment team had circulated via email the details of: a named and identified claimant, [their] medication and mental health history. The assessing officer had purported to google the medication to check its use and wanted input on [the] compensation decision and recommendation. My

concern was this was a breach of the claimant's right to privacy, the staff member had no medical training, and the assessment team should have sought advice from a medical practitioner. There was no mechanism in place to allow for advice of a medical expert to be taken. This **is** unfair and unacceptable.

The arrangements for deceased estate claims are unfair:

31. The claims brought on behalf of claimants who have now died, should be handled with greater sensitivity and support. The Scheme requires compensation, regardless of the size of the claim, to be paid to the deceased's estate. This is an administrative hurdle which in small claims is likely to act as a barrier to people ever making a claim. No specialist provision is made to support dependents, or other close kin to bring claims. This lack of support, inflexibility and the failure to exercise discretion is unacceptable.

32. In the case of eligible claims where the person affected has died, the Home Office should meet the costs of arranging probate or letters of administration, via a reputable local solicitor. This is because most people who die in the UK do not leave a valid Will. For people who may have died destitute or having been wrongly denied access to employment etc it is unlikely that they will have seen a need to make a Will. In most cases I knew of, the claimant had died prematurely, they did not reach average life expectancy and/or they had died before reaching normal retirement age. This means the last days of their lives will have been blighted by the Hostile Environment Scandal. They would not have had an opportunity to put their affairs in order and they may have died fearing that they had failed to provide for their family and/or dependents. Home Office officials showed a shocking disregard for this reality. With one senior policy official telling me within days of the death of a claimant who died in [date], *"well [they] should have got [their] claim in earlier*". [They] had spent the remainder of [their] last months after the launch of the Scheme ***, battling for an apology and trying to survive ***. I could not understand how someone who had served their entire career 25 years+ in the Home Office could be so callous.

33. I initiated meetings with Home Office Legal Team, who were resistant to any amendment to the Rules, even where all the evidence suggested there was hardship to families, as well as a huge bottleneck in assessing claims. I requested Counsel be appointed at the cost of approx. £1,600 to review options and suggested policy interventions, including:

    - A draft standard letter to act on behalf of claimant, in cases where the claimant was concerned, they might become incapacitated and wanted someone to liaise on their behalf with the Home Office.
    - The use of a constructive trust, to dispense with the rule of requiring payment to be made only to an Estate, in cases of small claims. in making a single payment in the case of a deceased estate claims, where the compensation element was

under £10,000 and it was clear who the next of kin are e.g. a spouse and taking account of the ladder of succession.
- A payment of up to £750 to allow families to seek letters of Administration or probate.

34. The legal team variously refused to instruct specialist lawyers, despite matters being time-critical, with the [representative] at one meeting referring to claimants stating: *'It was too bad they should have made a Will– these are social issues and not the Home Office's problem*.'

Access to counselling

35. Whilst working at the Home Office, attending and speaking at engagement events, I continually heard from people (including Black Civil Servants) who had been subject to trauma related to their direct experience of the Hostile Environment. Despite pleas from community leaders and acknowledgment of the harm suffered by many, Officials failed to take any action to provide support. I put forward recommendations on bereavement counselling, community groups offering culturally sensitive counselling, together with indicative costs. These recommendations were either 'parked' or ignored.

36. I was party to meetings where staff based in Leeds expressed concern around lack of training and support to deal with frequent callers with mental health issues. This included claimants who had exhibited suicidal ideation, self-harm and talked about historic abuse. I offered to set up training. This was blocked. Through my links with staff Networks I arranged a seminar in February 2020: Windrush and Intergenerational Trauma. The event included an NHS Psychiatrist, Patrick Vernon OBE, and survivors. I invited colleagues from the Windrush Policy Team. The event was oversubscribed, but no White colleagues from Windrush chose to attend. I offered to run a similar 'training' event for staff – this offer received no response. There was a lack of interest and reluctance to accept the duty of care owed to people who had gone through suffering and harm.

Apologies to victims

37. The handling of apologies has the potential to be unfair, has been unsatisfactory and felt begrudging and pedestrian. In early 2020, [a senior colleague] attempted to redefine who would get an apology and when. The Rules provided for an apology to be given to all those individuals who had been compensated. This advice was withdrawn however it was clear that the leadership thought they could either issue a standard response, with wording that resembled an apology issued because of a disrupted journey and no acknowledgment of the Home Offices role. It remains unfair that people, many of whom are elderly, where not issued with an immediate written apology. Making the apology separate from the issue of compensation.

B. Is the level of compensation being offered by the Home Office adequate? If not, in which particular areas is it inadequate?

38. Too few claims had been assessed to be able to determine whether compensation was adequate. Martin Forde had argued to ensure there was no cap on impact on life. Officials however had worked hard not to put in place a criteria or assessment framework that would enable the assessment of claims at the higher end of **£10K plus**. There was a resistance to pay anyone above £7,000 for impact on life. Indeed, there was a resistance to reach decisions in favour of the claimant.

Refund of legal costs and fees paid for Home Office products.

39. The treatment of fees paid for some immigration products including the NHS surcharge, is not only inadequate, but troubling. The treatment of historic legal costs incurred is inadequate. The failure to give people interest on the money they have lost is unfair and shocking.

40. **Immigration Products:** Claimants are being offered refunds on charges wrongly made by the Home Office for immigration products that people either did not need or did not resolve their immigration status. No interest is paid because Officials determined it would be too difficult to calculate interest. I argued this was unfair, as people effectively lost the use of their money and in some cases went into debt. It is also wrong that the Home Office should profit, by not paying back full interest on money it had wrongly taken, **the Home Office is profiting from its own mistakes.**

41. **Historic Legal Fees:** The Home Office has capped the amount of legal costs a claimant can ask to be refunded at £500. The Home Office rationale is that people should not have needed to use lawyers to sort their status. This argument is Kafkaesque, because if the Home Office could not resolve or correctly determine the immigration status of people from the Windrush Generation, then a lawyer was necessary.

    Change: Until the Home Office amends its guidance claimants, including close family members will continue to be left out of pocket by hundreds and thousands of pounds.

C. <u>How good is the Home Office at sharing information about the Windrush Compensation Scheme? What could the Home Office do better to make sure people know about the scheme, and about the support that is available?</u>

42. The Home Office should make more of an effort to contact the 12,000 people whose immigration status has been resolved. In addition, they should ensure support for close family members who may have a linked case. The Home Office did email some of those who had been helped by the Windrush Taskforce, but there was a lack of consistent join-up.

43. Too little has been done to contact those from the Commonwealth, through High Commissioners and community groups working in the UK, with direct links to those who may have been affected.

44. The Home Office has relied on Officials who were part of a Windrush Engagement Team, who did not have experience or a professional background in community outreach. I led workshops on areas such as stakeholder analysis, using methodology like the engagement ladder for the staff team working on engagement. The very low representation of Black staff made it doubly difficult to design and deliver in a way that was relevant to those communities that were directly affected. This is because Asian and White staff spent more time questioning proven communication channels and approaches than delivering outcomes and/or building relations with key influencers. The engagement team became defensive in relation to community stakeholders and I certainly received official emails, which described lawyers and community members as "ranting". This was disrespectful and betrayed the sense of antagonism felt by Home Office BICS employees to the community they were supposed to be helping.

45. *** days before the launch of the Scheme, I was tasked with standing up arrangements, including: contacting local councillors in whose patch the event was being held, enlisting help of volunteers, putting in place basic protocols like a risk register and safety plan. The more I set out good practice for delivery – the greater resistance I had. I even ended up funding the water for attendees from my own pocket and guaranteeing the venue would be paid using my own ID and debit card.

D. Is it easy to use the scheme application forms and the accompanying guidance?

46. The Scheme forms came under criticism for the amount of 'white space' – which community groups and survivors felt for complex cases, or where people had suffered moderate harm and trauma was inappropriate. The constant rehearsal of traumatic events, through a claim form, has the potential to re-traumatise. Though the Home Office had knowledge of this risk, to a sub-section of potential claimants it initially chose to do nothing. The guidance and form were not appropriate for people with cognitive impairment or who struggled with literacy issues.

47. The decision to have three sets of forms for Primary Claimant, Deceased Estates and Close Family Member was also regrettable. As limited consideration was given to ensuring the guidance and assessment criteria reflected the different information required by the different types of claimant. This has just created confusion and uncertainty.

48. The leadership offered a contract to Citizens Advice, initially to assist vulnerable claimants only. This was then extended to include any claimant who struggled with the guidance. The Home Office used the availability of the Citizens Advice (CA) to argue no change to the guidance was required. However, CA training did not include handling trauma, and indeed where claimants sought assistance on Impact on Life and costs etc – the CA training included tips on signposting to a solicitor. The provision of support on quantum and defining impact on life with vulnerable claimants, did not come

within the scope of their contract or expertise. In addition, referral to CA took away claimant's independence, as well as added delay to the process of submitting a claim

49. The Guidance was drafted with sign-off by Home Office lawyers. I asked for £1,500 to bring in the Plain English Campaign, to undertake initial work on re-stating the guidance and putting it into Plain English. Based on the community and demographic profile, I also requested an Easy Read version. At community engagement events, including one attended by the Deputy Director with responsibility, community members complained about the lack of accessibility of the guidance. They also asked for simplified guidance to aid those who because of age and circumstance had cognitive impairment.

50. I submitted a paper, which clearly stated in the light of requests for alternative formats and our continuing failure to consider these requests and make available alternatives, that we were non-compliant with the Equality Act 2010 and most likely we would have difficulty defending any claim under the public sector equality duty.

51. The response I was given initially was: We undertook focus groups and did an end user analysis exercise. What became clear was the insights gathered in February 2019, had not been used to drive forward the development of the work on the guidance of forms.

52. Because I persisted in raising the issue of accessibility, as well as suggesting solutions, I was subject to victimisation. This included threats of disciplinary action and at least two 90-minute supervision meetings, where I was harangued [two staff with management responsibility]. I was told that though my email had been to a peer within the Home Office, if my email had been leaked or subject to an Freedom of Information request, it would show the Home Office in a bad light.

53. I was later banned by from emailing colleagues to provide feedback on communications products. Even though the Communications team had approached me for advice and my feedback had been both solicited, and I had received thanks. I was told that there was a concern that my background in communications and engagement was undermining the confidence of the communications team. The team where mainly White and had experienced highly negative feedback from community groups and stakeholders. There had also been incidents where survivors had given very negative feedback to the Communications team in response to plans that had not been tested or incorporated feedback from stakeholders.

54. In response to my practical suggestions, for delivering outreach as opposed to engagement work, I was told by [a senior colleague] that it appeared to her and others **'I was standing outside and throwing stones in'.** This was in response to my suggestion that we needed improvements to communications products, an outreach strategy as opposed to engagement plan that essentially piggy-backed on to events run by local community groups.

Conclusion:

55. The Windrush Compensation Team, however streamlined will continue to deliver poor results. This is because it now sits within the care of those whose role is to deliver the successor-policies to the Hostile Environment. They have failed to deliver previous redress schemes. Now is the time for change.

December 2020