



Home Office

**The Home Office response to the Independent Chief
Inspector of Borders and Immigration's report:**

**An inspection of the Home Office's Management of Asylum
Accommodation Provision**

February - June 2018

The Home Office thanks the Independent Chief Inspector of Borders and Immigration (ICIBI) for his report and is grateful to him for highlighting areas for improvement, as well as his wider points of note on the treatment of vulnerable adults in the asylum system and the effective use of Key Performance Indicators in contracted out services.

The Government is committed to doing everything necessary to protect the rights of asylum seekers and provide them with safe and secure accommodation. In meeting the demands for asylum support and accommodation services, UK Visas and Immigration (UKVI) ensures that over 40,000 customers each day are safeguarded from destitution including some whose personal journey and circumstances mean that they are particularly vulnerable. In so doing UKVI places responsibility for safeguarding the vulnerable at the heart of its mission; working collaboratively with partners and stakeholders, to deliver an effective and efficient asylum accommodation system that protects those most in need. The Department is pleased that the ICIBI references the hard work and commitment of our staff and that of our providers to this end.

We recognise that report highlights areas where the ICIBI believes improvement should be made. The report references that a number of these improvements were already in progress at the time of the inspection, however, it is clear that there were also areas where the department needed to progress more quickly and do more to drive forward improvements.

The Home Office has accepted all the recommendations in the report. We have scoped the work needed to address the recommendations, which is reflected in the action plan we are implementing. The action plan will ensure that improvements are effected across the current operation as well as within the next generation accommodation contracts.

The Department recognises the challenges that we and our providers face together in meeting the demands for asylum support and accommodation services. This includes the importance of working collaboratively with those who have a stake in the system. A number of improvements have been made to the existing contracts since they were first introduced in 2012, as a direct result of the close work between UKVI, local authorities and Non-Government Organisations (NGO's).

In relation to accommodation standards we are conscious that the small sample of 69 properties including a number signposted by non-governmental organisations do not necessarily give an objective view of the asylum accommodation estate which totals over 12,500 properties, nor that the subjective assessment of 'desirability' provides a realistic or contractually deliverable basis for managing property standards. However, we do recognise that there is more to do, and the Department is committed to making further improvements to the current contracts ahead of transition to the new arrangements in 2019.

The Department will urgently investigate any complaint we receive that a contractor is falling short of the clear and objective standards we have set in the contract. Where there is evidence that this is the case, we work with providers to ensure issues are quickly addressed and when they are not we can, and do, impose sanctions. To maintain greater confidence and transparency in the system, we will continue to work closely with our commercial partners, local authorities, statutory organisations and non-government organisations to reach a shared and consistent understanding of appropriate property standards for asylum seeker accommodation.

The Home Office response to the recommendations:

1. By 1 October 2018, the Home Office to produce a comprehensive 'Action Plan' for asylum accommodation that:

- a. addresses the findings and recommendations from this inspection and revisits those from previous audits and inspections; includes all relevant parts of the Home Office, plus the Providers; and, sets out clear deliverables, dates, dependencies, and owners for each action.**
- b. has a nominated Senior Civil Servant as Senior Responsible Owner to oversee progress and report regularly (at least quarterly) to the Home Office Audit and Risk Committee (ARAC) or other appropriate departmental governance body.**

1.1 Accepted

1.2 The Department has carefully considered the findings and recommendations from this report and from previous audits and inspections of the asylum accommodation system, as well as from internal assurance work, using them as an invaluable guide to drive improvement plans. We accept that such initiatives have principally been managed through regular business oversight and governance; at the time of inspection, progress was not recorded in a single dedicated document.

1.3 The Department has now created a consolidated action plan detailing how we are implementing improvements in each of the areas identified. In doing so, the Department has identified further steps to address findings, beyond the specific recommendations that have been made in this and other reports. The action plan currently comprises 25 areas for action, and we are consulting further with stakeholders to ensure it is fully validated and effective, alongside pressing on with implementation. The action plan is actively owned by the nominated Senior Civil Servant and appropriate governance is in place through UVKI's assurance structure.

2. Introduce regular quality assurance checks for decisions about the application of service credits for non-conformance with COMPASS contract Key Performance Indicators (KPI) that are independent of those involved in the decision, and have the Contract Management Group (CMG) provide a written monthly account of service credits applied and waived for approval by a UKVI manager with delegated authority for expenditure at or above the total value of the applied and waived credits.

2.1 Accepted

2.2. The Department has a formal governance process in place for the Key Performance Indicator (KPI) regime, details of which are set out in the contracts and cover the provision of the whole service. It is important to note that the decision on whether KPI non-conformance should result in the application of a service credit is a commercial matter that is separate and distinct from operational consideration of whether shortcomings in individual property services amount to a KPI non-conformance.

2.3 The discussion around the application of a Service Credit takes place at the formal monthly Contract Management Group (CMG) and the results recorded formally in the minutes and agreed by both parties, as the recommendation suggests. If the Provider does not accept that a Service Credit should be applied, then the discussion would escalate to the Strategic Review Management Board (SRMB) again clearly recorded in the minutes.

2.4 The Department recognises however that there is further scope for clarity around this process and for a more consistent set of processes to be implemented between the six contracts to enable a more transparent and regularly assured assessment of non-conformances. We will implement a revised process, with a document that clearly sets out roles and responsibilities and consolidates the contractual schedules, which will provide for greater transparency to future audit and validation as well as ensuring compliance with accounting rules.

3. In advance of the commencement of the new COMPASS contracts:

a. Review the role, size, structure, geographical distribution, workload and performance targets of the Contract Compliance Team, and confirm it is fit for purpose, and staff are fully-trained for their roles

b. Agree and enforce (through line management and quality assurance) the Standard Operating Procedures (SOPs) for Contract Compliance Officers, covering as a minimum:

- **the selection of properties to inspect, including when to follow up a complaint and when to re-inspect**
- **mandatory completion of risk assessments**
- **consistent application of Housing Health & Safety Rating System (HHSRS) methodology and the COMPASS contract ‘requirements’**
- **how to carry out meaningful “pastoral” (welfare) checks, and how to deal with any safeguarding or other issues that arise**
- **managing relationships with Provider staff**

3.1 Accepted

3.2 Over the last year the Department has made a number of changes to the structure of the teams managing accommodation providers. This is to ensure that decision quality and consistency is at the heart of what we do. The Department commenced its review of the scope and operation of the Contract Compliance Teams (CCT) in November 2017 by consolidating six regional teams into a single national function. The Department will continue to review and implement changes ahead of the commencement of the new contracts, to ensure that CCT remains fit for purpose and that all staff share a common and clear understanding of their evolving role within the wider contractual governance. At the time of the inspection the Standard Operating Procedures in place were at an early stage in achieving more consistency nationally; the findings from the inspection are being used to inform their further development and application.

4. Establish a process to capture data about local authority inspections of asylum accommodation, including a record of all Houses of Multiple Occupation (HMO) licences held for COMPASS properties, and any local authority objections to bedroom sharing or other Provider arrangements.

4.1 Accepted

4.2 The Department and its accommodation providers recognise the importance of working closely with local Government; having always been open to joint inspections and other forms of co-operation with local authority property inspectors. The contracts are clear that Providers must ensure that they manage their properties in compliance with local housing regulations, including holding all necessary licences. Some local authorities will use the Strategic Migration Partnerships as a vehicle to notify us of issues they identify on their inspections, whilst others will notify us direct.

4.3 We accept that the Home Office are not in all circumstance notified of inspections conducted by local authorities, particularly if no defects are encountered. We also recognise that there could be greater consistency in how they notify us, held in a readily analysable format. It is not within the Department's power to require all local authorities routinely to send the Department their own inspections data. However, we are exploring opportunities to pilot closer working with a number of local authorities, including on data sharing, and will ensure that record keeping on Provider property licensing remains readily accessible.

5. In relation to information sharing:

a. Discuss and agree with Providers, involving NGOs and other stakeholders as appropriate, what information needs to be shared (and in what form and detail), especially in the case of particularly vulnerable individuals, to ensure that they are accommodated appropriately, and make the necessary improvements to Home Office collection and record-keeping to enable this.

b. (in addition to the commitment, under the new contracts, to “provide software and training aids as required to enable the Provider to manage, administer and share appropriate data in relation to each Service User and their dependants with the relevant entities”), define the data standards (and terminology) Providers must employ in 2018-19 in relation to the reporting of inspection visits, defects/repairs, complaints and incidents, and any other essential categories of information, such as signs of vulnerability, and ensure that these are in regular use by Q3 2018-19, so that the data can be compared and analysed, and lessons learnt, before the new contracts go live.

5.1 Accepted

5.2 The Department recognises the importance of the sharing of data, between Providers, local authorities and other stakeholders, to the effective operation of the asylum accommodation and support system. The nature of many individuals' circumstances means that information regarding vulnerability is not always known to

the Home Office or appropriate to share at the point accommodation is first requested by, or provided to, asylum seekers. The Department recognises that there is further development needed to strengthen the consistency in capture and sharing of data on vulnerable individuals. The Department is reviewing with its Providers and other stakeholders the existing data sharing mechanisms to ensure that relevant and adequate data is shared so that asylum seekers are appropriately accommodated and safeguarded, within the framework of data protection requirements.

5.3 The existing contracts set out the data standards that Providers must meet regarding reporting of inspections, property defects, incidents and complaints, and these will continue to apply and be regularly used for the remaining stages of the contract. The Department recognises that there are variances between Providers' systems in the way some detailed terms are recorded and classified that make cross comparison challenging. The Department is reviewing these data standards and terminology internally and with its Providers and considering what cost-effective changes can be made, or analysis undertaken, in the remaining stage of the current contracts to enable lessons to be learnt. Any changes will be used to inform the mobilisation and transition to the new contracts which will commence in January 2019.

6. Review the Providers' policies, processes and practices in respect of safeguarding and the identification and handling of vulnerabilities and ensure that they are in line with those of the Home Office and reflect the department's latest experience in these areas and understanding of 'best practice'.

6.1 Accepted

6.2 The Department is reviewing each of its providers' policies, processes and practices on safeguarding and vulnerability, and will ensure an effective fit with their Home Office equivalents and with best practice as far as possible ahead of transition to the new contracts in 2019. We have also convened a regular Safeguarding Working Group including senior representation from the Department and each of the Providers to oversee consistent delivery of this and other items related to vulnerability and safeguarding.

7. Capture and analyse data in relation to particularly vulnerable groups, such as LGBTQI+ individuals, victims of torture or domestic violence, trafficking victims, and pregnant and post-partum women, to test:

a. the appropriateness in such cases of the "longstanding policy of providing accommodation to asylum seekers on a no choice basis", including bedroom sharing in some instances,

b. the effectiveness (outcomes) of requests from asylum seekers with particular vulnerabilities, care needs or health problems for specialist accommodation.

7.1 Accepted

7.2 The Department holds a range of data on vulnerable groups that we utilise to ensure the needs of individuals are considered and met on a case-by-case basis when accommodation is allocated. The Department does not believe that there is any tension between the “no-choice” asylum accommodation policy and our duty to take account of the needs of vulnerable individuals. Under our existing policy, a person’s individual circumstances, including any particular vulnerabilities, are taken into consideration when accommodation is allocated. However, this does not extend to allowing individuals to choose where that suitable and appropriate accommodation should be located, which remains an essential principle to ensuring asylum seekers are housed across the United Kingdom in a more equitable distribution.

7.3 We recognise that there is further development needed to strengthen our ability to analyse data on vulnerable groups more systematically. Work is already underway across the wider Border Immigration and Citizenship system to ensure that there is a consistent approach being taken to vulnerability data capture and recording. The Department is also looking carefully at how more enhanced data in relation to vulnerable groups can be made routinely available as part of planned enhancements to departmental case-working systems for 2019. It is expected that these enhancements will enable further analysis for vulnerable groups, including those in the accommodation estate.

7.4 In the interim, we will build upon the data analysis undertaken during this inspection to test more proactively that allocated accommodation remains appropriate. In addition, we will continue to expand the wider asylum system’s operational capability to support vulnerable asylum seekers through a consolidated Safeguarding Hub and will undertake further analysis of the accommodated population using operational data which that will provide. We are also working closely with our Providers through a senior level Safeguarding Working Group we have set up to ensure that best practice in safeguarding people in vulnerable groups flows across the system.

7.5 The Department acknowledges that the current available data on decisions outcomes and effectiveness of requests for specialist accommodation provides limited ability for historic analysis. We are continuing to work closely with our IT and commercial partners and other stakeholders to assess what further opportunities are available once the new IT system for asylum support casework has been fully implemented later this year.

8. Review (and finalise) the Purpose, Terms of Reference and Membership of the National Asylum Stakeholders Forum (NASF), and its sub-group dealing with asylum support, checking members’ willingness and ability to cascade outputs to locally-based charities and volunteers, and establishing an effective and reliable alternative way of doing this, if required.

8.1 Accepted

8.2 The Department is grateful for, and welcomes, the important strategic perspective that members of the National Asylum Stakeholder Forum (NASF), and its sub groups, contribute to the UK asylum and resettlement systems. These groups support delivery by allowing for detailed and constructive discussions, the sharing of

information and the evaluation of projects, between the Home Office and national NGOs. The Department does not consider the NASF to be the primary mechanism for engaging with regional and local stakeholders – instead funding Strategic Migration Partnerships principally for this purpose.

8.3 The purpose, terms of reference and membership of the Strategic Engagement Group (the highest-level meeting within the NASF engagement structure) and its sub-groups were already under review during the inspection. This review is expected to be concluded and its outputs, including the cascade mechanisms, formally agreed at the next available round of meetings.

9. Provide an update on the development of any new “measures to assist the integration of those granted asylum” as a result of the Home Office’s consideration of the conclusions of the Casey Review (‘A Review into Opportunity and Integration’).

9.1 Accepted

9.2 The Government published the Integrated Communities Strategy Green Paper on 14th March 2018, which took into consideration the evidence from Dame Louise Casey’s independent review. The consultation closed on 5th June and the Government is currently considering responses to the consultation.