



An inspection of contingency asylum accommodation

November 2023 – June 2024

David Bolt

Independent Chief Inspector of
Borders and Immigration (Interim)

An inspection of contingency asylum accommodation

November 2023 – June 2024

Presented to Parliament pursuant to Section 50(2) of the
UK Borders Act 2007

October 2024



© Crown copyright 2024

This publication is licensed under the terms of the Open Government Licence v3.0, except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at www.gov.uk/official-documents

This publication is also available at www.gov.uk/ICIBI

Any enquiries regarding this publication should be sent to us at

Independent Chief Inspector of
Borders and Immigration,
1st Floor, Clive House,
70 Petty France,
London SW1H 9EX
United Kingdom

ISBN 978-1-5286-5175-2

E03198215 10/24

Printed on paper containing 40% recycled fibre content minimum.

Printed in the UK by HH Associates Ltd. on behalf of the Controller of His Majesty's Stationery Office

Our purpose

To help improve the efficiency, effectiveness and consistency of the Home Office's border and immigration functions through unfettered, impartial and evidence-based inspection.

All Independent Chief Inspector of Borders and Immigration inspection reports can be found at www.gov.uk/ICIBI

Email us: chiefinspector@icibi.gov.uk

Write to us: Independent Chief Inspector of
Borders and Immigration
1st Floor, Clive House,
70 Petty France,
London, SW1H 9EX
United Kingdom

Contents

Foreword	3
1. Background	8
2. Key findings	33
3. Recommendations	61
4. Scope and methodology	66
5. Inspection findings: Strategic approach and value for money	69
6. Inspection findings: Leadership and management of operations	109
7. Inspection findings: Assurance processes	132
8. Inspection findings: Use of data and management information	161
9. Inspection findings: Service user experience	187
10. Inspection findings: General security, and health and safety	237
Annex A: Role and remit of the Independent Chief Inspector	255
Annex B: ICIBI 'expectations' of asylum, immigration, nationality and customs functions	258
Annex C: Asylum accommodation contracts	263

Annex D: Data and management information	265
Annex E: Photographs of asylum accommodation	267
Annex F: ICIBI letter to the Home Secretary, 20 December 2023	272
Annex G: ICIBI letter to the Immigration Minister, 9 February 2024	274
Acknowledgements	276

Foreword

The bulk of the evidence for this inspection was gathered between November 2023 and January 2024. On 31 January 2024, the inspection team presented its emerging findings to the Home Office at the end of the onsite phase of the inspection. However, it was not possible to complete the inspection in the usual manner as there was no Independent Chief Inspector in post from 21 February to 3 June 2024.

In June 2024, I asked the Home Office for some additional information and updated evidence. I also visited the Bibby Stockholm (on 24 June), Wethersfield (on 28 June) and Napier Barracks (on 1 July) to see the accommodation at first-hand, to talk to staff (from the Home Office, the accommodation providers, and providers of other services) who either worked at these sites or had management responsibility for them, and, especially, to meet and listen to the ‘service users’ about their experiences of living there.¹

This report, including the Key Findings and Recommendations, reflects both the earlier and later evidence. It also takes account of the findings of the National Audit Office’s (NAO) investigation into asylum

1 Both the Home Office and the asylum accommodation providers refer to the individuals and families who are accommodated as ‘service users’. For ease, this report also uses this term.

accommodation, published in March 2024, which focused on the Home Office's efforts to set up 'large sites' and reduce the use of hotels.

This inspection examined the Home Office's use of contingency asylum accommodation. Like the NAO investigation, it looked at the department's strategies for dealing with increasing demand for this type of accommodation while needing to reduce the costs. In addition, it explored the Home Office's processes and practice for assuring the performance of the accommodation service providers, and the delivery of support and services to the service users.

There are nine recommendations. They flow directly from the inspection findings and are intended to be self-explanatory. They identify improvements to the efficiency and effectiveness of the Home Office's arrangements for contingency asylum accommodation that I believe the department can and should make, including in relation to strategies and plans, stakeholder engagement, governance, contract compliance and assurance checks, record-keeping and data quality, the provision of purposeful activities, safeguarding vulnerable people, organisational learning, and communication.

All of these areas for improvement are important. In most cases, the underlying issues, such as poor or non-existent data, are not unique to contingency asylum accommodation and have featured in previous inspections of other areas of the Borders and Migration System. Meanwhile, in 2018 and in 2021, the

Independent Chief Inspector of Borders and Immigration made explicit recommendations regarding the need to overhaul the Home Office's assurance regime for the asylum accommodation contracts. These were accepted, but implemented only in 2024, and then not fully. Weaknesses in assurance have contributed to service users experiencing very different levels of service and support.

However, I would like to draw particular attention to one long-standing, systemic issue that this inspection has again exposed.

Lack of meaningful engagement with stakeholders and poor communication ('one-way', telling rather than listening) from the Home Office's Migration and Borders System (and its forerunners) about policies, practices and plans has been a recurring theme of inspections over many years. Here, the department recognised the importance of engaging and communicating with those stakeholders on whose active support it is reliant. It has created a host of boards and fora, operating at different levels, and it has made some good progress at local level, at Portland for example. Meanwhile, it has been much less effective in engaging constructively with some of the more critical stakeholders, including some non-governmental organisations (NGOs) who have been providing direct support to individuals in contingency asylum accommodation. While it will never be able to satisfy some critics, it is clear that the Home Office still has a long way to go to build trust and confidence

in its willingness to be open and honest about its intentions and performance, and any reluctance to share information, whether real or perceived, will be seen as evidence that it is not. Timing is all-important, and while there are risks in engaging early, it must avoid any hint of 'too little, too late'.

The need for effective engagement and communication also extends to the service users. At Wethersfield, the Bibby Stockholm, and Napier Barracks, I spoke with groups of around 20 residents. I am grateful to them for their candour. Each group had complaints about the food and the accommodation, and some raised individual issues about access to healthcare, for example.

However, the thing that stood out, and set Napier apart, was the evident impact on the mental health and wellbeing of those accommodated at Wethersfield and on the barge of not knowing how long they would be kept there.

At Napier, the men believed they would be moved to dispersal accommodation within 90 days and knew 'to the day' how long they had been there. Some had received their move-on dates and locations and were clearly excited. The atmosphere was positive. This was in stark contrast to how things had been when I last visited Napier in early 2021. At Wethersfield and the Bibby Stockholm, the men had different understandings of how long they might be there, and they measured the time since their arrival in months, with some appearing unsure how long they had already been there. They were

anxious and mistrustful about what would happen to them next.

In 2021, I wrote to the Home Office recommending that it create the means to keep individuals who had claimed asylum informed about where their claim was in the process. This was what each of them wanted to know more than anything else, and it has become even more of an issue with the removal of the six-month Service Level Agreement (SLA) for asylum decisions, backlogs and lengthening decision times, and legislative changes. While the Home Office now has a more regular presence at the large sites, these staff cannot answer that all-important question. I accept that, with the numbers now in the asylum system, and the potential for further changes to eligibility criteria, this is a difficult time to introduce a new service that provides updates on individual claims, for example through text messages, a 'hotline', or an indicator on GOV.UK of current average waiting times (as was the case with the EU Settlement Scheme). However, it is something that the Home Office should be striving to do as soon as it is practicable. The reintroduction of an SLA would be a start.

This report makes nine recommendations. It was sent to the Home Secretary on 3 September 2024.

1. Background

- 1.1 Between May and November 2021, the Independent Chief Inspector of Borders and Immigration (ICIBI) completed ‘An inspection of contingency asylum accommodation’. The inspection considered the Home Office’s use of hotels, hostels, and self-contained apartments as contingency asylum accommodation.² The report was laid in Parliament by the Home Secretary in May 2022. The Home Office accepted all seven recommendations in full.³
- 1.2 The current inspection focused on the Home Office’s use of contingency accommodation for asylum seekers since that time, looking in particular at what has changed. Contingency accommodation is required when the number

2 Independent Chief Inspector of Borders and Immigration, ‘An inspection of contingency asylum accommodation, May 2021 to November 2021’ (published May 2022). <https://www.gov.uk/government/publications/an-inspection-of-contingency-asylum-accommodation>

3 Home Office, ‘Response to the ICIBI’s report: ‘An inspection of contingency asylum accommodation, May 2021 to November 2021’’ (published May 2022). <https://www.gov.uk/government/publications/response-to-an-inspection-of-contingency-asylum-accommodation-hotels>

of asylum seekers arriving requiring support exceeds the supply of bedspaces in dispersal accommodation.⁴ The majority of contingency asylum accommodation is still found in hotels and hostels, with some apartments. But, in addition to Napier Barracks, opened in 2020, it now includes the former Ministry of Defence site at Wethersfield and a vessel at Portland Port (the Bibby Stockholm).

Legislation and Asylum Accommodation and Support Contracts

- 1.3** Section 95 of the Immigration and Asylum Act 1999 enables the Home Secretary “to provide, or arrange for the provision of, support for asylum seekers or dependants of asylum seekers who appear to be destitute or are likely to become destitute within a prescribed period, while their asylum application is considered”.⁵ To meet this

4 Dispersal accommodation is usually offered on a self-catered basis in privately rented furnished houses, flats or rooms in houses in multiple occupation. It is provided as longer-term housing to people who have been granted asylum support and are awaiting the determination of their asylum claim.

5 Immigration and Asylum Act 1999. <https://www.gov.uk/government/publications/living-in-asylum-accommodation>

legal requirement, the Home Office entered into Asylum Accommodation and Support Contracts (AASCs) with service providers.⁶ Further information about the AASCs and associated contracts is provided at Annex C.

1.4 At the time the current contracts were awarded, in 2019, it was expected that suppliers would source dispersal accommodation from existing housing stock in communities around the UK for asylum seekers to stay in until their asylum claim was determined. Where accommodation was needed urgently before an asylum seeker's application for support had been assessed and longer-term accommodation arranged, the contract supported the sourcing of initial accommodation. This was usually hostel-type accommodation which could be provided on a full-board, half-board, or self-catering basis, normally for around three to four weeks. However, as the number of migrants arriving by small boat increased, from 2020 the Home Office has had to rely increasingly on hotels as contingency accommodation. The increase in the asylum intake also coincided with

6 UK Parliament, 'Asylum Accommodation and Support: Schedule 2, Statement of Requirements', paper reference DEP2018-1112, (deposited in House of Commons, committed on 12 November 2018). <https://depositedpapers.parliament.uk/depositedpaper/2280593/files>

measures introduced in response to the COVID-19 pandemic, including pausing the cessation of asylum support, which led to a reduction in places in dispersal accommodation being freed up.⁷

- 1.5** As the large-scale use of hotels and other sites, such as military bases, was not foreseen at the time the AASCs were let, the contracts were not designed to cater for all these different forms of accommodation. The Statement of Requirements (SoR) at Schedule 2 of the AASC, refers to the accommodation services to be provided as “the provision of residential Accommodation (either Houses in Multiple Occupancy (known here on in as ‘HMOs’), houses, flats or hostels)”.
- 1.6** The SoR specifies the standards for accommodation, transport, and services that service providers must meet, as well as the general principles to which they must adhere, in delivering support and accommodation to asylum seekers.
- 1.7** The SoR stipulates that service providers must conduct monthly visits to each accommodation site and provide a follow-up report containing data to demonstrate service standards have been met. In

7 Home Office, ‘Guide to Living in dispersal accommodation’ (published March 2023). <https://www.gov.uk/government/publications/living-in-asylum-accommodation>

addition, the SoR highlights that Section 55 of the Borders, Citizenship, and Immigration Act 2009 imposes a duty on the Home Office and its service providers to have regard to the need to safeguard and promote the welfare of children in the UK.⁸

- 1.8** AASCs also include the requirement for service providers to signpost the feedback and complaints process to ‘service users’ and to resolve complaints appropriately. Migrant Help administers the complaints service through the Advice, Issue Reporting and Eligibility (AIRE) assistance services contract, providing a single point of contact for ‘service users’ within the asylum system for this provision.⁹
- 1.9** The Home Office has a separate contract with Corporate Travel Management North Ltd (CTM) for the provision of Bridging Accommodation and Travel Services. This contract was varied in 2023 to include the provision of Vessel Accommodation

8 Borders, Citizenship and Immigration Act 2009, Section 55. <https://www.legislation.gov.uk/ukpga/2009/11/section/55>

9 The term ‘service users’ is used in the AASC and throughout this report to refer to asylum seekers housed in contingency asylum accommodation.

Services on the Bibby Stockholm barge, docked at Portland Port.¹⁰

1.10 Dispersal accommodation was out of scope for this inspection, and for the purposes of this report the ICIBI has considered all other categories of accommodation for asylum seekers to be contingency asylum accommodation (CAA). The Home Office provided snapshot data for 28 November 2023, which showed 415 CAA sites were either in use at that date or were planned to be in use by 31 January 2024. Figure 1 below details four categories of CAA, what the ICIBI included in each for the purpose of this inspection, and the number of sites in each category. On 27 June 2024, the Home Office provided its latest figures for sites in use, and these are included in brackets in figure 1.

10 Crown Commercial Service, 'CCTM22A01 Provision of Bridging Accommodation and Travel Services Contract' (published 12 April 2023). <https://www.contractsfinder.service.gov.uk/Notice/e424ee5f-2839-4f1e-bd89-5b97d7910935>

Figure 1: Definitions of the four categories of contingency asylum accommodation

Category of contingency asylum accommodation	ICIBI definitions used for this inspection	Number of operational sites in use on 28 November 2023, or planned to be in use by 31 January 2024 (figure as at 27 June 2024)
Contingency hotels	All types of hotels used to accommodate service users awaiting the outcome of asylum applications. This included contingency hotels, spot booked, initial accommodation, minor initial accommodation and ring-fenced hotels. ^{11, 12}	401 (225)

¹¹ ‘Spot booked hotels’ is a term used by the Home Office to refer to a small number of hotels procured from AASC providers by the Home Office from November 2022 to meet immediate and short-term accommodation needs. It includes the booking of individual hotel rooms for one or more nights. The term differentiates between these and contingency hotels that are secured on a longer basis.

¹² ‘Ring-fenced hotels’ is a term the Home Office uses to refer to sites in London and the Southeast used exclusively to accommodate individuals processed through Manston who have arrived via small boats. They typically stay for up to 48 hours before being moved to another contingency asylum accommodation site.

Category of contingency asylum accommodation	ICIBI definitions used for this inspection	Number of operational sites in use on 28 November 2023, or planned to be in use by 31 January 2024 (figure as at 27 June 2024)
Large sites	Surplus military sites, with the aim to reduce the use of contingency hotels, managed by a separate team under the Large Sites Accommodation Programme. Only one large site, Wethersfield in Essex, was in operation at the time of this inspection. Another site, RAF Scampton in Lincolnshire, was being developed for use.	1 (1)
Vessels	The Bibby Stockholm barge at Portland Port was the only vessel in operation at the time of this inspection. In July 2024, the Home Secretary announced it will cease to be used as contingency asylum accommodation in January 2025 when the current lease expires.	1 (1)
Other	Other contingency sites that were sourced by the Home Office as an alternative to hotels. This included hostels, apartments and Napier Barracks. ¹³	12 (18)
Total		415 (245)

13 Napier Barracks, another former Ministry of Defence site, was not included in the Home Office’s large sites programme in the evidence provided for this inspection.

Large sites programme

- 1.11** In December 2022, the Prime Minister announced plans to reduce reliance on hotels through the use of former military sites as part of a new approach to asylum accommodation. The Large Sites Accommodation Programme (LSAP), created by the Home Office in July 2023, replaced the former Asylum and Detained Accommodation Programme (ADAP). The LSAP supported the Prime Minister's ten-point plan to tackle illegal migration, with the intention of using large sites as non-detained accommodation. The Prime Minister directed that the LSAP deliver 4,100 new bedspaces by the end of 2023 and 10,000 by June 2024, to reduce reliance on hotels to accommodate destitute asylum seekers. In July 2023, the LSAP was replaced by the Asylum Accommodation Programme – Non-Detained programme (AAP (ND) programme).
- 1.12** By March 2024, while the Home Office had made progress in closing hotels, only two new LSAP sites were in operation, one large site at the former Ministry of Defence (MoD) site at Wethersfield, and one vessel, the Bibby Stockholm barge, at Portland Port. These provided a total of approximately 1,300 bedspaces. At the time of inspectors' visits, there were 303 service users on board the Bibby Stockholm barge (on 16 January 2024) and 555 service users on site at

Wethersfield (on 8 February 2024). The Home Office provided updated occupancy figures for the number accommodated at both sites on 16 June 2024 – 412 on the Bibby Stockholm and 544 at Wethersfield.

- 1.13** The Home Office planned to open a further former MoD site, RAF Scampton, and a former student accommodation site at Manchester Road in Huddersfield by 31 March 2024. These two further sites would be required to be operational for the Home Office to achieve its revised target of 2,500 new bedspaces from alternative sites to hotels by this date. In an update provided by the Home Office on 27 June 2024, it confirmed that the first service users were estimated to arrive at Scampton in August 2024 and at Huddersfield in November/December 2024. In both cases, there are legal conditions that need to be met before the sites can be occupied, and the Home Office is working with the Department of Levelling up, Housing and Communities to try to progress matters.

Allocation to asylum accommodation

- 1.14** The Home Office's 'Allocation of asylum accommodation policy' contains the suitability criteria for accommodating those receiving asylum support at the following non- detained accommodation sites:

- ex-MoD sites (including, but not limited to, RAF Scampton and Wethersfield)
- vessels (including, but not limited to, the Bibby Stockholm barge at Portland Port)
- the former barracks at Napier

1.15 According to the policy, in general, all types of asylum accommodation are suitable for most individuals receiving asylum support, except those with the most serious physical and mental health needs. The “overriding principle is that asylum accommodation is offered on ‘a no choice basis’”, and there is only very limited scope for a person to challenge their suitability for a site.¹⁴ The suitability criteria in the policy also cover room sharing in any asylum accommodation setting.

1.16 While the Home Office delegated the allocation of accommodation to service users to the service providers for the majority of CAA sites, based on availability and vulnerability markers on a person’s record on Home Office systems, in the case of Wethersfield, the Bibby Stockholm barge, and Napier Barracks, the allocations were made by the Home Office using the allocations policy.

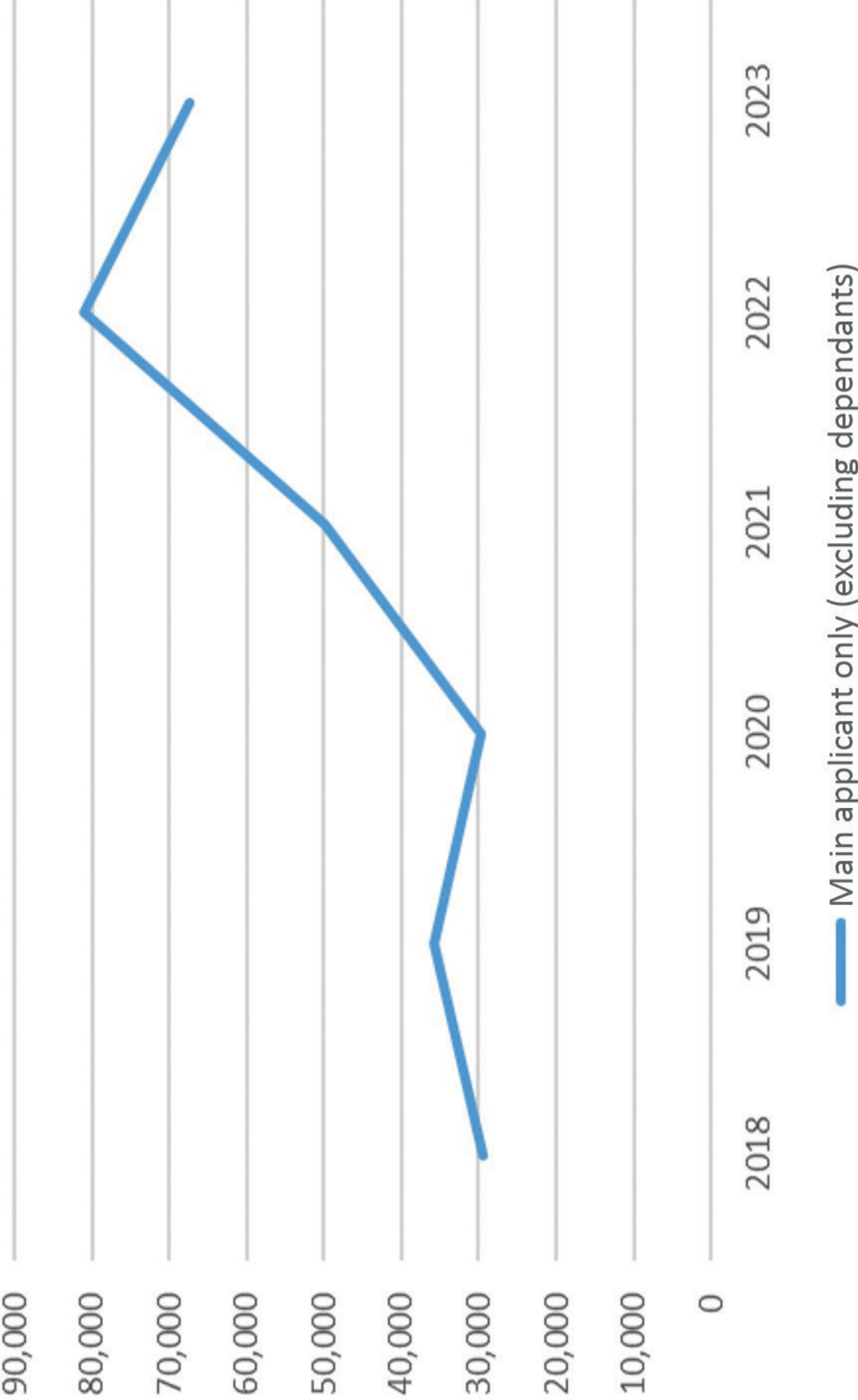
14 Home Office, ‘Allocation of asylum accommodation policy’ (updated 3 May 2024). <https://www.gov.uk/government/publications/asylum-accommodation-requests-policy>

Immigration statistics

1.17 The Home Office publishes transparency data on migration on a quarterly basis. Figure 2 shows the level of asylum applications since 2018. Following a dip in 2020, due to the impact of the COVID-19 pandemic, applications steadily increased, peaking at 81,130 in 2022, before falling the following year to 67,337.¹⁵

15 Home Office, Immigration system statistics data tables (published 29 February 2024). <https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables#asylum-and-resettlement>

Figure 2: Annual asylum applications to the UK from 2018 to 2023



1.18 Since 31 December 2022, the Home Office has published data on the number of asylum seekers accommodated in ‘initial accommodation’, ‘contingency accommodation – hotels’, and ‘contingency accommodation – other’. Prior to this date, published migration data only referred to service users housed in dispersal accommodation. Since 30 September 2023, the department’s published statistics have included ‘other accommodation’ as an additional category, reflecting the number of individuals housed at large sites (Wethersfield) and on vessels (the Bibby Stockholm barge). Quarterly figures on the number of people in different types of asylum accommodation are summarised in figure 3.¹⁶

16 As set out in figure 1 above, for this inspection, the ICIBI has referred to all non-dispersal accommodation as contingency accommodation, and further divided this into four groups: contingency hotels; large sites; vessels; Other.

Figure 3: Types of accommodation used to house asylum seekers each quarter from 31 December 2022 to 31 December 2023¹⁷

Accommodation type	31 Dec 2022	31 Mar 2023	30 Jun 2023	30 Sep 2023	31 Dec 2023
Dispersal accommodation ¹⁸	56,143	56,979	58,636	58,444	56,489
Contingency accommodation (hotel)	45,775	47,518	50,546	56,042	45,768
Contingency accommodation (other) ¹⁹	1,945	2,088	2,113	2,427	2,010

¹⁷ [Home Office, Immigration system statistics data tables](#)

¹⁸ ‘Dispersed (or dispersal) accommodation’ is defined by the Home Office as longer-term accommodation provided to asylum seekers whose claim for asylum support has been agreed. It is typically in the form of multiple occupancy properties in the private rented sector. Occupants of dispersal accommodation are permitted to stay there while they remain eligible for Asylum Support. See: <https://assets.publishing.service.gov.uk/media/65df594bf1cab36b60fc4737/asylum-seekers-receipt-support-datasets-dec-2023.xlsx>

¹⁹ ‘Contingency accommodation (other)’ is a reporting category used by the Home Office to cover all other forms of non-hotel contingency accommodation, excluding large sites and vessels which are included as ‘Other Accommodation’. See: <https://assets.publishing.service.gov.uk/media/65df594bf1cab36b60fc4737/asylum-seekers-receipt-support-datasets-dec-2023.xlsx>

Accommodation type	31 Dec 2022	31 Mar 2023	30 Jun 2023	30 Sep 2023	31 Dec 2023
Initial accommodation ²⁰	1,659	1,651	1,979	1,968	1,398
Other accommodation ²¹	0	0	0	129	817
Grand total	105,522	108,236	113,274	119,010	106,482

20 'Initial accommodation' is defined by the Home Office as accommodation provided to asylum seekers who have indicated that they are unable to support themselves or their families and are therefore at risk of destitution. It is made available in order to provide shelter while a request for Asylum Support is being assessed. It is typically in full-board hostel-style residences. Occupants of initial accommodation who receive a positive outcome to their support request generally move to dispersal accommodation when a suitable property becomes available.

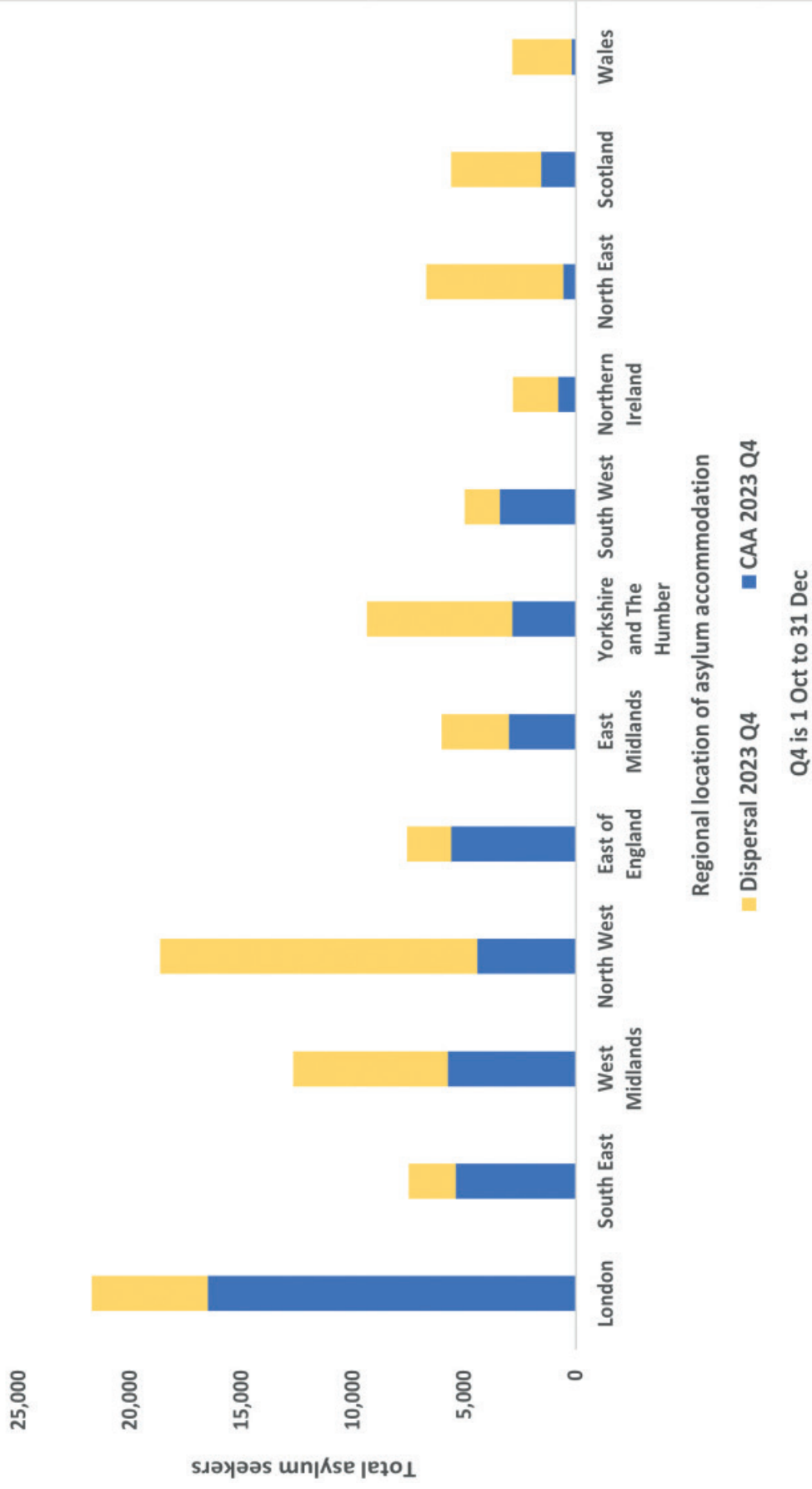
See: <https://assets.publishing.service.gov.uk/media/65df594bf1cab36b60fc4737/asylum-seekers-receipt-support-datasets-dec-2023.xlsx>

21 'Other accommodation' was an additional category created by the Home Office to reflect the number of individuals housed at large sites (Wethersfield) and on vessels (the Bibby Stockholm).

- 1.19** On 31 December 2023, 46.9% of asylum seekers who were supported in Home Office accommodation lived in contingency or initial asylum accommodation. The number of asylum seekers in contingency and initial asylum accommodation increased each quarter, from 49,379 in December 2022, to 60,437 in September 2023, before reducing to 49,993 in December 2023. Throughout this period the vast majority of asylum seekers in contingency accommodation were housed in hotels.
- 1.20** Figure 4 compares on a regional basis where asylum seekers are housed in contingency and initial accommodation with where they are housed in dispersal accommodation.²² While the majority of asylum seekers in contingency and initial asylum accommodation are located in London, the majority of asylum seekers in dispersal accommodation are located in the North West, Yorkshire and the Humber, and the North East.

22 Home Office, Immigration system statistics data tables

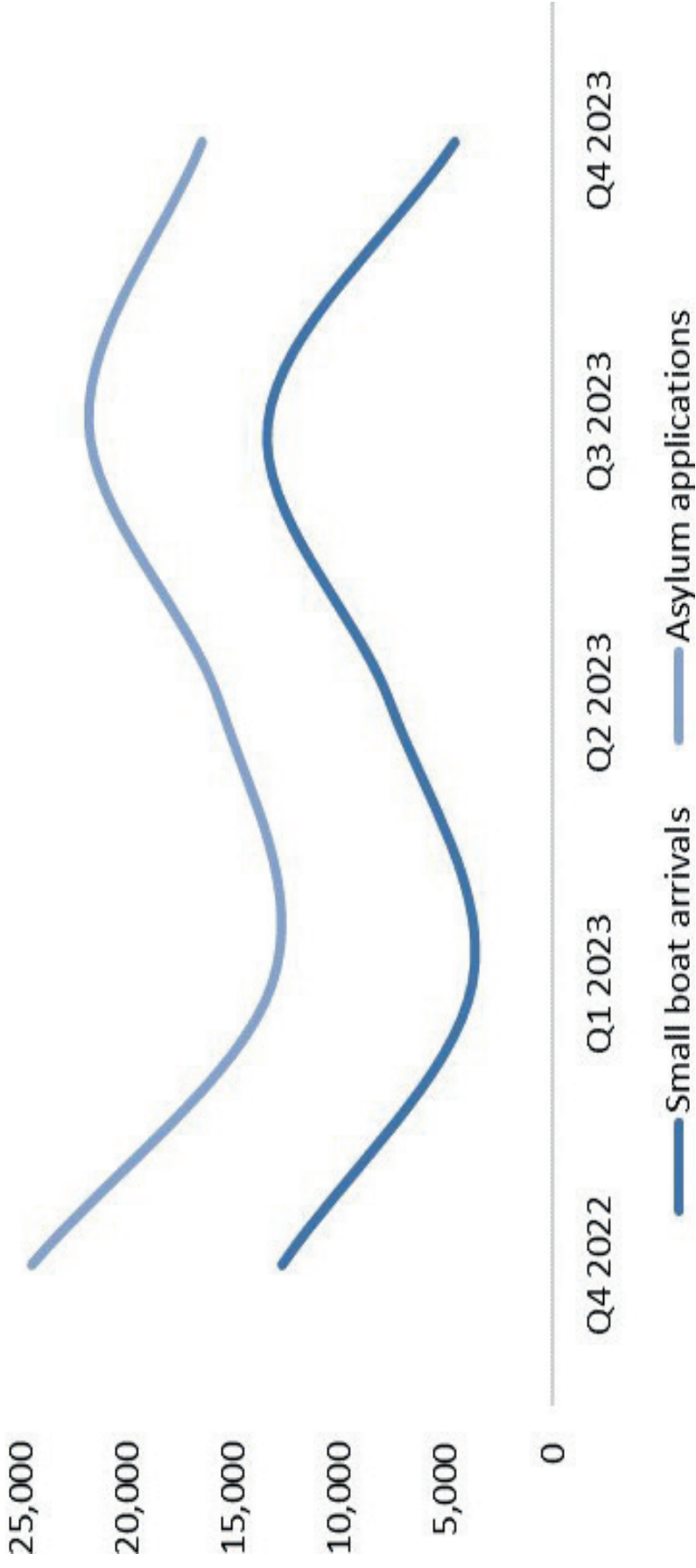
Figure 4: Regional location of asylum seekers in contingency and initial accommodation compared to those in dispersal accommodation



1.21 Since December 2022, the number of people applying for asylum has followed a similar trajectory to the numbers arriving in the UK by small boat. In the year to 30 June 2023, 37% of those claiming asylum had arrived in the UK by small boat. The remainder will have arrived via a legal route, on falsified documents, or undetected by another route.²³ See figure 5.

23 Home Office, 'How many people do we grant protection to?', accredited official statistics (published 29 February 2024), section 2.2. <https://www.gov.uk/government/statistics/immigration-system-statistics-year-ending-december-2023/how-many-people-do-we-grant-protection-to#asylum-applications>

Figure 5: Small boat arrivals and asylum applications from December 2022 to December 2023



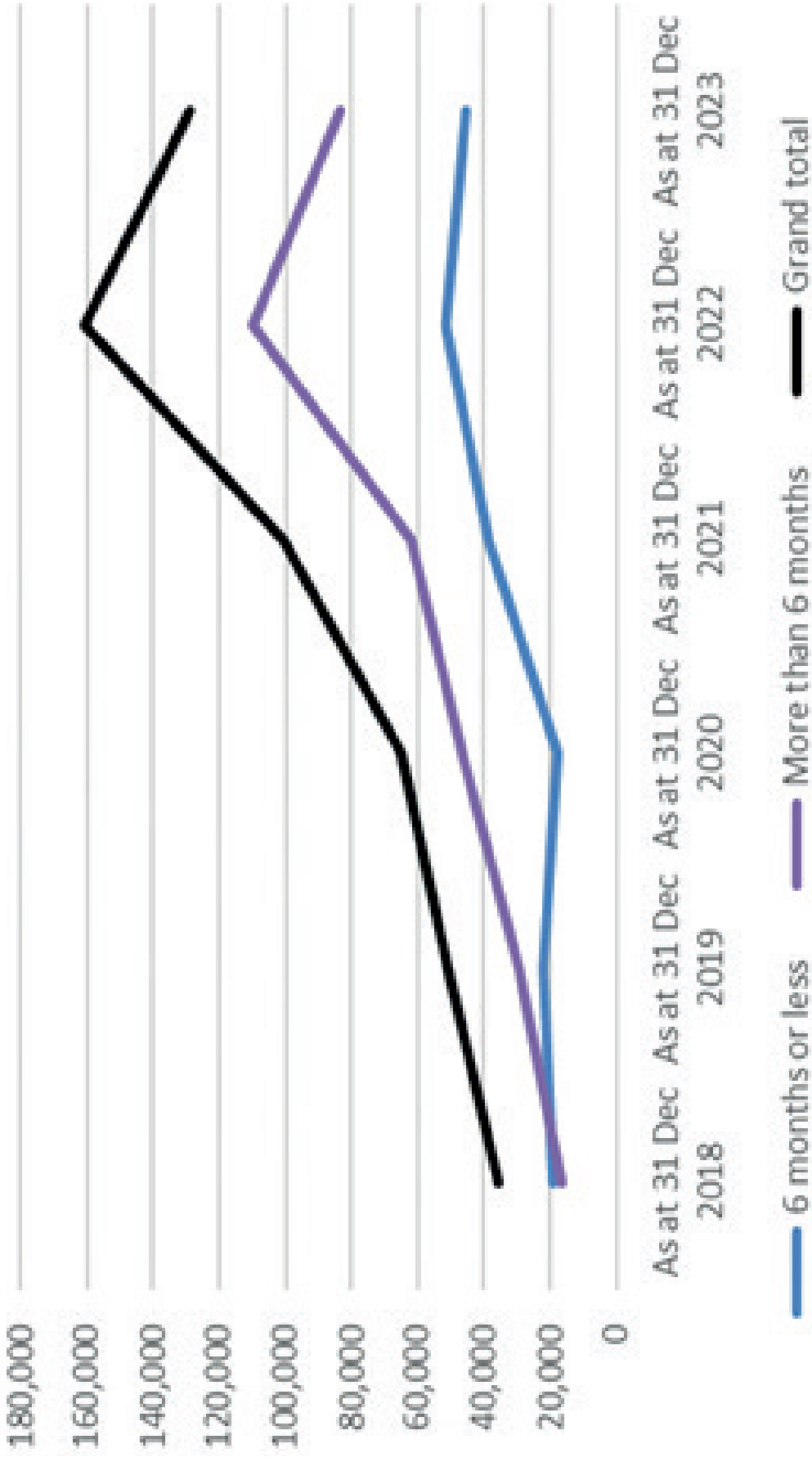
1.22 As of December 2023, 111,000 individuals were in receipt of asylum support, of whom 106,000 were provided with accommodation by the Home Office.²⁴ The number of asylum seekers housed in contingency and initial accommodation has increased as the number of individuals arriving in the UK and the number of applications for asylum have risen.²⁵ This situation has been exacerbated by other factors, including delays to making decisions on claims, resulting in claimants remaining in asylum accommodation for extended periods of time, and exhaustion of the available supply of dispersal accommodation, compounded by the wider shortage of housing in the UK.²⁶ See figure 6 below.

24 House of Commons Library, 'Estimates Day debate: The spending of the Home Office on asylum and migration' (published 11 March 2024), p. 13. <https://commonslibrary.parliament.uk/research-briefings/cdp-2024-0054/>

25 <https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables#asylum-and-resettlement>

26 <https://commonslibrary.parliament.uk/research-briefings/cbp-7671/>

Figure 6: Asylum applications awaiting decision from December 2018 to December 2023



Opening and closing of CAA sites

- 1.23** The ICIBI's 2021 inspection of CAA found that, in December 2020, the Home Office and its three accommodation providers had begun to implement a recovery plan to reduce dependency on hotels. This was to be through rapid procurement of dispersal accommodation via the AASCs. An initial target date for exit from hotels was set for May 2021. This was subsequently extended to March 2022. Both dates proved to be unrealistic. It was not until 29 September 2023, in a submission to ministers, that senior civil servants proposed an "initial hotel exit plan" to close the first 100 hotels "over a manageable period of time".
- 1.24** The opening of new CAA sites mirrors the increase in small boat arrivals and asylum applications, delays in decision making, and the partial breakdown of the dispersal model. Of the 415 sites in use at the time of this inspection, two were opened prior to 2020, and two in January 2024 (see figure 7).

Figure 7: Number of CAA sites opened

Date CAA site opened	Number of CAA sites opened
Prior to 2020	2
2020	39
2021	110
2022	172
2023	89 ²⁷
2024 (to the end of January)	2
No opening date supplied	1
Total number of CAA sites	415

1.25 The Home Office supplied data regarding the expected closure dates for hotel sites. One list, provided in January 2024, reported that 33 sites were scheduled to close by April. A later list, provided on 2 February 2024, showed that there were now 53 sites that were due to close by May 2024. The Home Office also provided data in relation to 415 sites, of which 67 were initial or dispersal accommodation. Inspectors were told that there were 71,629 bedspaces, but the Home Office qualified this explaining that the accommodation providers were not required to report the capacity of initial and dispersal accommodation, only the occupancy. The occupancy figure provided for the 415 sites by the

²⁷ This includes Wethersfield and the Bibby Stockholm, opened in July and August respectively.

Home Office was 47,857.²⁸ Further details of the location of CAA sites and their total occupancy broken down by Strategic Migration Partnership region and service provider are shown at Annex D.

28 The figures in Figure 7 include accommodation recorded by the Home Office as initial or dispersal as well as contingency. Of the 415 sites, the Home Office identified 67 as initial or dispersal. In its factual accuracy response, the Home Office clarified that in locations where there are no fixed initial accommodation sites the accommodation providers can place people in receipt of S.98 support (people awaiting an eligibility assessment) into available dispersal accommodation. That address is then occupied on an “initial accommodation” basis until the service user is granted S.95 support, when it reverts to dispersal accommodation, without the need for the occupant to relocate. The Home Office also explained that initial and dispersal accommodation is contracted under different arrangements from contingency accommodation, and that the closure programme was not intended to target initial or dispersal sites. It also pointed out that the data provided was taken from live operational records and therefore subject to change.

2. Key findings

The costs of 'large sites' versus hotels

- 2.1** In early 2023, in the interests of speed, Home Office ministers approved the suspension of normal governance processes for the development of alternative sites to hotels for use as contingency asylum accommodation. This included not requiring a costed business case for the Large Sites Accommodation Programme (LSAP) until after spending decisions were made.
- 2.2** In March 2024, the National Audit Office (NAO) published the report of its investigation into asylum accommodation, which concluded that the Home Office had made progress in its plan to reduce the use of hotels but, in rapidly progressing its plans to establish large sites, had incurred nugatory spending and increased risk, and that, collectively, the early sites (Wethersfield and the Bibby Stockholm) would cost more than the alternative of using hotels.²⁹ The Independent Chief Inspector

29 National Audit Office, 'Investigation into asylum accommodation' (published 20 March 2024). <https://www.nao.org.uk/reports/investigation-into-asylum-accommodation/>

of Borders and Immigration's (ICIBI's) findings are entirely in line with this.

2.3 The NAO and the Public Accounts Committee have queried the Home Office's understanding of the potential costs and value for money (vfm) of large sites.³⁰ The Home Office had sought to compare the vfm of the large sites and vessels and hotels using 'per-person-per-night' costs over the life of the site. However, the per-person-per-night calculations were seriously impacted by fluctuating hotel costs and by the lower-than-anticipated capacity and occupancy at Wethersfield and the Bibby Stockholm barge, due to a number of operational challenges. Some of these were outside the Home Office's ability to predict or control; others could and should have been foreseen. But a combination of the ministerial requirement to deliver at pace, the absence of effective oversight, and the lack of a clear vision and strategy for asylum accommodation meant that the Home Office did not consider fully the risks and consequences involved in establishing large sites and vessels.

30 Committee of Public Accounts, 'Asylum Accommodation and UK-Rwanda partnership' (published 29 May 2024). <https://publications.parliament.uk/pa/cm5804/cmselect/cmpubacc/639/report.html>

- 2.4** In early 2023, the Home Office did recognise an issue with bedspaces and occupancy levels in hotels. In response, 'Project Maximise' looked to increase the total number of bedspaces available in hotels managed by the three asylum accommodation service providers. It did this by reconfiguring rooms from doubles to twins, increasing the amount of room sharing, and more robust monitoring of the management of unoccupied bedspaces. By the end of December 2023, the project had achieved more efficient use of the considerable spare capacity in the existing hotels, with 11,839 bedspaces filled or created at existing hotels.
- 2.5** A further benefit of Project Maximise was that it enabled the Home Office to begin to reduce the number of hotels it was using. In October 2023, it began a programme of hotel closures, targeting an initial tranche of 50 closures by January 2024, with further tranches to follow. By the beginning of June 2024, the total number of closures was 159 (with a further 32 in progress and due to be closed by the end of August 2024). The reduction in the number of hotels was possible due in part to moving some people to large sites, and, the NAO found, by increasing the amount of dispersal

accommodation and by making more asylum decisions.³¹

2.6 As noted by the NAO in its report, the Home Office acknowledged that to secure the use of large sites quickly, including the Bibby Stockholm, its engagement with local stakeholders was “limited”. In the case of Wethersfield and Scampton, it invoked emergency planning regulations. Predictably, when its plans became known, there was considerable opposition both locally, to the particular sites, and nationally, including to the suitability of this type of accommodation for those seeking asylum. This included legal challenges. Since then, the Home Office has looked to build effective working relationships with local stakeholders, including providers of key services such as healthcare, through multi-agency meetings, and by creating onsite capabilities and providing some funding to reduce the burden on local services and communities. It has had mixed success.

Stakeholder engagement

2.7 Since 2022, the Home Office has established strategic and operational engagement structures for asylum accommodation and support, and also

31 Dispersal accommodation and asylum decision making were outside the scope of this inspection.

developed a standard approach to engaging local stakeholders when ministers have approved the use of a hotel or large site. As at early 2024, it had provisionally discussed but not yet established ‘forums and deep dive groups’ to consider, among other things, community cohesion, safeguarding, and contingency and scenario planning. The present structures work at different levels (including ministerial) and to different cycles (biannually to monthly, and ad hoc), but they share broadly the same aims: to inform, reassure and secure support from stakeholders. Nonetheless, local authorities who had been through the engagement processes for the setting-up and operation of hotels and other sites expressed concern to inspectors about the lack of meaningful consultation by the Home Office.

2.8 Lack of meaningful engagement with stakeholders and poor communication (‘one- way’, telling rather than listening) by the Home Office’s Migration and Borders System (and its forerunners) about policies, practices and plans has been a recurring theme of inspections over many years. Here, the department has recognised the importance of engaging and communicating with those stakeholders on whose active support it is reliant, and reported good progress locally, at Portland, for example.

2.9 Meanwhile, it has been much less effective in engaging constructively with some of the more critical stakeholders, including some non-governmental organisations (NGOs) who have been providing direct support to individuals in contingency asylum accommodation. While some are opposed in principle to the department’s approach to accommodating asylum seekers, with common ground hard to find, it is clear that the Home Office still has a long way to go with potential partners and critics alike to build trust and confidence in its willingness to be open and honest about its intentions and performance, and any reluctance to share information, whether real or perceived, will be seen as evidence that it is not.

Organisational learning³²

2.10 From its launch in July 2023, the LSAP was under pressure to deliver at pace. The potential sites

32 In June 2024, inspectors asked for an update. The Home Office provided evidence of work it had done to ensure that it was learning lessons in respect of contingency asylum accommodation, including a presentation dated May 2024 with “lessons learned work completed in the past few weeks and future plans and scope for the work”. These were captured in a tracker, a copy of which was also provided, with “a dashboard that analyses the data and gives a high-level overview of all

it identified were ‘new’ to the Home Office and each had their own unique challenges. But, in 2020 the department had stood up two former military camps, Napier Barracks in Folkestone, and Penally Camp in Pembrokeshire, for use as contingency asylum accommodation. Penally Camp had closed in 2021, but Napier Barracks remained in use and, as at 16 January 2024, housed 311 single males.³³ The Home Office had therefore had recent experience of this type of venture, and especially of the pitfalls.

2.11 However, the Home Office appeared slow to draw on the lessons from the setting-up and operation of these precursor sites, or from the failed plan in 2022 to convert the disused RAF station at Linton-on-Ouse, North Yorkshire, for use as an asylum

lessons captured and a view of each site, key themes, whether lesson is positive or negative and whether we have learned from the lesson or not.” The presentation refers to 942 lessons having been identified, three-quarters of which relate to a negative impact. Of the 942, 817 had been learned, with the others still being investigated. 25 key themes had been captured, including learnings taken from litigation, planning, communications with local partners, policy decisions and operationalising sites. The intention was to embed this approach as ‘business as usual’ from September 2024.

33 As at 1 July 2024, there were 276 men at Napier Barracks, with a further 40 due to arrive imminently.

reception centre. Had it done so earlier, it might have responded more efficiently and effectively to some of the operational challenges faced at Wethersfield and the Bibby Stockholm barge, including ensuring regulatory compliance, seeking early and open engagement with local services providers and the local community, and providing purposeful activities for the residents as well as support for their mental wellbeing.

2.12 A similar criticism applies to its use of hotels. Since October 2023, there has been notable progress with maximising the use of empty bedspaces in hotels and closing those hotels that are surplus to requirements. But the Home Office had been operating with hundreds of hotels for well over a year at that point and should have been quicker to identify and tackle the evident problems with capacity and occupancy.

The asylum accommodation strategy

2.13 The then Prime Minister set out his intention to reform the asylum system in December 2022. This included implementing an asylum accommodation strategy that would reduce the reliance on hotels as contingency accommodation and include use of alternative sites such as surplus military facilities, and former student halls, to create 10,000 new bedspaces initially (by June 2024), with more to

be planned, “at half the cost of hotels”. Clearly, the latter had not been achieved with the early sites.

- 2.14** In December 2023, the Home Office was still in the process of drafting a ten-year strategy for asylum accommodation, which was to be developed by the end of March 2024.³⁴
- 2.15** In respect of the LSAP, inspectors were told that “approximately 900 [large] sites” had due diligence completed, but the Home Office provided a list of just 64 sites that “were visited and subsequently discounted”.
- 2.16** In February 2024, a draft business case for the Asylum Accommodation Programme was produced. It contained some key changes of direction since the previous iteration in September 2023, including securing sites for families as well as single adults; considering provision of wraparound services for future sites; reducing the target of 10,000 beds by June 2024 to 6,500 by December 2026; and looking at acquiring smaller sites as well as continuing with large ones.

34 In its factual accuracy response, the Home Office explained that the strategy was not intended to take effect from April 2024. Implementation would require further development of the themes identified and would be subject to ministerial approval.

Leadership and management

- 2.17** The ICIBI and others have previously pointed to the negative effects of the high turnover of senior staff and frequent restructurings within the Home Office. In the case of the Asylum Support, Resettlement and Accommodation directorate (ASRA), there had been numerous changes in the senior team during the period covered by this inspection. This, together with a lack of clarity around ownership and accountability at senior levels, led to inefficiencies, duplication of effort and learning not being shared, undermining ASRA's ability to navigate the complex landscape and challenges it faced effectively.
- 2.18** In 2022, the Home Office had recognised it did not have all of the capabilities it needed in-house for some roles within ASRA, and it brought in a number of contracted staff with the skills and experience it saw as missing. Given the pressures to deliver at pace, this was pragmatic, but it raised the question of whether the department was investing enough in the development of its permanent staff to build corporate knowledge and ensure consistency and continuity in an area it acknowledged would be strategically important for at least five to ten years. Some senior managers were concerned about this, and about whether the contracted staff actually had the skills the department required.

Assurance processes

- 2.19** The contracts the Home Office has agreed with its asylum accommodation providers rely on the providers to report monthly on their performance against a set of agreed Key Performance Indicators (KPIs). In essence, this self-reporting system is the same as the one that existed under the previous accommodation contracts. With regard to assurance, the ICIBI recommended in 2018 that, before letting new asylum accommodation contracts, (in 2019) the Home Office should ensure that it had the capacity and capabilities to carry out effective contract compliance inspections. In 2021, the ICIBI's inspection of contingency asylum accommodation further recommended a programme of quarterly intelligence-led inspections. Both recommendations were accepted in full.
- 2.20** The ICIBI's 2021 inspection noted that the assurance strategy was set out in the 'Service Delivery and Contract Assurance Framework' and was based on a 'three-line-of-defence' assurance model.³⁵ This document was provided again in evidence for the current inspection and did not

35 ICIBI, 'An inspection of contingency asylum accommodation' (published 12 May 2022). <https://www.gov.uk/government/publications/an-inspection-of-contingency-asylum-accommodation>

appear to have been updated or changed. First-line assurance was identified as the responsibility of the Home Office's Accommodation and Support Contracts – Assurance (ASC-A) team. It was to be delivered through assurance visits to contingency asylum accommodation “as much to assure that the service providers are undertaking their inspections and carrying out their processes correctly, as they are to identify defects and issues in the properties”.

2.21 The Home Office's task of checking that the providers are meeting their contractual obligations, and that the safeguarding of 'service users' is being managed appropriately, has undoubtedly been made much harder by the significantly expanded use of contingency asylum accommodation and far larger population of service users. In addition, the KPIs were drawn up with asylum dispersal accommodation largely in mind, and the Home Office has not negotiated and agreed new KPIs that reflect its particular requirements at long-stay hotels.³⁶ Nonetheless, the substance of ICIBI's 2018 and

36 In its factual accuracy response, the Home Office reported that it had negotiated and agreed new KPIs for the delivery of Vessel Accommodation Services on the Bibby Stockholm in February 2024, while “standard AASC KPIs are used to assess service provider performance at Wethersfield”.

2021 recommendations remains valid, and it would appear that others agree. In February 2024, London Councils wrote an open letter to the Home Affairs Select Committee stating that they “would welcome an examination of the capacity and outcomes of the Home Office Assurance Team”.

- 2.22** In fact, this inspection found that the Home Office’s capacity to carry out assurance activity at hotels was severely limited. Some of the sites inspectors visited had not had a visit from the ASC-A team, despite being used to accommodate large numbers of people, families with children and individuals with disabilities. Additionally, where ASC-A team assurance visits had taken place, very few potential non-compliance issues had been followed up. The ASC-A team’s remit did not extend to Napier Barracks, Wethersfield or the Bibby Stockholm barge. However, inspectors could find no documentary evidence of onsite Home Office staff carrying out their own assurance checks at these sites.
- 2.23** The service providers’ self-reports indicated a zero or very-low level of not meeting their KPIs. However, inspectors found that their self-assurance activities and monthly self-reports were not robust. The Home Office appeared to recognise that this was a problem. In November 2023, the ASRA risk register highlighted an “inability to deal with provider non-compliance

in relation to [one provider's] AASC contract", indicating a concern that the latter's self-reports failed to reflect areas of underperformance, including "extensive overcrowding, non-compliance with licensing requirements and sharing rules, and questionable maintenance in the [provider's] estate".

2.24 Although remedial action was being taken to work with the provider in question to improve its performance, it was "likely formal default action and/or dispute processes" would be needed. However, Home Office staff reported that few, if any, service credits had been applied to Asylum Accommodation and Support Contracts (AASCs), which was a further indication of the difficulty the department had in holding the providers to account for their performance.³⁷

2.25 For reasons of expediency, the existing AASCs were routinely amended via Change Control Notices, enabling the providers to deliver the operation and maintenance of new sites without the formal reconsideration of requirements and KPIs. While the Home Office's options may have been limited, and it needed to move swiftly, by not tendering for new contracts it lost the

37 Service credits are applied where a deduction from the cost of the contract is made, in response to a service provider's failure to meet performance standards.

opportunity to press for better value and better performance either with the existing providers or with new ones.³⁸

Management information and record keeping

2.26 As previous ICIBI inspections have found in many other areas of the Migration and Borders System, this inspection found the Home Office's management information (MI) in relation to contingency asylum accommodation was both limited and unreliable. The case records for individuals who had claimed asylum were held on the department's caseworking system, ATLAS. But limitations in its functionality meant it could not be used to generate MI reports. This issue was compounded by the use of multiple datasets, including the providers' invoicing system, that the Home Office had not consolidated effectively, but on which staff were reliant to record and

38 Separately, the NAO report noted that the Home Office had used contracts with a total value of £254 million to identify, design, and operate large sites, comprising £244 million awarded without full competition and £10 million fully competitive awards.

report data on different aspects of contingency accommodation.³⁹

2.27 The Home Office’s record keeping regarding both service provision and service users was problematic. In January 2024, inspectors requested data about the number of contingency accommodation sites in use and the total number of bedspaces. The Home Office provided data for 415 sites, including 15 initial and 52 dispersal accommodation addresses. The latter were sites where service users had been placed immediately into “longer-term dispersal accommodation”. It provided a figure for occupancy at the 415 sites but could not provide a total for capacity as the department “pays on a per person per night basis and does not contract capacity [at the 67 initial and dispersal sites] and sites are not fixed in the same manner as contingency accommodation sites”.

39 In its factual accuracy response, the Home Office explained: “ATLAS is the system of record for cases – its primary function is not intended to manage attributes of properties. Whilst all cases/claimants have an address held on ATLAS, current MI capability of ATLAS means ATLAS is not well suited to report on features of properties requested by the inspection. The referenced ‘invoicing system’ is not an ‘IT system’ but one of a suite of data sets and processes that in fact reconcile against ATLAS records.”

- 2.28** For service users in contingency asylum accommodation, the Home Office requires the service providers to keep up-to-date records of addresses and any safeguarding concerns. However, it was unclear how the Home Office was ensuring that any individual vulnerabilities were being identified and actioned appropriately, or how it would know if there were issues for particular cohorts at a given site. The Home Office also appeared to have difficulty ensuring that individuals who have received an asylum decision are moved on within the required 21-/28-day grace period, with appropriate help.
- 2.29** Overall, the data that the Home Office holds and the management information it generates in relation to service users and asylum accommodation (not solely contingency accommodation) is not fit for purpose. It is easy to blame this on IT, the functionality of which is admittedly an issue. However, more fundamentally, the problem is a failure to recognise that effective decision making at every level (strategic, operational, case-specific) relies on maintaining detailed, accurate, up-to-date, retrievable records.

Allocation of asylum seekers to accommodation

- 2.30** The Home Office has always been clear that the overriding principle when allocating asylum

accommodation is that it is offered on a ‘no choice basis’. The accommodation service providers are responsible for deciding the allocation of individuals to hotel and hostel-type accommodation, for which there is no formal guidance. Neither did inspectors find evidence of any specific training, policies, procedures, and processes for service provider or subcontractor staff to follow that would enable routing decisions to be robust and assured. Meanwhile, the ‘Allocation of asylum accommodation policy’ includes a suitability ‘test’ for individuals (men between the ages of 18 and 65) who stand to be moved into former Ministry of Defence sites, vessels or Napier Barracks. The policy also applies to an individual’s suitability to remain in such accommodation.

2.31 Stakeholders have raised concerns about suitability assessments. Inspectors did not examine individual cases but noted that Home Office staff were instructed to consider information held on ATLAS, including information recorded from the screening interview, and “any notes taken from Manston and Western Jetfoil”. This raised concerns about whether the initial screening process was as effective as it needed to be at identifying and flagging up vulnerabilities. A Home Office manager told inspectors that some individuals may not disclose certain circumstances upon arrival in the UK and so their non-suitability

for a large site would only be detected once they are placed there. While true, there was no systematic follow-up of initial suitability assessments.

2.32 As of 8 February 2024, 217 individuals had been removed from Wethersfield for ‘suitability reasons’ since it opened on 12 July 2023, and 12 had been removed from the Bibby Stockholm barge since it opened on 8 August 2023. Between July and December 2023, 50 individuals had been removed from Napier Barracks for suitability reasons. The Home Office had not attempted to record and analyse the reasons why individuals were being reassessed as ‘unsuitable’ after moving them to one of these sites (or why some people were assessed as unsuitable and not moved there in the first place), so there was no process of learning and feedback to those responsible for making such decisions. However, in the case of Wethersfield, the Home Office had removed some individuals without carrying out a detailed review of their circumstances because it had limited capacity to deal with legal challenges made on their behalf.⁴⁰

40 Home Office, ‘Allocation of asylum accommodation policy’ (published 21 January 2015, last updated 3 May 2024). <https://www.gov.uk/government/publications/asylum-accommodation-requests-policy>

2.33 In June 2024, staff at Wethersfield said that 13 individuals had been removed after disputing that they were adults (18 or over). Inspectors were told that the rate of age disputed cases in hotels was much higher.⁴¹

Service user experience

2.34 Different stakeholders, and service users themselves, have different views about what constitutes an acceptable standard for contingency asylum accommodation, in terms of such things as room size, decoration, amenities, location etc. For this reason, inspectors did not look to measure the accommodation they visited against a set standard. However, it was evident that the quality of the accommodation varied significantly between different sites.

2.35 Inspectors visited Wethersfield, the Bibby Stockholm, large independent hotels, chain hotels, and hostel-type properties. They found some service users living in spacious rooms with en suite facilities, while others were in dormitory rooms which accommodated a dozen people, with limited storage space and shared showering and toilet facilities. In general, the visited sites were clean and habitable, but this was easier to

41 In June 2024, the ICIBI began an inspection of the Home Office's management of age disputes.

maintain where the accommodation was newly built or recently refurbished, as were parts of Wethersfield and the Bibby Stockholm, and harder where buildings were old and well-worn, as at Napier and some hotels.

2.36 The most common complaint voiced by service users about their accommodation concerned the quality and variety of food provided. At the sites inspectors visited, provision was made for special dietary, cultural, or religious requirements; portion sizes were adequate, and snacks were available outside set mealtimes. However, stakeholders have raised concerns about food provision for pregnant women and families. As much as the complaints were about the food itself, this was an example of service users feeling controlled and having no sense of agency, other than not to eat the food provided. At most sites, there was no opportunity for them to cook for themselves. In June 2024, on visits to the Bibby Stockholm and Napier Barracks, the Independent Chief Inspector (ICI) heard of efforts to involve service users more in setting the menus for meals. Some service users said that the food had improved, however, they acknowledged that as they came from many different countries and cultures it was difficult to please everyone.

2.37 Service users at Wethersfield and on the Bibby Stockholm barge highlighted their concerns

about the remoteness of these sites and the detrimental impact this had on their mental health. At Wethersfield, this had been compounded by a lack of purposeful activities, which had contributed to boredom and unrest among service users. Transport had been laid on to and from neighbouring towns to take those who wanted to go, but there was little they could do when there, not least as they had little or no money.

2.38 Inspectors did see examples of creative approaches to the delivery of activities at a local level, and a range of activities, including sports, educational opportunities, barber shops and a ‘cottage garden’, were provided across the sites that were visited. However, good practice was not always captured and shared with other sites, and it was not evident that anyone within the Home Office was grasping this.⁴²

2.39 Access to healthcare was inconsistent. At Wethersfield, the Bibby Stockholm and Napier there were varying levels of onsite healthcare services, in some cases supplemented by

42 The then ICI, David Neal, wrote to the Home Secretary with his concerns about the lack of purposeful activities at Wethersfield on 20 December 2023 and followed this with a letter to the Minister for Legal Migration and the Border, on 9 February 2024. These letters are at Annexes F and G.

mobile clinics provided by NGOs (in the case of Wethersfield, by Doctors of the World (DoW) and Médecins Sans Frontier (MSF) had set up outside the camp and were providing primary health care, and in the case of Napier an onsite dental clinic operating on certain days a week). Hotels were generally reliant on existing local NHS services, even though some were accommodating similar numbers of service users as the large sites.

2.40 In May 2024, DoW-MSF produced a report based on their work at Wethersfield, which highlighted a “mental health crisis”. DoW-MSF repeated their concerns to the ICI in July 2024. In 2023, the Home Office had commissioned research into how best to support asylum seekers’ mental health and wellbeing in asylum accommodation, but as at the beginning of 2024 it did not have an agreed strategy for mental health support and purposeful activity. Counter-intuitively, when it revised its ‘Allocation of asylum accommodation policy’ in February 2024, Wethersfield, the Bibby Stockholm, Napier Barracks, and RAF Scampton were no longer deemed “not suitable” for those at a “high risk of suicide” but, instead, “may not be suitable”. This was despite the loss of life on the Bibby Stockholm in December 2023 due to a reported suicide. This is clearly an area where the knowledge and expertise lie outside the Home Office, and the department needs to ensure it is engaging effectively with the appropriate bodies.

- 2.41** Uncertainty about how long they were going to have to stay at a particular location and what was happening with their asylum claim was a primary cause of stress and anxiety for service users, especially those at Wethersfield and the Bibby Stockholm. It was noticeable how different the mood was there compared with Napier, where the service users knew that they would be moved on to dispersal accommodation within 60 to 90 days. At Wethersfield, it was apparent that the lack of information about asylum claims had led to tensions between service users and Home Office staff.
- 2.42** None of the staff working at contingency asylum accommodation sites, whether for the accommodation provider, its subcontractors, or for the Home Office, was able to provide any information about an individual's asylum claim. The Home Office staff consistently highlighted the lack of updates on service users' asylum claims as a major source of frustration and detrimental to service users' wellbeing. Accommodation provider and subcontractor staff reported that they felt helpless in supporting service users, as they were not familiar with the asylum process and were therefore unable to alleviate any concerns. Migrant Help were present on site at Napier but not elsewhere at the time of the inspection, though there were plans for them to be onsite at

Wethersfield.⁴³ But their remit under the Advice, Issue Reporting and Eligibility (AIRE) contract does not extend to providing updates on individual claims. The ICIBI previously drew attention to this issue in 2021, since when it would appear no meaningful progress has been made.⁴⁴

Safety and security

2.43 All of the accommodation sites that inspectors visited looked to provide at least a basic level

43 In its factual accuracy response, the Home Office noted that Migrant Help staff were based at “core initial accommodation sites in Glasgow, Belfast, London, Cardiff, Coventry, Birmingham, Liverpool, Wakefield and Derby during business hours”. The Home Office also commented: “Following previous ICIBI feedback, Migrant Help does now have access to asylum support decision outcomes and an escalation route which allows them to provide updates on the progress of asylum support applications.”

44 David Bolt, ICI (2015 to 2021), drew attention to this issue in a letter to the Director General Asylum and Protection dated 21 March 2021, which was published in July 2021 in ‘An Inspection of contingency asylum accommodation : HMIP report on Penally Camp and Napier Barracks’. <https://www.gov.uk/government/publications/an-inspection-of-contingency-asylum-accommodation-hmip-report-on-penally-camp-and-napier-barracks>

of safety and security for service users. The challenges were different at different sites, as were the solutions. The size and make-up of the service user population at each site was also relevant. Wethersfield, the Bibby Stockholm, and Napier Barracks housed only single adult males, numbered in hundreds. This created different safety and security challenges from those hotels that were housing families with small children, or single adult women, which were different again where families, women, and single adult males were accommodated in the same hotel. Realistically, the Home Office and the accommodation providers were not able to anticipate every challenge, so inspectors focused on whether there were systems in place to learn quickly and avoid repeating mistakes.

2.44 There were specific health and safety risks at Wethersfield and the Bibby Stockholm that had not been fully considered before service users were moved in, in the latter case requiring everyone to be removed from the barge due to the presence of legionella in the water system. The Home Office was working at pace to operationalise these sites, but it should not have allowed them to be occupied before all necessary health and safety risks had been addressed and assurance processes established.

- 2.45** Inspectors shared the concerns of some service users, staff, and stakeholders about the incidents of disorder and violence at some locations, particularly sites housing large numbers of service users, but also at some hotels. The nature and location of Wethersfield, the Bibby Stockholm barge, and Napier Barracks meant that site security there was more evident and intrusive than at hotels, with perimeter fences and security staff controlling entry and exit. (Some hotels had the latter, though on a much smaller scale.) Understandably, despite the fact that service users could come and go (within certain hours) some described these sites as “like a prison” and, for those who had spent time in a prison before coming to the UK, the experience was triggering.
- 2.46** On a day-to-day basis, the safety and security of everyone living or working at any contingency asylum accommodation site, and of the surrounding community, rely on a number of parties, including the Home Office, service providers and subcontractors, the police, local authorities and other services. To avoid things falling between the cracks, it requires a joined-up approach, with clear guidelines and standards to be set and agreed, and defined responsibilities.
- 2.47** But, while others may manage and deliver what is required, the Home Office needs to recognise that it remains ultimately accountable. In mid-2023, a

Government Internal Audit Agency (GIAA) audit identified that record keeping of health and safety incidents needed to improve. The department's recent responses to inspectors' requests for information confirmed that this remained the case one year on, and this extended to records of safety checks, security incidents (including where these involved the police) and outcomes, and the whereabouts of service users (if signing in and out is required, it needs to be properly managed). Without better records, it is hard to see how the Home Office can identify trends or issues that require attention, and how it can show that it is meeting its responsibilities for the safety and welfare of contingency asylum accommodation service users.

3. Recommendations

The Home Office should:

1. Ensure that the **ten-year strategy and annual delivery plans** for asylum accommodation are informed by:
 - a. clearly stated milestones for expected benefits, overall and broken down by type of accommodation (initial, dispersal, contingency) and by site
 - b. a standardised methodology, for each type of accommodation being provided, including planning assumptions (e.g., occupancy rate, length of stay) to enable clear and consistent costings and value for money assessments for each site.
2. Improve **stakeholder engagement** in relation to the whole of the asylum accommodation estate (initial, dispersal, contingency) by:
 - a. creating stakeholder ‘maps’ identifying the key stakeholders (overall and broken down as above), their responsibilities, interests and likely concerns (to be kept under review), and the Home Office’s aims and objectives in relation to each (e.g., provision of services, other forms of support, management of expectations)

- b. establish a system and schedule for engagement with local and national stakeholders for each contingency asylum accommodation site to exchange information, ideas, and challenges at every stage of the procurement process and throughout the lifetime of its use; this should include consideration of the site's suitability, contract completion, set-up, opening, 'business-as-usual' operation, and withdrawal and closure
3. Strengthen **governance arrangements** for the management of asylum accommodation, including proposed and existing large and medium-sized contingency accommodation sites, by ensuring that:
- a. lines of reporting and accountability are clearly documented, and any gaps or ambiguities are resolved
 - b. the skills and experience required by staff responsible for managing contracted providers and large projects are clearly articulated, and where necessary further training is provided, and that a development pathway is identified for Home Office staff who may wish to fill such roles in future

4. Overhaul **contract compliance and assurance checks** by revisiting the relevant recommendations from ICIBI’s 2018 and 2021 inspections of asylum accommodation and, in light of these:
 - a. review the department’s approach to assurance for all types of asylum accommodation and develop a consistent model, including minimum acceptable levels and maximum intervals between assurance checks at each type of accommodation (initial, dispersal, contingency (large and medium-sized sites), hotels, other sites)
 - b. review the key performance indicators (KPIs) in the Asylum Support and Accommodation Contracts (AASCs) to ensure that they align with and inform the new assurance regime

5. Improve **record keeping and data quality** by agreeing the requirements and minimum standards for information and data recorded by the Home Office and by the accommodation providers (and subcontractors) relating to asylum accommodation and service users, by:
 - a. developing a single, interrogable database of contingency asylum accommodation sites and service users that holds:
 - i. the current location (site and block or room number) of each ‘service user’ with a “since date”

- ii. the current occupancy and availability of bedspaces at each site
 - b. defining a data assurance regime with accommodation providers to ensure that record keeping is in line with the agreed requirements and standards, with the objective that Home Office and contractor records are fully reconcilable at all times
- 6. Define roles and responsibilities (Home Office, accommodation providers, others) in respect of providing **purposeful activities** (e.g., education, recreational activities, volunteering opportunities) for service users in contingency asylum accommodation and establish a means of sharing ideas and 'best practice'
- 7. Improve the **safeguarding** of vulnerable asylum accommodation service users by:
 - a. seeking input regarding its current policies and practices from agencies and organisations with knowledge and experience of dealing with vulnerable and at-risk individuals
 - b. clarifying with accommodation service providers (and subcontractors) the processes for identifying and risk-assessing such individuals in contingency asylum accommodation

- c. documenting the decision-making processes and criteria used to place individuals in, or remove them from, specific sites
 - d. ensuring that families with children are not housed in the same contingency asylum accommodation as single adult males or females
8. Strengthen **organisational learning** in relation to asylum accommodation by producing a framework, with associated processes and guidelines, for capturing, evaluating and sharing learning ('best practice' and pitfalls) from 'business as usual' and from new projects, including the findings and recommendations from inspections and reviews
9. Improve **communication with asylum seekers** by:
- a. (as soon as is practicable) establishing mechanisms for informing asylum seekers of the progress of their claim through Home Office-generated updates (e.g. GOV.UK "current average waiting times", text messages, letters) or on request (e.g., via a 'hotline')
 - b. (now) providing service users in contingency asylum accommodation the likely length of their stay, what to expect next, and giving them reasonable notice (at least 48 hours) when they are being moved to alternative accommodation, and an explanation of why this is happening

4. Scope and methodology

4.1 This inspection focused on the Home Office's use of contingency accommodation for asylum seekers, including:

- its strategic approach
- its assurance processes
- consistency of services and conditions

4.2 Inspectors undertook the following activities:

- reviewed open-source material, including published reports
- held a familiarisation meeting with the Home Office on 23 November 2023
- requested documentary evidence and data from the Home Office and analysed almost 200 documents provided
- analysed 13 submissions provided to the Independent Chief Inspector of Borders and Immigration (ICIBI) by stakeholders
- attended a meeting of the ICIBI's Strategic Migration Partnerships Forum on 13 December 2023
- visited 27 hotels used for contingency asylum accommodation between 18 December 2023 and 26 January 2024

- visited the Bibby Stockholm barge, Napier Barracks, and Wethersfield between 18 December 2023 and 26 January 2024
- visited the proposed accommodation sites at Manchester Road, Huddersfield, on 9 January 2024 and at RAF Scampton on 23 January 2024
- held in-person interviews with accommodation provider staff/managers and hotel staff/managers between 18 December 2023 and 26 January 2024
- undertook 28 virtual interviews with Home Office staff between 4 January and 25 January 2024
- held a feedback session with Home Office senior management on 31 January 2024, sharing initial thoughts and indicative findings from onsite activity

4.3 This inspection report was drafted in February 2024 and was due to be sent to the Home Office for factual accuracy checks in March 2024. However, between 20 February and 3 June 2024 there was no Independent Chief Inspector (ICI) in post, which meant it was not possible to share the report with the Home Office. Upon appointment of an interim ICI in June 2024, inspectors requested updates from the Home Office on some of the

information provided in this report. Where updated information was provided, this has been included.

4.4 This report was sent to the Home Office on 1 August 2024 for factual accuracy checking prior to submission to the Home Secretary for laying before Parliament.

5. Inspection findings: Strategic approach and value for money

Strategic approach to asylum accommodation

- 5.1** In his December 2022 statement on illegal migration, the then Prime Minister set out his intention to reform the asylum system, including implementing an asylum accommodation strategy that would reduce the government’s reliance on hotels as contingency accommodation. This approach was to include use of alternative sites such as surplus military facilities, and former student halls, to create 10,000 new bedspaces, initially by June 2024, with more to be planned, “at half the cost of hotels”.⁴⁵
- 5.2** In December 2023, inspectors requested a copy of the Home Office’s strategy for asylum accommodation and were informed that a ten-

45 Prime Minister’s Office, ‘Prime Minister’s statement on illegal migration: 13 December 2022’ (published 13 December 2022). <https://www.gov.uk/government/speeches/pm-statement-on-illegal-migration-13-december-2022>

year strategy was being drafted, which would be developed by the end of March 2024.

5.3 Inspectors asked senior officials how the department's work on asylum accommodation is prioritised and what informs delivery, in the absence of an overarching vision and strategy. A senior civil servant told inspectors:

“There was a clear strategic decision [to get out of hotels], but the plan on how to deliver was not as clear... the imperative was to avoid Manston being overcrowded again and take all decisions necessary to stop that happening. There was no real focus on costs or quality, which there should have been.”

5.4 A senior manager confirmed the negative impact of the absence of a strategy on their team, reflecting that:

“we didn't have the established culture, with a strategy and plans in place for delivery. It was a culture of 'just do things', rather than one with a structure and direction. It was driven by ministers but also by delivery managers, rather than by a deeper understanding of strategy and of the sector.”

5.5 In February 2024, the Home Office provided inspectors with a document entitled, 'Phase 1 Strategy report for the ten-year strategy for detained and non-detained accommodation'.

This document described a two-phase project for development of the strategy.

- 5.6** Phase 1 of the project concluded in November 2023. Areas considered during this phase included: “mapping of the current system/ service provision and funding for detained and non-detained accommodation, identification of ‘key actors’ (stakeholders with different levels of influence), pain points (major blockers to delivery) and lessons learned from recent initiatives and the experience of tactical delivery of large sites over the last 6-12 months”.
- 5.7** Officials were due to report on Phase 2 of the development of the strategy by the end of March 2024. This phase of the project involved “developing solutions and options for future system design” including consideration of the strategic options around contracting and funding. This would inform a detailed assessment of commercial delivery models, to be undertaken by the Asylum Support Accommodation Programme (ASAP).⁴⁶

46 Inspectors were provided with a PowerPoint presentation on the development of the strategy that noted: “The strategy will deliver a shortlist of options and a preferred approach to accommodation delivery over the next ten years, underpinned by clear system objectives, principles and success factors (as yet not defined).” In its factual accuracy response, the Home Office clarified

5.8 In June 2024, Home Office officials told inspectors that the strategy and the delivery plan for the 2024-2025 business year supporting the strategy were being developed further, including “modelling to inform expected volumes of accommodation required under different scenarios” and “testing with housing specialists the scale of our ambition on bringing new supply to market, and how quickly this could be done” before the documents are finalised.

Approval of large sites

5.9 In February 2024, the Home Office provided inspectors with a draft version of the programme

that the strategy was concerned with exploring strategic choices around contracting and funding, and was seeking to answer (by the end of March 2024): how much detained and non-detained accommodation [is needed]; the type and location of that accommodation; the roles that the Home Office, other government departments, local authorities and others should have in securing accommodation and providing services and support; strategic choices around contracting and funding; and contingency options for managing changes in demand. Meanwhile, the detailed assessment of commercial models fell within the remit of the ASAP, which would look at commercial procurement in advance of the expiry of the Asylum Accommodation and Support Contracts.

business case for the Asylum Support, Resettlement and Accommodation (ASRA) Asylum Accommodation Programme – Non-Detained (AAP (ND) programme), formerly the Large Sites Accommodation Programme (LSAP). In June 2024, it provided a final version (version 2.1) dated April 2024. These documents replaced an earlier draft business case, dated September 2023, which covered detained and non-detained accommodation. They outlined how “the urgency of the commission led to sites being secured and developed using expedited resourcing, commercial and investment approval routes to support fast delivery”.

5.10 Approvals for expenditure on large sites would normally be obtained by way of a business case presented to, and approved by, the Home Office’s Finance and Investment Committee prior to approval by HM Treasury (HMT). The Home Office informed inspectors that “due to the pressure to deliver a tactical response to overcrowding in Manston and the asylum estate, an expedited process was agreed with HMT and the Cabinet Office ... using Accounting Officer (AO) notes and retrospective business cases to enable the sites to be operationalised”. A senior manager told inspectors:⁴⁷

47 The Home Office provided the Accounting Officer notes (also known as advice) for March 2023, which

“We were told early on that the large pathfinder sites had to be delivered really quickly and governance will not stand in the way. There was an awful lot of pressure to deliver the pathfinder sites as quickly as possible we are now going through the business case process retrospectively, but it is possible they could fail some of the stage gate checks now, as the sites have already been pushed through by ministers.”⁴⁸

5.11 One of the key challenges recognised in the Home Office’s strategy development report is a “lack of understanding of systems objectives and key trade-offs. Political pressure to deliver at pace has sometimes caused us to move too quickly/not allow for all potential consequences for example, on large sites.” This was reflected in the comments of a senior manager who said that there had been “changing or unrealistic ministerial directions, and the programme has not been good enough at managing ministerial expectations”. The manager added that “sites have ‘gone live’ without ‘day one requirements’ being in place, such as recreational

set out the four tests of Regularity, Propriety, Value for Money and Feasibility that were met, enabling the proposal for funding to be approved.

48 The Home Office describes Wethersfield, RAF Scampton and the Bibby Stockholm barge as ‘pathfinder sites’.

activities at Wethersfield, despite the site having been in operation for months”.

5.12 Another senior manager told inspectors:

“The project controls were not in place, so ministers agreed everything. This is what the minister wants, so this is what we have to do ... People were making decisions based on their unevidenced perception of how cheap things would be, but they were wrong. You must think about things like fire doors, power, water, sewerage. None of these things were considered”.

5.13 The Home Office provided inspectors with the Accounting Officer (AO) advice for the ASRA Accommodation Programme, which had been issued in January 2024. This updated advice re-stated that all four tests (Regularity, Propriety, Value for Money and Feasibility) in the March 2023 AO advice were still being met for the four sites already committed to (Bibby Stockholm barge, Wethersfield, RAF Scampton, and Huddersfield), “despite significant challenges such as obtaining planning consent”.⁴⁹ In August 2024, the Home

49 HM Treasury provides guidance on the four tests of Regularity, Propriety, Value for Money, and Feasibility. See: https://assets.publishing.service.gov.uk/media/646632530b72d3000c34478a/AOA_guidance_May_2023_3.pdf

Office provided inspectors with a further update of the AO advice, dated 30 April 2024. This stated:

“All four of the accounting officer tests continue to be met. The regularity and propriety tests present minimal risk, with feasibility presenting ongoing planning permission challenges, but considered met. There remain ongoing significant risks which could impact VfM.”

Value for money of asylum accommodation

5.14 Contingency hotels are intended to be used as short-term accommodation for a limited period when demand cannot be met through dispersal accommodation (DA). In addition, the Home Office notes, in its April 2024 business case, that “hotels are significantly more costly than DA”, as “the ‘per person per night’ cost of DA is around £20”, while the average cost of a hotel (in the three months to June 2023) was “approximately £158 per person per night”. With around 51,800 asylum seekers accommodated in hotels, this equated to an average of £8.2 million spent on hotels per day. Since 2020, the demand for DA has significantly outstripped supply, and the Home Office expects it to remain high until at least 2026-2027 (with estimates of between 80,000 and 120,000 asylum seekers requiring accommodation following the passing of the Illegal Migration Act 2023), at levels

“significantly exceeding achievable contracted DA provision of around 50,000”. Throughout 2023 the Home Office had a target to have 100,000 DA bedspaces by the end of the year. This was clearly unrealistic.⁵⁰

5.15 The Home Office has sought to assess value for money of large sites by comparing the cost of each site with the cost of accommodating people in hotels over the life of the site. The January 2024 AO advice set out that value for money of the four sites had weakened since the original AO advice in March 2023, due to “cost challenges at sites and fluctuating hotel costs as the Home Office continues with plans to exit hotels”.⁵¹ There is considerable uncertainty around future trends in the hotel rate, and the advice concluded that, “overall, without these sites, we would be reliant

50 According to documentary evidence provided for this inspection, by October 2023 there were c.60,000 DA bedspaces. The November 2023 ASRA Risk Register still showed the target as 100,000. In early 2024 the Home Office provided inspectors with a slide entitled ‘National Dispersal Plan’ dated 28 January 2024. This showed a revised target of 92,135, but with no timescale.

51 The Bibby Stockholm barge, the former Ministry of Defence (MoD) site at Wethersfield, another former MoD site at RAF Scampton, and a site in Huddersfield formerly proposed for student accommodation (this is included in the programme but is a medium-sized site).

solely on hotels as an alternative to DA. It has so far proved difficult to hit net increase targets for DA under separate Home Office initiatives.” The January 2024 AO advice stated that “the most at-risk site of not satisfying value for money is RAF Scampton”, mainly due to the cost of modular accommodation being installed at the site.

5.16 The AO advice was updated on 30 April 2024. In August 2024, the Home Office informed the Independent Chief Inspector of Borders and Immigration (ICIBI) that this advice was “the most robust and relevant economic analysis for decision making on the programme” and had superseded the final version of the business case.⁵² The April 2024 AO advice notes that:

52 Both the AO advice and the business case for the Asylum Accommodation Programme refer to value for money (vfm) using the whole-life net present value (NPV) of the four sites (Wethersfield, Bibby Stockholm, Huddersfield and Scampton) against the hotel rate (in the case of the AO advice this is a range rather than a set rate). NPV is the difference between the present value of cash inflows and the present value of cash outflows over a period of time. In general, projects with a positive NPV are worth undertaking, based solely on revenues, expenses, and capital costs, while those with a negative NPV are not. Whole-life costs include sunk costs. According to the HM Treasury ‘Green Book’, sunk costs are costs which have been spent or committed

“Hotel costs remain the counterfactual for VfM [value for money] assessments. The actual 3 month rolling average cost per person per night is used, but in recognition of the progress on hotel exits we are including other metrics including the cost per bed per night to avoid short-term skewing due to the delay in closing hotels after people leave. This provides a range of hotel costs given the inherent uncertainty of £101-£162pppn [per person per night]. As the exit programme continues Commercial work is progressing to renegotiate reduced hotel rates. Following the discussion at PAC [Public Accounts Committee] we have drawn out in this advice the fact that hotels are not intended for asylum accommodation and the wider issues, aside from cost, with using them.”⁵³

5.17 According to the April 2024 AO advice, the net present value (NPV) for the AAP(ND) was between –£43.7 million and +£158.8 million,

to, and which cannot be affected by decisions still to be made. In this context, they include the costs associated with establishing a site, including site purchase, lease costs, set up costs, refurbishment costs and leasing and operation of modular accommodation.

53 The Public Accounts Committee took evidence from Home Office witnesses, including the Accounting Officer, on 15 April 2024 on Asylum Accommodation and UK-Rwanda Partnership.

excluding “programme resource costs”.⁵⁴ The NPV for the four AAP(ND) sites is shown in figure 8.

Figure 8: Net present value (NPV) of the four Asylum Accommodation Programme (Non-Detained) Sites according to Accounting Officer advice dated 30 April 2024

Site	NPV excluding sunk costs – £ million ⁵⁵	NPV ‘whole life’ – £ million
Wethersfield	-£24.7 to +£25.3	-£73.1 to -£24.8
Bibby Stockholm ⁵⁶	+£6.5 to +£12.9	-£3.6 to +£2.5
Scampton	-£19.7 to +£17.5	-£87.7m to -£51.8

54 The April 2024 business case quoted a negative NPV of -£17.6 million (against a counterfactual rate of £140 and excluding sunk costs) for a ten-year appraisal period beginning in April 2024 and excluding all sunk benefits and costs incurred prior to this date. The business case stated: “This means that, under core assumptions, continuing with the existing sites in the programme does not represent value for money. Value for money is achieved when the hotel rate goes above £144.”

55 In the case of Wethersfield this excludes local authority incentivisation payments of £6 million (£3,500 per bed). In the case of the Bibby Stockholm it excludes local authority incentivisation payments of £1.6 million.

56 The original AO advice in March 2023 was based on a different barge, the Bibby Progress, which subsequently became unavailable and the Home Office was offered the Bibby Stockholm instead.

Site	NPV excluding sunk costs – £ million ⁵⁵	NPV ‘whole life’ – £ million
Huddersfield	–£5.8 to +£98.1	–£43.1m to +£60.9

5.18 When considering new ‘pipeline’ sites (needed to reach 6,500 bedspaces by the revised target of December 2026), the April 2024 business case states, “the value for money position becomes increasingly uncertain”.⁵⁷ This is due to “considerable uncertainty about site specification, costs and the correct counterfactual beyond 2026. This is further complicated by the uncertainty of the impact of the Illegal Migration Act on demand for non-detained accommodation.”⁵⁸ According to the business case, when including sunk costs and programme costs, on a whole-life cost basis, the programme has a negative NPV of –£266.7 million for the four existing sites. The April AO advice quotes a range for NPV of between –£207.6 million and –£13.2 million. These figure do not include programme resource costs.

57 Pipeline sites are those sites that are being considered prior to due diligence being completed.

58 The business case highlights that even if there is a high impact from the Illegal Migration Act, “in all demand scenarios, accommodation of some form will likely be required for a minimum of 10 years” and therefore hotels cost is still the relevant comparator when assessing the value for money position of an AAP (ND) site.

- 5.19** The Home Office has recognised that “pursuing large sites to reach the 6,500 bedspace target is not expected to generate positive value for money under any scenario” and “experience from pathfinder sites has shown diseconomies of scale when operating large sites”. The business case concludes that the current large sites be progressed and smaller-capacity, medium-sized sites added. “Medium-sized sites will accommodate single adults and families and have a capacity of between 200 and 700 persons.”
- 5.20** The April 2024 business case states that “the capacity of sites in delivery have been reviewed downward based on lessons learnt from the pathfinder sites” and makes reference to a ministerial submission, in February 2024, requesting lowering of the capacity of the site (at Wethersfield) to 1,245 beds (from 1,700) and capping occupancy at 800 people. The occupancy of RAF Scampton has also been capped at 800. The Home Office’s value for money assessments of the large sites assumes a maximum occupancy of 90%, which it does not anticipate it will achieve. As one senior civil servant noted: “The value for money question always comes up; large sites were always marginal value for money – even if sites are at capacity.”

5.21 The Home Office told inspectors it is reviewing how it assesses the value for money of sites including:

“reviewing use of modular accommodation at Scampton (and Wethersfield) and by working up ‘a full Benefits Strategy’ under the programme. To date value for money has been based on a basic comparison between costs of the sites and costs of hotels. The Benefits Strategy will explore whether the NPV calculation can be supported by additional quantitative/qualitative benefits so that we are fully considering the rationale for use of these sites versus the alternative of hotels.”

By omitting consideration of benefits as well as costs in value for money assessments to date the Home Office had not developed a full picture of the value for money of the accommodation programme.

5.22 The assessment of value for money of the asylum accommodation programme is complex, particularly given the multiple factors that can impact it over time. NPV is an established method of evaluating whether to proceed with expenditure decisions. Using this method, the Home Office has not demonstrated that its current and proposed accommodation programme represents better value for money than use of hotels. But, as one senior manager observed: “If we want flexibility, it

comes at an increased cost, and this may be more expensive than hotels.”

Large sites not progressed

- 5.23** Inspectors requested details of large sites and vessels considered as part of the large sites programme which have not been progressed. The Home Office stated that “there are approximately 900 sites that had due diligence completed and were subsequently not taken forward”. As one senior manager highlighted: “there’s absolutely loads ... hundreds and hundreds, which must reflect a considerable waste of resource and effort.” Inspectors requested the details of the sites not progressed. The Home Office provided a list of just 64 sites that “were visited and subsequently discounted”.
- 5.24** The Home Office has incurred considerable costs as a result of plans that will not generate any additional accommodation. For example, in its Annual Report and Accounts for 2022-2023 it declared “fruitless payments of £2.9 million preparing the former RAF base in Linton-on-Ouse, but this project was later cancelled after the Ministry of Defence said the site was no longer available”. A further £0.5 million was spent by the Home Office “for reserving vessels it hoped to use as asylum accommodation but was unable to as it could not secure a suitable port”.

5.25 A Home Office senior manager told inspectors of another example. Northeye Residential and Training Establishment, on the outskirts of Bexhill, an original pathfinder site, “was bought due to a push by the minister before any due diligence was done on the site and they later discovered the land was contaminated so it was not usable”. The Home Office stated that it “now undertakes earlier due diligence, including a property subgroup, to ensure that sites are discounted before committing to spending”.

Progress with the large sites’ accommodation programme

5.26 There have been significant challenges to delivery of RAF Scampton and the continued use of Wethersfield, including legal challenges relating to planning permission and the suitability of the sites as accommodation for asylum seekers. A number of these challenges were still outstanding in March 2024, when the initial draft of this report was being prepared.⁵⁹ At that time, the Home Office

⁵⁹ In June 2024, the Home Office provided an update on the challenges in respect of suitability and planning issues: “Suitability: Following numerous asylum seekers issuing judicial review (JR) claims challenging the suitability criteria for those accommodated at Wethersfield, a case management hearing took place before the High Court (McGown J) on 27 February 2024

laid Special Development Orders (SDOs) before Parliament to come into force from 11 April 2024 following the expiry of planning permission (under

in relation to 10 of these judicial review claims – four of the claims were granted permission to proceed, linked together and appointed as lead cases on the common issues. The remaining claims are now stayed behind the lead cases pending substantive hearing and judgment on those common issues. The 4 lead cases were listed to be heard substantively over 3 days from 23 to 26 July 2024. The Home Office is robustly defending these claims. Planning: Following the laying of the Special Development Orders for Scampton and Wethersfield, the appeals by Mr Clarke-Holland, Braintree District Council and West Lindsey District Council (WLDC) against the High Court judgment on use of Class Q planning permission, which found in favour of the Home Office in the autumn, were all withdrawn. The Home Office has reached an agreement in principle with WLDC for dual use of the Scampton site, which will enable the parties to bring current and proposed litigation to an end. This includes the Home Office’s claims for Judicial Review against WLDC over enforcement action. The Mayor of Dorset, who brought a judicial review against Dorset County Council over planning permission for the Bibby Stockholm, in which the Home Office was an interested party, has lost her claim. The court confirmed that planning permission is not required.”

Class Q).⁶⁰ These SDOs granted permission for the sites to be used until 10 October 2027.

A move away from large sites

5.27 The February and April 2024 draft business cases set out key changes in the scope of the programme since the September 2023, including:

- inclusion of families as well as single adult cohorts in new schemes
- consideration of future sites that allow access to wraparound services⁶¹
- bedspace targets having changed from 10,000 by June 2024 to 6,500 by December 2026

60 The Town and Country Planning (General Permitted Development) (England) Order 2015, Class Q (permitted development) enables the Crown to develop a site in an emergency for a maximum period of six months. To continue to use of a site after expiry of Class Q, a Special Development Order is required which has to be agreed by Parliament, rather than the local planning authority. See: <https://www.legislation.gov.uk/uksi/2015/596/schedule/2/part/19/crossheading/class-q-development-by-the-crown-relating-to-an-emergency>

61 Wraparound services are services provided to ‘service users’ by local public services and community groups.

- site selection criteria having been broadened, with the programme no longer limited to the delivery of large sites; it will now also focus on smaller sites that will deliver more flexible and cost-effective accommodation to support demand
- value for money assessments of three options: ending use of large sites, continuing use of large sites only, and the Home Office's preferred option of continuing with the existing sites and using smaller, more flexible sites to deliver the remaining bedspaces to reach the target

5.28 The Home Office recognises that increasing the capacity of regular DA to meet demand is not feasible “as housing suitable for DA is in short supply, there is evidence of cross-government competition for the same housing stock, and securing this housing for DA is unhelpful for local authorities, some of whom have long waiting lists for social/affordable housing”. One senior manager suggested that the “strategic direction needs to be not the private rental sector; we need to be adding to the market rather than taking from it as the sector is so overheated.”

5.29 The April 2024 programme business case described phase one as “being almost complete with delivery of sites at Portland, Scampton and Wethersfield”. Phase two is described as the

“provision of a right-scoped and right-sized estate, driving value for money, quality and system wide efficiencies by having an estate with the ability to increase and decrease capacity depending on requirements (Run for 5-10 years)”. Earlier versions of the business case acknowledged that there is a “high risk” that pipeline sites currently going through the approval and due diligence stages will not deliver their contribution to the target for bedspaces. This was omitted from the April 2024 update.

Forecasting demand for asylum accommodation

5.30 The ICIBI 2021 inspection of contingency asylum accommodation made a recommendation that the Home Office should “develop effective plans and forecasts for the continuing intake (and seasonal peaks) from small boat arrivals and their impact on the contingency asylum accommodation estate”.⁶² In February 2024, the Home Office stated, in response to a request for evidence for the current inspection, that it had since developed “an improved suite of modelling tools across the asylum system that enable better assessment and monitoring of flow and its likely impacts on demand for asylum accommodation”.

62 ICIBI, ‘An inspection of contingency asylum accommodation’.

5.31 The use of such modelling tools was designed to review accommodation demand against supply to support both short- and long-term strategies for the accommodation estate. This enabled the Home Office to forecast a significant overspend of £4,226 million (with a mid-range forecasted expenditure of £4,419 million) against an original asylum support budget of £192.6 million for 2023-2024. The risk register cited “significant uncertainty in the forecasting”, but no additional rationale was provided as to how this could be so widely divergent given its improved capacity to anticipate demand. On 11 March 2024, the Home Office submitted to Parliament an updated estimate for the total budget for ASRA for 2023-2024 of £5,422.3 million, a 39% increase on the 2022-2023 supplementary estimate.⁶³

Maximisation policy and hotel consolidation and exit strategy

Project Maximise

5.32 During 2023, in conjunction with the consultancy firm Newton, the Asylum Support, Resettlement and Accommodation (ASRA) directorate within the Home Office undertook ‘Project Maximise’ as

63 House of Commons Library (published 11 March 2024). ‘Estimates Day debate: The spending of the Home Office on asylum and migration’.

a discrete piece of work to make more efficient use of hotel bedspaces. In April 2023, an 'Estate Optimisation' taskforce was established and reviewed the data for one of the accommodation service providers which showed that, on 7 March 2023, of the 32,656 bedspaces procured by that provider, 11,043 (33.8%) were unoccupied.

5.33 In the top four 'worst performing' hotels for that provider, which accounted for 3,604 bedspaces, the average figure for unoccupied bedspaces rose to 54%. Further analysis of the reasons behind this figure highlighted four main factors:

- single adults in twin or triple space rooms – 625 bedspaces (17.3%)
- single adults in rooms with a double bed – 343 bedspaces (9.5%)
- claimed bedspaces that were found to be non-existent – 244 bedspaces (6.8%)⁶⁴
- bedspaces available but not filled – 172 bedspaces (4.8%)

The conclusion of the taskforce was that nationally there could be at least 7,000 extra bedspaces

64 The taskforce was unable to locate bedspaces that the service provider had included in their costs charged to the Home Office.

made available through sharing of bedrooms across the whole asylum accommodation estate.

5.34 The aim of Project Maximise was then set to increase the total bedspace availability across all three accommodation providers. This was to be achieved by increasing the number of available bedspaces within existing locations and increasing the rates of occupancy across the estate. The optimisation of the use of the existing estate was intended to prevent the need for procurement of new contingency asylum accommodation and to reduce the use of hotels. However, this would also be dependent on the intake of ‘service users’ and other factors remaining constant.

5.35 In late April 2023, Project Maximise commenced and used an initial three-step approach (‘Phase One’) to deliver capacity for an additional 6,000 to 9,000 service users in existing locations by mid-July 2023. These steps were to:

- fill twin rooms with two service users (managed by Clearsprings Ready Homes (CRH) and Serco)
- convert double rooms to twins (managed by CRH and Serco)
- commence room sharing at sites managed by Mears, and, through regional stakeholder engagement, gain the agreement of local

authorities to an increase in the number of service users that can be accommodated in each geographical area

5.36 A ‘Phase One’ target for the project of 9,185 additional bedspaces across the three providers was eventually set.

5.37 The ‘Phase One’ target was to be achieved through two workstreams:

- maximisation – the realisation of the three-step approach outlined above
- bedspace management – weekly meetings held with the providers to challenge them on how efficiently they were filling their contracted hotels and what remedial actions were being taken if a shortcoming was identified

5.38 In ‘Phase Two’ of the project, rooms that could accommodate three or more service users were to be reconfigured to maximise occupancy, while in ‘Phase Three’ service providers were to explore “further occupancy opportunities” such as the use of “shared spaces” in hotels to provide more bed spaces.⁶⁵ Neither ‘Phase Two’ nor ‘Phase Three’ were enacted.

65 ‘Shared spaces’ includes communal rooms, such as meeting and conference rooms.

5.39 As this work progressed, it was clear that the project was on course to deliver higher occupancy rates, and by the end of December 2023, the Project Maximise team stated that it had delivered 11,839 additional bedspaces with a combination of new bedspaces (approximately 80%) and voids being filled (approximately 20%).

Hotel consolidation and exit strategy

5.40 On 29 September 2023, a submission to ministers confirmed that no new hotels needed to be opened and set out 100 hotel sites that could be appraised for closure in line with ministers' requested focus on exiting hotels located in rural areas. The reason given for closing hotels in more rural settings was "their relative importance to the local populations, both in terms of use for local events such as weddings and local tourism, coupled with the challenges that those areas had in terms of the provision of wraparound support, for which we do not provide funding". These 100 hotels had 12,100 bedspaces accommodating 4,262 family service users (including 1,988 children) who were to be relocated to other hotels. On 24 October 2023, Home Office ministers announced that the closure of the first 50 of these hotels would be complete by end of January 2024.

5.41 On 7 November 2023, a further submission to ministers set out criteria for the next tranche of

hotels to be exited. This recommended prioritising those ranked highest in terms of value (those with high cost, short contractual notice periods, and no feasibility to be ‘maximised’ in terms of occupation having the highest value ranking) and lowest complexity (hotels with the smallest number of single adult males having the lowest complexity ranking).

5.42 The inspection team was provided with a ‘Hotel Exit List’ as of 1 February 2024, which contained information about the progress of hotel closures since October 2023. The list had details of 147 hotels due to close by end April, of which:

- 64 had ceased to be used and where the contract had ended
- 27 had been fully vacated, but remained within the contract notice period
- 4 where contractual notices had been served and service user decant was in progress
- 52 where contract notices had been served and final site vacation was yet to commence⁶⁶

66 On 27 June 2024, the Home Office provided the following updated statistics for the status of Project Maximise: “As of the 16/06 [2024] the hotel population had decreased to approximately 95,400. There was a total of 231 hotels in use of which 32 sites scheduled to close by August [2024]. Since October 2023, 159

- 5.43** Project Maximise clearly resulted in the more efficient use of the considerable spare bedspace capacity across hotels in 2023. Home Office managers also acknowledged that the project had helped to enhance the development of service provider data on occupancy, which was important as this was used to inform the Home Office’s invoicing system.
- 5.44** Inspectors visited a large hotel in a rural setting that was being emptied out ahead of planned closure by the Home Office and observed that works to create five additional ensuite rooms had just been completed, with facilities fully fitted. These works had been undertaken by the hotelier in response to the Home Office’s efforts to maximise the use of the available hotels, but they were no longer going to be used by the Home Office. It was unclear to inspectors whether the programme of hotel closures resulted in any costs to the Home Office that may have been avoidable.

Lessons learned from the setup of asylum accommodation sites

- 5.45** Inspectors asked the Home Office to provide evidence of lessons learnt from the establishment

hotels have been closed (contract ended) and further 18 currently stand vacant pending contract end before end of June [2024]”.

of sites such as Napier Barracks and how these were applied to later sites. The Home Office reported that it had identified lessons from the experience of accommodating Afghans as part of the resettlement scheme, and asylum seekers in dispersal accommodation, hotels, and large sites.⁶⁷

5.46 The Home Office recognised the importance of having an effective funding package for Afghan resettlement, which was developed in collaboration with local government and was more generous than the general asylum funding. The involvement of various stakeholders, including local authority housing staff and the cross-government delivery board, played a critical role in driving progress in this area. Maintaining clear communication and roles with the local authority and hotel management was also considered crucial. It was not evident to inspectors how these lessons had been applied to contingency asylum accommodation.

5.47 As for the use of hotels as asylum accommodation, in its evidence for this inspection, the Home Office acknowledged that spikes in demand for bedspaces, and breaches in agreed

67 UK Visas and Immigration and Home Office, 'Afghan citizens resettlement scheme' (published 18 August 2021). <https://www.gov.uk/guidance/afghan-citizens-resettlement-scheme>

detention timescales at Manston, put them in a weak negotiating position with existing providers, resulting in poor value for money. However, the Home Office found that its work to make better use of available bedspaces in hotels during 2023, through Project Maximise, had provided better data, which it said enabled it to negotiate better terms with service providers. The Home Office also identified that improvements were needed in data and management information systems.

5.48 Regarding dispersal accommodation, the Home Office accepted that uncertainty about the effectiveness of the funding package and reductions in grant funding for local authorities may have worsened the situation. The targets set were challenging given the scale of the issues, and the equitable distribution model had constrained its ability to increase bedspaces where there was available capacity.⁶⁸ The Home Office also acknowledged that it had taken insufficient action,

68 The government announced a move to full dispersal on 13 April 2022. The government's full dispersal accommodation allows the Home Office to move from using hotels to less expensive and more suitable dispersal accommodation. Under full dispersal plans, all local authorities in England, Scotland and Wales are considered a dispersal area and are required to take part in asylum dispersal. This was intended to provide a more equitable distribution of asylum seekers across the UK

which would include, for example, working with other government departments, local authorities and housing associations, to address underlying issues in the housing market.

Large sites – lessons learned

- 5.49** In terms of large sites, the Home Office acknowledged that it had underestimated the challenges posed by local opposition and planning difficulties. It recognised it did not have the necessary commercial and operational capabilities for complex estate projects but was now building these. The department stated that the challenging targets and planning assumptions it faced had led to short-term decision making and delays in project delivery, and that a more strategic approach was needed with better engagement with other government departments.
- 5.50** Inspectors were particularly interested in how the Home Office had incorporated the learning from previous sites, such as Napier Barracks, in the development of the pathfinder sites: Wethersfield, RAF Scampton, and Bibby Stockholm.⁶⁹ The

and reduce pressures on the minority of local authorities which previously participated.

⁶⁹ While Napier Barracks was not classified as a 'large site' according to the Home Office's definition, it was the only operating site of similar size and layout that could provide insights for future blueprints of large site projects.

Home Office stated that the decision to set a maximum length of stay for service users of nine months at the pathfinder sites was influenced by experience gained from Napier Barracks. In March 2023, a ministerial submission considered service user length of stay at pathfinder sites and highlighted that Napier Barracks had implemented a day limit of 60 to 90 days prompted by criticisms and adverse findings from the High Court regarding the nature and conditions of the site. However, the experience of Napier has not been used to inform the model for new sites more broadly, including provision of purposeful activities for service users to alleviate boredom, drawing on engagement with voluntary sector organisations, and providing certainty for service users over their likely length of stay. This was despite Napier being a more settled operation now, and with broadly positive feedback from service users.

5.51 Senior managers told inspectors that lessons were being drawn from the recent pathfinder sites for future implementation, rather than from Napier Barracks. A senior civil servant (SCS) told inspectors that the pathfinder sites were used to capture best practice and that any findings were incorporated into the future strategy and operational plans. One key lesson learned was the optimal number of service users that should be accommodated at large sites at any given time. A senior manager felt it was difficult to use

a templated approach for each large site due to the unique characteristics and nature of each site, and the different providers. They stated that Wethersfield played a crucial role in the Home Office's understanding of the need to scale back the number of service users to a more manageable figure, but with the ability to increase capacity if necessary. However, inspectors noted that this was a lesson that could have been applied from the experience of Napier Barracks two years previously.

- 5.52** One SCS stated: “We have learned that there is a site size that is manageable – 400 seems to work ok; once you go over 500 it does not work. However, we need to understand behaviour-wise as to why that is the case.” Another SCS told inspectors that “a paper was being prepared to explain why we should never consider a 2,000-bed site again”.
- 5.53** Inspectors considered the onsite facilities at Napier Barracks, specifically the wide range of activities for service users organised through the non-governmental organisation (NGO) hub to be a model for engaging service users at other sites. Service users spoke positively of their experiences at Napier Barracks, describing it as a “transformative” environment. They emphasised the positive influence of the onsite staff and the

opportunities they had to volunteer and contribute to the local community.

- 5.54** In contrast, inspectors found that the lack of purposeful activity at Wethersfield had led to declining mental health of service users. Everyone was “fed up and tired”, with one service user stating: “I have done nothing. I cannot learn, develop, or communicate. It is a waste of a life.”
- 5.55** A Home Office SCS explained that the Programme Management Office now conducts a review of lessons learned at the conclusion of each project development of a site, before handing over the project to operational colleagues. Additionally, inspectors were told that workshops are organised to share lessons learned at every site, even for those sites that are not ultimately established. A strategy steering group, with Home Office-wide attendance, was meeting every two weeks to examine both past lessons learned and future considerations in order to establish a new strategic operating model.
- 5.56** On 27 June 2024, the Home Office provided an update of its approach to learning the lessons from operating the AAP (ND) for the past two years. In May 2024, it had drawn together lessons captured from each site, key themes, whether positive or negative, and whether the lesson has been learnt or not. As a result, it has identified 25 common themes, including a need for a more

robust site selection process and criteria that consider local concerns and constraints; a need to engage health and safety expertise directly and not rely on the service provider having the technical expertise; voluntary sector and discretionary activities needing to be included at the design stage; and the setting of realistic deadlines in light of the complexity of the project. The Home Office has also stated that it planned to embed lessons learned into ‘business as usual’ by September 2024.

Bibby Stockholm – lessons learned

- 5.57** The Bibby Stockholm barge also served as a pathfinder site, and lessons learned from its set-up and operation were identified in an update provided to inspectors by the Home Office on 27 June 2024. This exercise aimed to capture the challenges of using vessels and operating within a port environment. Inspectors were provided with a ‘Portland Project Lessons Learned Report’, dated January 2024, which highlighted both the successes and failures during the set-up and operation of Bibby Stockholm.
- 5.58** Regarding the successes, the Home Office stated that it had established a strong working relationship with the Multi-Agency Forum (MAF) and its subgroups. This collaboration enabled the timely completion of the barge delivery within the

tight timescale of six months. Additionally, effective stakeholder communication played a crucial role in overcoming issues and providing reassurance to external stakeholders and the wider community. This approach was also said to have fostered a collaborative environment.

5.59 Another major lesson identified by the Home Office was the importance of having a strong port operator who was willing to work closely with the Home Office and the supplier. This operator's close relationship with local partners and their ability to oversee both ports and vessels proved to be highly beneficial. It ensured compatibility and impartiality in the procurement and commercial process.

5.60 The Home Office report acknowledged several areas that did not work well. The lack of clarity regarding the project's objectives and expected outcomes led to scope creep and uncertainties about roles and responsibilities. There was confusion about the deliverables, who would be responsible for delivering them, and when they were expected to be met. Ministerial expectations regarding the pace of delivery posed challenges and resulted in insufficient time to follow standard project methodologies, such as detailed requirement gathering, and incomplete adherence to governance and processes, including the

absence of business cases before making contractual arrangements.

- 5.61** Separately to the lessons learned report, an SCS informed inspectors that the discovery of legionella on the Bibby Stockholm in August 2023 had amplified the importance of proactively addressing health and safety to prevent future issues.
- 5.62** The Home Office conducted an internal review of the decision to commence occupation of the Bibby Stockholm barge, taking into consideration the timing of the discovery of legionella in the water system. The reviewer, who worked for the department, felt that the Home Office had approached the incident in the best way possible, given the information that had been shared by third parties. The review concluded that the Home Office should have been more diligent in requesting written confirmation of the applicable statutory regulations relating to health and safety on the barge, including confirmation of the adequacy of all water management procedures.
- 5.63** Additionally, the review concluded that a Home Office nominated Senior Responsible Officer (SRO) should have been appointed prior to 'go live', and that there was a need for clearer differentiation between the roles and responsibilities of the Home Office and the service provider. Inspectors concluded that, given the seriousness of the event, an external review

undertaken by a health and safety professional, with experience of water safety and the risks presented by legionella, would have been more appropriate and would likely have challenged the Home Office's management of the incident more robustly.

- 5.64** Home Office senior managers felt that early engagement with the community was key when setting up large sites, and this had been something they had tried to establish with the community around the Bibby Stockholm. Senior managers told inspectors that engagement had been the “one thing that had been done well” with the Bibby Stockholm and emphasised that this positive engagement should be carried forward when considering the opening of future large sites, such as Scampton. However, some stakeholders saw things differently. They said that Home Office engagement with them regarding the Bibby Stockholm occurred only “quite late” in the process, and that, when it did, “it was not a case” of officials asking “is it feasible?”, but of saying “this is happening.”
- 5.65** Home Office managers responsible for the development of future sites told inspectors they recognised the need for a more efficient and thoughtful approach to engaging with the community when opening large sites. They emphasised the importance of timing in sharing

information to prevent potential community tensions surrounding the launch of these sites. A local stakeholder for the Bibby Stockholm barge told inspectors that the Home Office should learn to “trust the local system and trust us early. I think they [Home Office] have learned that lesson, but they have learned that slowly”.

Conclusion – strategic approach and value for money

- 5.66** In its attempt to stop using hotels and find cheaper options for housing asylum seekers, the Home Office has invested considerable time, effort, and money into developing proposals for large sites and vessels. However, this work has suffered from the lack of a clear vision and supporting strategy, and weak governance. The department has incurred significant unrecoverable programme costs in bringing forward and developing large sites, and it has not been able to demonstrate that these represent value for money, including in comparison with hotels.
- 5.67** Since October 2023, there has been progress with maximising the use of empty bedspaces in hotels and closing those hotels that are surplus to requirements. However, by not identifying and applying the learning from the earlier setting up and operation of former Ministry of Defence sites (such as Napier Barracks), or from costly errors

in planning (such as the failed project to develop RAF Linton-on-Ouse), or from operating for well over a year with hundreds of hotels, the Home Office did not anticipate and manage the risks and operational challenges of acquiring and providing contingency asylum accommodation as effectively or efficiently as it should have.

6. Inspection findings: Leadership and management of operations

Introduction

6.1 Inspectors considered the leadership and management of contingency asylum accommodation operations, as well as engagement with key stakeholders, against a backdrop of growing demand for asylum accommodation and political pressure to reduce costs. In doing so, inspectors looked at whether it was clear who had ownership and accountability for delivery of contingency asylum accommodation, including the large sites programme.

Governance and structure

6.2 Governance of the Asylum Accommodation and Support Contracts (AASCs) is managed by the Asylum Support team, which sits within the wider Asylum Support, Resettlement and Accommodation (ASRA) directorate. The team consists of a Director, three Deputy Directors, and eighteen Grade 6 staff. Of the Grade 6 staff, 13 oversee teams who manage the provision of

adult and family contingency accommodation
(see figure 9).⁷⁰

70 This inspection did not include unaccompanied asylum-seeking children (UASC) Operations within its scope because this area had been subject to a separate inspection in 2023 : ICIBI, 'A re-inspection of the use of hotels for housing unaccompanied asylum-seeking children (September – October 2023)' (published 29 February 2024). <https://www.gov.uk/government/publications/a-re-inspection-of-the-use-of-hotels-for-housing-unaccompanied-asylum-seeking-children-september-october-2023>

Figure 9: Asylum Support senior management structure at December 2023^{71,72,73}



6.3 Oversight of the three main providers of the AASCs (Mears, Clearsprings Ready Homes (CRH) and Serco) is within the remit of Asylum

71 UASC: Unaccompanied asylum-seeking children

72 NAAU: the National Asylum Allocations Unit

73 PFS: Pre-paid financial services (including the Aspen card)

Support, managed by three Grade 6 Heads of Service Delivery. Service delivery teams are comprised of Grade 7 Service Delivery Leads and Senior Executive Officer (SEO) Service Delivery Managers, who oversee the routine delivery of the contracts and report into the respective Grade 6 Heads.

- 6.4** The Asylum Accommodation Programme – Non-Detained (AAP-ND) (formerly the Large Sites Accommodation Programme) also sits within ASRA and has a project management function with responsibility for identifying and delivering alternative accommodation sites to reduce the reliance on hotels. The AAP-ND consists of a Director, four Deputy Directors, and 13 Grade 6 staff who oversee teams responsible for the acquisition of multi-purpose non-detained asylum accommodation, including large sites, to the point of service delivery to the end user (see figure 10).

Figure 10: Asylum Accommodation Programme – Non-Detained (AAP-ND) senior management structure at December 2023



6.5 The governance structure in place to review service provider performance for contingency accommodation, as part of the AASCs, is outlined in figure 11.

Figure 11: Contract governance structure for Asylum Support



- 6.6** With the exception of the Bibby Stockholm barge, which is subject to a separate contractual arrangement with Corporate Travel Management (CTM), all contingency accommodation sites fall under the AASCs. However, inspectors found a confused picture regarding oversight arrangements for large sites.
- 6.7** There was a nominated Grade 6 Operational Lead for Large Sites and Continuous Improvement who, in practice, only had responsibility for Wethersfield and Napier Barracks, even though Napier was not considered to be a large site. Separate oversight arrangements were in place for the Bibby Stockholm, with a Grade 6 Portland Site Oversight Lead (SRO), despite the service delivery team for the site still reporting into the Operational Lead for large sites. There was also a separate nominated

Grade 6 for Wethersfield (SRO). From their interviews with senior managers, inspectors found a general lack of clarity in relation to the different roles and responsibilities.

Ownership and accountability

- 6.8** One of the ICIBI's expectations for any asylum, immigration, nationality, and customs function (see Annex B) is that there is a clear Home Office 'owner'. Inspectors found an absence of clear ownership for the delivery strands of the asylum accommodation programme at senior levels within ASRA, exacerbated by frequent changes in senior leadership. Several different versions of organograms of ASRA senior leadership staff and structures were provided to the inspection team, indicating frequent changes in reporting lines. This lack of continuity in leadership risked the loss of corporate knowledge and missed opportunities to identify and drive learning across the ASRA directorate.
- 6.9** The most recent organisational structure provided to inspectors appeared to offer greater clarity around lines of responsibility. However, one senior manager told inspectors: "It was not a good idea to have so many senior civil servants. It doesn't make it easy when it comes to governance. I would like clearer lines of command. People make assumptions about who is doing what ... It is so

siloes; we don't join up or talk to each other." An SCS told inspectors that, while responsibilities were clear, "there was still further work to do to make sure that accountability is super clear and working effectively". Reflecting on the issues regarding one large site, another stated: "I was not clear on what I was accountable for and what I wasn't ... and [this] impacted on our ability to respond on issues. No one got hold of it [the issues] and as a result the site was not as effective and efficient as it could be."

6.10 In the absence of an overarching accommodation strategy, inspectors found operational working across the ASRA directorate to be disjointed, with duplication of effort across the various workstreams. Despite Asylum Support and AAP-ND working towards the same goal, namely the provision of contingency asylum accommodation, they were managed as very distinct areas with no clear lines of communication between the two. One senior manager told inspectors: "It becomes difficult to manage between teams; you can see the exact same role being done with a different part of the business ... Without a strategy we can't focus on this duplication of effort without other things taking over."

6.11 One member of the ASRA senior leadership team also commented on the challenges faced

due to a “lack of clear direction from ministers”, as well as operating in a “politically toxic” and pressured environment, further stating: “The wider system thinking view is skewed ... The opposition from MPs and local authorities blinds you to everything else.”

- 6.12** Inspectors noted a reluctance on the part of some senior staff to engage in conversations around costings and value for money, as they were “not sighted on the figures” or because “responsibility sat with the commercial team”. The commercial team is responsible for negotiating and monitoring contracts. However, managers and staff within ASRA have a responsibility to safeguard public money by ensuring service providers are properly held to account and are providing efficient and effective delivery. Inspectors were told that the AAP-ND teams now had the confidence to challenge the feasibility and operational practicality of certain proposals, including from ministers, and to “push back” against them.

Capability planning

- 6.13** With regard to long-term capability planning, inspectors found an over-reliance on contracted staff. The Home Office was not investing sufficiently in and developing its permanent staff to create an in-house capability, to build corporate knowledge, and to ensure continuity

and consistency. One SCS observed: “I would much rather have substantive civil servants than contractors. This would help avoid the loss of knowledge within the civil service and build on lessons learned”. Another SCS, reflecting on the resources allocated to the large sites programme compared to asylum support, complained that “there was a system to support 65,000 [asylum seekers] that went up to 110,000. However, the resourcing for my team was practically flat. There was no opportunity to redesign the system and to re-tool our teams.” Meanwhile, a senior manager also questioned how the new contracted staff had been onboarded, stating: “We brought in loads of people at pace, and we haven’t taken the time to build their development pathway or to see if they have the skills to deliver.”

Engagement with stakeholders and partner agencies

Asylum Support Resettlement and Accommodation Engagement Hub

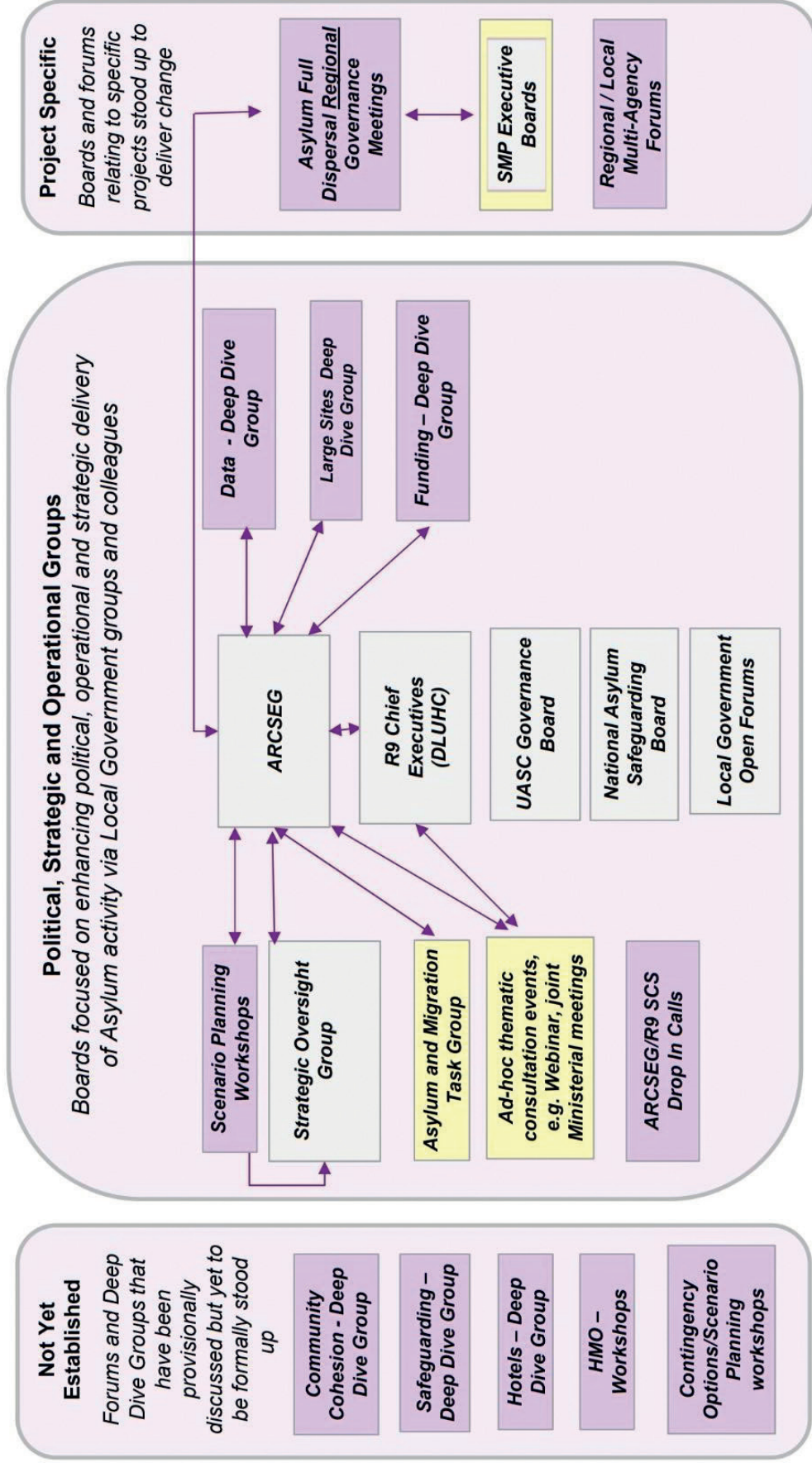
6.14 The structures for stakeholder engagement relating to contingency asylum accommodation (CAA) were set out by ASRA’s Engagement Hub (the Hub). The Hub oversees a number of “strategic engagement channels” and aims to maintain the directorate’s profile with “a broad range of internal and external stakeholders”. The

Hub's work is organised into six workstreams: local authorities, Strategic Migration Partnerships (SMPs), non-governmental organisations (NGOs), devolved governments, other government departments (OGDs), and the United Nations High Commissioner for Refugees (UNHCR).

Local authorities

6.15 At the highest level, local authorities are represented by the Local Government Association (LGA) at the Strategic Oversight Group (SOG), chaired by the Second Permanent Secretary (see figure 12). This functions as a high-level oversight forum for both short- and long-term issues relating to asylum accommodation. In addition, an Asylum Resettlement Councils Senior Engagement Group (ARCSEG), jointly chaired by the Home Office's Asylum Support Director and the Chief Executive of the LGA, meets quarterly to discuss more localised issues, such as the concerns of local organisations.

Figure 12: Home Office engagement structures with local authorities at December 2023⁷⁴



74 DLUHC: Department for Levelling-Up, Housing and Communities

- 6.16** The Asylum and Migration Task Group is made up of representatives from local authorities. The group, chaired by the Immigration Minister, meets bi-annually to discuss the political aspects of how asylum seekers are accommodated. The minister is joined by the Director of ASRA, when required, to provide support on policy issues.
- 6.17** Local authorities are also represented in Asylum Full Dispersal Regional Governance meetings, which began in 2022, following an initial consultation on full dispersal.⁷⁵ These meetings are chaired by the Deputy Director for Asylum Support. The Home Office has established three Deep Dive Groups with local authorities where there are actions arising from strategic groups such as the ARCSEG or the SOG. These consider issues such as data, funding, and large sites.

Strategic Migration Partnerships

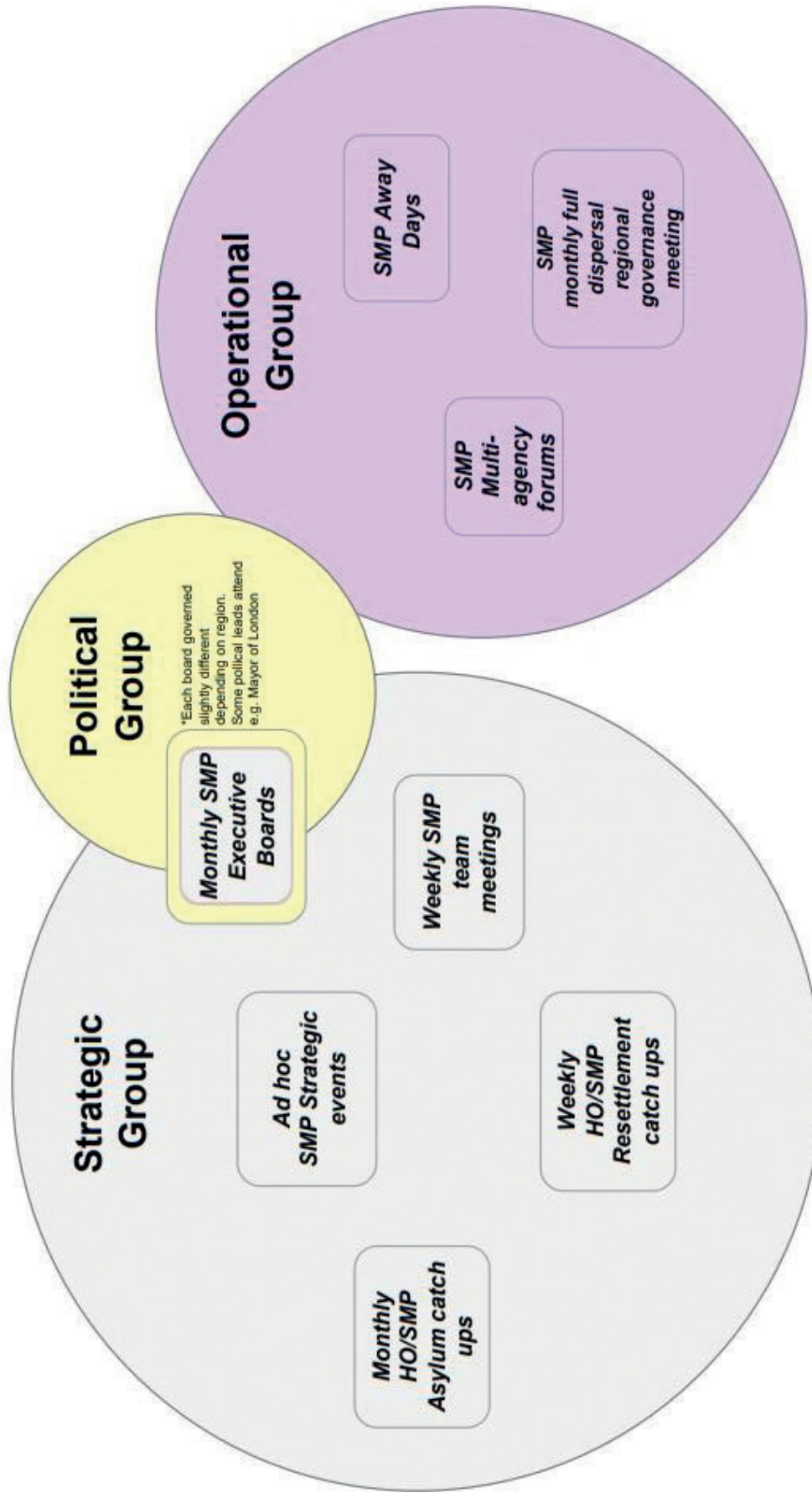
- 6.18** There are 12 Strategic Migration Partnerships (SMPs). They are organised on a regional basis and cover the whole of the UK, including the devolved administrations, and involve the local

⁷⁵ 'Asylum Full Dispersal' is the policy of dispersal of those seeking asylum accommodation in the UK introduced by the Immigration and Asylum Act 1999. The legislative intention was that, by distribution across the country, no one area would be overburdened by the obligation of supporting asylum seekers.

authorities in that region. The Home Office funds SMPs to co-ordinate, support, and deliver participation in the asylum dispersal scheme, the refugee resettlement schemes, the national transfer scheme for unaccompanied asylum-seeking children (UASC), and co-ordination of English language training for eligible migrants. SMPs facilitate and enable collaboration between central and local government, civil society, and regional and local stakeholders for the benefit of both migrants and the wider community. Senior Civil Servants (SCS) attend Executive Boards of SMPs, which consider strategic issues (see figure 13).⁷⁶

76 At the time of the inspection, there was no SMP in Northern Ireland, and the work of the SMP (asylum dispersal only) was undertaken by the Home Office with support from the Executive Office in Northern Ireland.

Figure 13: The Home Office's engagement with SMPs



- 6.19** There are monthly catch-up meetings for both asylum and resettlement where Home Office/SMP Asylum Support staff meet with SMPs to discuss local issues around asylum accommodation, and topics that touch other aspects of migration. ASRA also organises away days for SMPs to reflect on the previous year's issues and the direction for the year ahead.
- 6.20** Multi-Agency Forums (MAFs), chaired by the SMP, were established by the Home Office to keep all strategic partners informed about a new accommodation site, from initial development through to the end of its use. MAFs enable the Home Office to work through specific challenges in detail with the relevant local agencies.

Devolved governments and other government departments

- 6.21** There are a number of groups where the Home Office engages devolved governments and OGDs on political, operational, and strategic delivery issues related to asylum. The groups include the Wales Refugee and Asylum Seeker Taskforce, the Northern Ireland Strategic Planning Group, the Home Office/HM Treasury Board, the Legal Aid Agency/Home Office Bilateral Strategic

Group, and the National Asylum Seekers Health Steering Group.⁷⁷

Non-governmental organisations

6.22 The Home Office engages with NGOs at a strategic level through subgroups of the Asylum Strategic Engagement Group (ASEG) which cover specific topics relating to the asylum process, including children, equalities, integration, move-on, and asylum support. These are co-chaired by Home Office staff and subject matter experts from NGOs. A new forum, the Asylum Lived Experience Advisory Panel (ALEAP), comprising individuals who have been through the asylum journey, has been set up to feed into strategic discussions at the ASEG.

Stakeholder engagement for new hotels

6.23 When the Home Office secures approval from ministers for a hotel or other accommodation to be stood up for contingency asylum accommodation, the local authority Chief Executive and local MP are notified by email. A standard operating procedure specifies this notification should

⁷⁷ At the time of the inspection, the Home Office was in the process of reviewing its engagement with devolved nations. At the time, there were engagement forums for Wales and Northern Ireland, but none for Scotland.

be given at least 48 hours before the site is to open. The region's SMP will then contact key local authority personnel to arrange an initial meeting to engage with key local stakeholders and partners to discuss the proposed site. The Home Office's Engagement Lead for the site will attend this meeting and deal with any follow-up actions arising.

- 6.24** If a hotel is found to be unsuitable, the Engagement Lead will write to the local authority Chief Executive and the local MP to inform them the Home Office will not be pursuing it.

Stakeholder engagement for large sites

- 6.25** The establishment of contingency asylum accommodation (CAA) facilities on surplus military sites, like RAF Scampton and Wethersfield, requires extensive engagement with stakeholders.
- 6.26** A Home Office senior manager described the phases of engagement for large sites:
- “Phase One is in-confidence conversations between the Minister and the local MP beforehand and taking down their concerns. The SMP would be involved too, to gather information on the local migration landscape”

- “Phase Two is the local authorities, police, fire and rescue, NHS England, Integrated Care Board (ICB), the UK Health Security Agency (UKHSA), to get their initial key thoughts (which are mostly concerns about the impact on local services and requests for funding)”
- “Phase Three is a (monthly) multi-agency forum (MAF) bringing together all the key stakeholders and other local interested parties and (operational) subgroups for different areas, including health, community safety and infrastructure, dealing with specific things like community tensions. They feed up into the bigger MAF”

6.27 The Home Office provided an ‘iterative’ communication plan for the RAF Scampton site, dated 30 June 2023, as an example of how communications are conducted for a large site. The objectives of the plan include raising awareness, providing information, offering reassurance, educating stakeholders about the proposed site, and promoting integration with the local community once the site goes live. The plan outlines an incremental approach, with increasing levels of engagement as more information is disclosed and plans are refined. It divides engagement into “hyper local” for neighbours of the proposed site, “wider community” for the surrounding residential areas, and “regional and

national” for wider messaging, such as through the media.

- 6.28** The principles of the plan are to provide “factual information, consistent narrative and more detail as it becomes available”, Engagement is a mixture of face-to-face and online meetings, written correspondence, newsletters, and fact sheets.⁷⁸ Engagement with major stakeholders, charities, and NGOs is through the MAF.
- 6.29** The communications plan sets out key messages to be communicated about the site for different audiences relating to who will be accommodated there, screening and suitability checking prior to arrival, site opening and facilities, safety and security, and roads and transport. The actions in the Scampton communications plan ended in August 2023, and some details, such as identification of voluntary sector groups and transport provision, had yet to be provided at December 2023.
- 6.30** A Home Office senior manager with responsibility in this area told inspectors that the communications and engagement had been an

78 Information about asylum accommodation sites including Bexhill, Manchester Road (Huddersfield), Portland Port (Bibby Stockholm barge), RAF Scampton and Wethersfield is provided at: <https://www.gov.uk/government/collections/asylum-accommodation>

opportunity to “myth bust” with local people and that meetings with ministers had been a useful way to present factual information. They were also an opportunity to take away lessons in how the use of large sites affects local communities.

Stakeholder feedback on engagement

6.31 A national organisation representing local authorities, in a written contribution to this inspection, stated that the Home Office’s engagement with interested parties was “one-way” and that discussions did not lead to their concerns being addressed:

“A common concern expressed ... was the lack of substantive consultation with local authorities before a decision on establishing a contingency accommodation site or bringing in a large number of arrivals has been made. There is a sense that councils are simply told what is happening rather than being adequately consulted, and that their local knowledge is unappreciated. For instance, when asked about the capacity of local health services, local information and local challenges are ignored and very few solutions to how a situation can be managed were offered.”

6.32 Some stakeholders felt this lack of engagement and partnership working had continued during the

time the sites in their area had been active, which was reflected in the following comment:

“Whilst the Home Office, and their contractor, do regularly speak with local authorities, these conversations do not seem to create change or address the concerns being raised.”

6.33 Another group of local authorities commented on the lack of notice given when hotels were to be emptied and the ‘service users’ moved on. This makes it particularly difficult for local authorities to plan the resourcing of their services to support asylum seekers.

Conclusion – leadership and management of operations

6.34 Efficient and effective management of existing contingency asylum accommodation sites and work to identify and develop large sites have been hampered by a lack of clear ownership and accountability at senior levels within the Home Office, exacerbated by frequent changes in people and roles. This led to duplication of effort and missed opportunities to learn from previous experiences of setting up and running former Ministry of Defence sites, such as Napier Barracks. It has also impacted on the effectiveness of the Home Office’s engagement with stakeholders, such as local authorities, who

have a key role in supporting service users as well as meeting the needs of their local community.

6.35 Significant effort has gone into creating structures for engaging stakeholders regionally and locally, but the perception is that communication is too often belated and one-way. The criticism that the Home Office is a poor communicator, and especially a poor listener when stakeholders raise concerns, is not new, nor is it confined to contingency asylum accommodation. The department has a huge challenge in persuading both those it relies on for support and its critics that it is open and honest in its dealings, and any reluctance, whether real or perceived, to share information about plans for or the running of contingency asylum accommodation sites will be seen as evidence that it is not.

7. Inspection findings: Assurance processes

Introduction

- 7.1** The Independent Chief Inspector of Borders and Immigration’s (ICIBI’s) 2021 inspection of contingency asylum accommodation noted that the assurance strategy for contingency asylum accommodation was set out in the ‘Service Delivery and Contract Assurance Framework’ and was based on a ‘three lines of defence’ assurance model.⁷⁹ This document was provided again in evidence for this inspection and did not appear to have been updated or changed. The document explained how the three lines of assurance were defined.
- 7.2** The Home Office’s Accommodation and Support Contracts – Assurance (ASC-A) team should undertake first-line assurance by completing assurance visits to contingency asylum accommodation. According to the framework document, the purpose of assurance visits is “as much to assure that the service providers are undertaking their inspections and carrying out their

79 ICIBI, ‘An inspection of contingency asylum accommodation’.

processes correctly, as they are to identify defects and issues in the properties”.

- 7.3** The Home Office’s Strategy, Transformation and Performance Central Operations Assurance Team (STP COAT) should undertake second-line assurance. The 2021 ICIBI inspection found that no second-line assurance had been undertaken, as “processes would need to be in more of a steady state before it would be sensible to design the second-line checking model”.⁸⁰ No evidence was provided for this inspection to suggest any second-line assurance had begun since the 2021 inspection.
- 7.4** The Home Office regards the scrutiny by external bodies as third-line assurance. Alongside the ICIBI, this included organisations such as the Government Internal Audit Agency, the Infrastructure and Projects Authority (IPA), the Home Affairs Select Committee, the National Audit Office, and the United Nations High Commissioner for Refugees. The 2021 ICIBI inspection noted that “this view of third-line assurance does not align with definitions of assurance frameworks used by government and professional bodies”.⁸¹

80 ICIBI, ‘An inspection of contingency asylum accommodation’.

81 ICIBI, ‘An inspection of contingency asylum accommodation’, page 30, para 6.56.

Stakeholder concerns regarding assurance

7.5 Stakeholders raised concerns in relation to accommodation standards and poor living conditions, suggesting the assurance regime was not as effective as it could be. For example, London Councils wrote an open letter to the Home Affairs Select Committee, dated 2 February 2024, sharing concerns in relation to asylum accommodation. This letter stated they “would welcome an examination of the capacity and outcomes of the Home Office Assurance Team”.⁸²

Internal assurance, compliance visits, and inspections

7.6 Under the Asylum Accommodation and Support Contracts (AASCs), “service providers shall manage and maintain ‘service user’ accommodation to the required property standards”. These include requirements that accommodation is safe, habitable, and fit for purpose as set out in Annex B of the Statement

82 Letter from London Councils to the Home Affairs Select Committee regarding asylum and migration dated 2 February 2024, (published 21 February 2024). <https://committees.parliament.uk/publications/43402/documents/215975/default/>

of Requirements (SoR) in Schedule 2.⁸³ The AASCs are designed to be self-reporting, so service providers provide data to the Home Office to provide assurance that the standards are maintained. However, the Home Office ASC-A team undertakes targeted assurance of providers by visiting contingency hotel accommodation and ‘other’ sites, with the exception of Napier Barracks.⁸⁴

7.7 The ASC-A team does not have responsibility for assuring accommodation sites which are part of the Asylum Accommodation Programme – Non-Detained (AAP-ND), formerly the Large Sites Accommodation Programme. At the time of this inspection, the only active AAP-ND sites were the Bibby Stockholm and Wethersfield. Assurance activity for these two sites was being conducted by the onsite Home Office teams through action plans arising from external assurance reviews, such as those conducted by the IPA.

7.8 Napier Barracks appeared to fall outside the assurance regime of both the ASC-A team and the AAP-ND team, by virtue of being a military site that was not part of the large sites

83 UK Parliament, ‘Asylum Accommodation and Support: Schedule 2, Statement of Requirements’.

84 UK Parliament, ‘Asylum Accommodation and Support: Schedule 2, Statement of Requirements’.

programme. However, like the Bibby Stockholm and Wethersfield, Napier Barracks does have a Home Office presence on site most of the time. The Home Office did not provide any evidence for this inspection in respect of assurance activity completed for Napier Barracks, although, when inspectors visited the site on 16 January 2024, they were told that a Home Office visit had taken place in June 2023 and that “94 jobs [items requiring attention] arose from this inspection”. Inspectors found it concerning the Home Office was unable to evidence its assurance activity of Napier Barracks, given this number of actions and the potential to learn and apply lessons across the contingency asylum accommodation (CAA) estate.

7.9 A standard operating procedure (SOP), issued in October 2020 and updated in November 2022, details the process for the ASC-A team assurance visits and how they are targeted. All properties must meet the Statement of Requirements (SoR) set out in Schedule 2 of the AASC.^{85,86} All assurance visits undertaken by the team consider

85 UK Parliament, 'Asylum Accommodation and Support: Schedule 2, Statement of Requirements'.

86 Department for Communities and Local Government, 'Housing Health and Safety Rating System: Guidance for Landlords and Property Related Professionals' (published 26 May 2006). <https://www.gov.uk/government/publications/housing-health-and-safety->

induction, health and safety, accommodation standards, catering or alternative arrangements, and other services and activities. However, the approach taken in terms of frequency of assurance visits differs according to whether the sites are permanent or taken on temporarily, even where these temporary sites have been in use for some years.⁸⁷

7.10 The November 2022 SOP details that the ASC-A team aims to visit permanent sites at least once every three months. However, as a result of the COVID-19 pandemic and the increase in contingency asylum accommodation sites, since 2020 this had been reduced to at least once every six months. Temporary sites should be visited within a couple of months of being brought

rating-system-guidance-for-landlords-and-property-related-professionals

87 In its factual accuracy response, the Home Office stated: "In June-July 2023 [we] introduced a consistent target of inspecting all IA [initial accommodation] (core and contingency) sites at least every 6 months and commenced recruitment of additional staff to enable this. It took several months then to reach the target (i.e. to have inspected each establishment within the previous 6 months). The target was finally met in April 2024, during the period of the ICIBI's inspection. Since then, all IA establishments have been inspected at least every six months."

into use, and assurance visits are then repeated in response to specific intelligence or where a site has not been inspected “for a considerable period”, although this period is not defined.⁸⁸

7.11 The ICIBI 2021 inspection recommended that the ASC-A be resourced “to maintain a programme of quarterly intelligence-led inspections (in line with the Service Delivery and Contract Assurance Overview) of all contingency and initial accommodation sites”.⁸⁹ The Home Office accepted this recommendation and indicated it had undertaken a review of the role and resources of the ASC-A team, and was “in the process of recruiting to the additional posts”.⁹⁰ However, during interviews for the current inspection, Home

88 In its factual accuracy response, the Home Office stated: “Temporary sites were visited within a couple of months of being brought into use, and the ASC-A team had in June-July 2023 also introduced a target to re-inspect each site every 6 months thereafter. Meeting this target involved recruiting and training considerable extra resource and it took until April 2024 for the target to be met.”

89 ICIBI, ‘An inspection of contingency asylum accommodation’ <https://www.gov.uk/government/publications/an-inspection-of-contingency-asylum-accommodation>

90 Home Office, ‘Response to the ICIBI’s report: “An inspection of contingency asylum accommodation”’.

Office staff told inspectors that the team was only nearing its full complement of staff in January 2024, and many staff were new recruits and remained in training.⁹¹

7.12 Intelligence to support a dispersal accommodation site's selection for an assurance visit is based on performance data provided to the Home Office by service providers, together with data on requests for assistance from service users, maintenance issues, and complaints raised through Migrant Help under the Advice, Issue Reporting and Eligibility (AIRE) contract.⁹² The ASC- A team

91 In its factual accuracy response, the Home Office explained that following the 2021 ICIBI inspection it conducted a review and assessed “a consistent six-monthly target across all forms of IA [initial accommodation] would be appropriate”, following which it ‘closed’ this recommendation. The Home Office fully accepted the recommendation that there should be a “quarterly” inspection regime in its formal response, published on GOV.UK. A six-monthly regime, which has taken three years to deliver, and which has not been published, does not meet the letter or spirit of the original recommendation.

92 Home Office, AIRE - Advice Issue Reporting and Eligibility contract (published 17 March 2022)_ <https://www.contractsfinder.service.gov.uk/notice/523e7af0-cbcd-4dfb-ad49-93aff52965de?origin=SearchResults&p=1>

decides which properties to 'task' for an assurance visit by scrutinising the available intelligence, taking account of the services which have to be provided according to the detailed specification set out in the SoR for the contract.⁹³ As an example, a complaint about overcrowding might lead to an inspection assurance visit being tasked, as this links to standards set out in the SoR. Meanwhile, a complaint about the lack of Wi-Fi might not lead to an assurance visit as this is not a specified requirement. However, there is no formal scoring system, so decisions are to an extent subjective. For initial and contingency accommodation sites, the ASC-A team uses an internal tracker to identify when properties are approaching the target to be inspected every six months, and this is the basis for scheduling inspections. If intelligence is received by the ASC-A team that would indicate that a property should be inspected before the six-month target, consideration will be given to scheduling the inspection sooner.

7.13 During ICIBI inspection visits to CAA sites, both service users and service providers informed inspectors that they usually tried to resolve issues between themselves, primarily because it could be difficult to contact Migrant Help, with long wait

93 UK Parliament, 'Advice, Issue Reporting and Eligibility Support: Schedule 2, Statement of Requirements' (committed on 12 November 2018).

times for a response reported.⁹⁴ This caused inspectors to query whether the Migrant Help data could accurately reflect sites of concern. However, in interview, a Home Office manager accepted that waiting times could be long, as Migrant Help could receive 1,000 calls per day, but refuted that service users went to the service provider directly.

“My experience is that very few people go through service provider directly. People have it ingrained in them correctly to go through Migrant Help. I see that people are utilising [it] correctly and the ASC-A team use all the Migrant Help data. I feel it is really rich.”

7.14 On 23 November 2023, inspectors requested the reports or outputs resulting from Home Office assurance visits or third-party inspections, and

94 In its factual accuracy response, the Home Office noted: “Migrant Help have significantly increased their capacity at their First Response Centre over the duration of the AIRE contract, in June 24, they answered calls on average in 1 minute 46 seconds. This helpline manages all issue reporting (the categorisation and logging of maintenance issues, requests for assistance, complaints, SU feedback), take responsibility for raising asylum support issues and can handle some advice and guidance queries. They also have a web chat service and a service user portal to increase their ability to manage the SU demand.”

lessons learned exercises, undertaken since 1 January 2023. At the time of the inspection, the Home Office did not provide inspectors with an overarching document that identified when each of the sites in operation had received an assurance visit, or that tracked when the next visit was due. Inspectors were therefore unable to ascertain the number of assurance visits undertaken against the frequency targets.⁹⁵ Of the 29 CAA sites selected for inspection by the ICIBI, 25 fell to the ASC-A team to assure. Of these, 21 had been visited by ASC-A at least once between January and November 2023, three more had received initial visits but not during this period, and one had not been visited at all. The CAA sites not visited during this period included sites that accommodated several hundred service users, as well as sites used to house families, children, and service users with disabilities. Furthermore, while issues and concerns were highlighted by the ASC-A team in its visit reports, the reports did not record the remedial action required, whose responsibility this

95 The Home Office provided a log of all ASC-A inspections with dates as part of its factual accuracy response, explaining that it was in place at the time of the inspection. The log is used to track when the next six-monthly visit is due.

was, or the timescale within which it should be completed.⁹⁶

- 7.15** During interviews, Home Office staff advised that, where potential “non-conformance” issues against the SoR were identified through assurance visits or intelligence received, they were recorded in a findings log. Home Office staff reported this log was then used to communicate with the service providers and hold them to account against the Key Performance Indicators (KPIs) in the contract.
- 7.16** The Home Office provided copies of the findings logs opened in mid-October 2022, which were used to record issues identified across both dispersal accommodation and CAA during ASC-A property inspections. Issues identified during a site visit or through intelligence would not progress as a non-conformance issue under the AASCs if they were subsequently resolved by the

96 In its factual accuracy response, the Home Office explained: “It is the provider’s responsibility to ensure findings are acted on and the reports are sent to them for this purpose. Also, it is the provider’s responsibility to decide on what course of remedial action to take (with some issues there is an obviously ‘right’ answer whereas for others it is for the provider to decide between different potential methods of resolution). And the contractual timescales apply, for all matters which they cover.”

provider within expected KPI timeframes.⁹⁷ Like the assurance visit reports, the logs did not record the remedial action required, whose responsibility this was, or the timescale within which it should be completed. There was no requirement to provide the reasoning where issues were deemed not to be potential non-conformance.

7.17 From the findings logs, examples of issues raised that were not taken forward as non-conformance issues included light bulbs in need of replacement, mould gathering around a sink in the kitchen, and exposed wiring coming out of a hole in the wall next to a plug socket which would be in reach of a child. Examples of issues raised that were taken forward as potential non-conformance included insufficient dining chairs and soft seating, a child over the age of ten sharing a bedroom with her parents which was too small, and actions from fire risk assessments not being completed within the required timescales.

97 In its factual accuracy response, the Home Office explained: “Many issues raised are not contractual non-conformances. For example, a newly spotted maintenance issue is not a non-conformance as the provider has a target timescale to fix it, whereas a pre-existing maintenance issue that has not been fixed within the target timescale will be a non-conformance.”

7.18 Analysis of the findings logs showed that issues relating to CAA accounted for 22.52% of all issues identified across the AASCs (1,896 of 8,420 issues). Of the issues relating to CAA, 58.18% were considered to be potential non-conformance (1,103 of the 1,896). The logs provided columns for the Home Office to record quality assurance against these issues. However, based on what was recorded, only a small number of the potential non-conformance issues appeared to have been followed up – 20 out of the 1,103 or 1.81%. Of those followed up, none of the logs included comments to explain the action taken or confirm that the issues were satisfactorily resolved. Many issues had no further action recorded at all.⁹⁸

Service providers assurance process

7.19 In addition to Home Office assurance, service providers conduct their own assurance checks of accommodation and performance against the contract. Service provider assurance occurs for

98 In its factual accuracy response, the Home Office explained that “follow up action was not intended to be recorded on the findings logs. Potential non-conformances from the findings log are followed up with the provider as part of the monthly KPI assurance activity, which is a separate process.” It did not provide figures for how many potential non-conformance issues had in fact been followed up.

both contingency hotels and ‘other’ sites, including Napier Barracks. However, at the end of 2023, assurance arrangements were not yet in place for the Bibby Stockholm barge, as KPIs had not been agreed. Service Provider assurance for Wethersfield commenced in January 2024.⁹⁹

99 The Home Office provided an update on the position with KPIs as at June 2024: “The KPIs that are applicable to Wethersfield and Napier are KPIs 1, 4, 5, 6, 7, 8 and 9 from the overarching contract (schedule 13). There have been no KPI failures reported against these measures for Wethersfield or Napier since January. These KPIs are currently under review to improve the measures so that they are more applicable to the performance of a large site. Separately on performance management, we have introduced site-specific governance at Wethersfield to manage any contractual performance issues as they arise. This will shortly be expanded and become a Large Sites Contract Management Group to include Napier.” In its factual accuracy response in August 2024, the Home Office stated that “service provider assurance for the Bibby Stockholm commenced in March 2024, following the agreement of the site specific KPI regime in February 2024. Since March 2024, the Bibby Stockholm service provider has provided monthly reporting against KPIs which is reviewed by Home Office Service Delivery and Commercial staff at the monthly Contract Management Group meeting. Service Provider assurance for

7.20 Service providers are expected to provide monthly assurance reports to the Home Office against the contract KPIs. However, there were slight variations in how each service provider discharged this responsibility. Staff at sites of one service provider advised that their organisation did their own health and safety checks every six to twelve weeks, with weekly checks performed by onsite staff checking general cleanliness, window restrictors, smoke detectors, lighting, and other items. Onsite staff at another service provider reported doing monthly room checks and being subject to compliance checks based on the KPIs in the contract by their own organisation. Contracted staff at the third provider reported assurance via operational audits by the service provider, with some sites being audited twice a month.

7.21 In its evidence for this inspection, the Home Office provided a sample of each service provider's monthly assurance reports from between 1 January 2023 and 31 September 2023. These self-reports showed that providers considered their level of non-conformance with KPIs to be zero or very low. However, inspectors noted that the providers were making a subjective assessment which could potentially have negative contractual

Wethersfield commenced in January 2024, with monthly KPI and service performance reports now provided.”

consequences, and there was little incentive for service providers to report KPI breaches.

- 7.22** Home Office staff observed that the AASCs were awarded before hotels came into widespread use as CAA, and that the KPIs were initially designed for dispersal accommodation.

Contract management

- 7.23** Service providers were perceived to be “good partners” by senior civil servants (SCSs), who recognised their willingness to assist by undertaking work outside of the contract, often at short notice, in response to the dynamic environment within which they were operating. Conversely, SCSs also recognised that, without a clear strategy, the Home Office was not able to act as an “intelligent client”, that the department did not have “enough of a grip on providers”, and that it had become “distracted by external engagement with other agencies, resulting in a loss of focus on the core responsibility of holding providers to account”. Moreover, SCSs said that there were improvements in performance that providers acknowledged they needed to make, but the AASCs in their current form made it difficult to hold providers to account.

- 7.24** The November 2023 Asylum Support, Resettlement and Accommodation (ASRA) risk register rated the Home Office’s “inability to deal

with provider non-compliance in relation to [one provider's] AASC contract" as a high risk. The Home Office considered there was "extensive overcrowding, non-compliance with licensing requirements and sharing rules, and questionable maintenance in the [provider's] estate". The risk register suggested this was exacerbated by false reporting and restricted access to provider systems, severely limiting the Home Office's ability to understand the extent of the problems. Although remedial action was being taken to work with the provider in question to improve its performance, it was "likely formal default action and/or dispute processes" would be needed. However, Home Office staff indicated that, to their knowledge, few, if any, service credits had been applied in relation to service provider failures.¹⁰⁰ This raised questions around the robustness of contract management and an apparent reluctance to seek redress, despite the significant contract costs involved.

7.25 The AASCs have been routinely amended via Change Control Notices for reasons of expediency, enabling service providers to deliver the operation

100 A service credit is an agreed deduction from the cost of contract in response to a service provider's failure to meet the performance standards set out in their contract.

and maintenance of new sites.^{101, 102} However, by not seeking to tender for new contracts, the potential to deliver better value through a fresh competition was not explored.

- 7.26** Home Office staff explained to inspectors how contract management teams within Asylum Support initially lacked the necessary commercial knowledge, expertise, and experience to manage contracted providers effectively. One senior manager highlighted that, although they had started to upskill, there was an existing need to ensure that providers “ultimately motivated by profit, were not pulling the wool over our eyes”, for example by not securing sufficient dispersal accommodation in particular regions, as it was not profitable for them to do so, leading to the disproportionate procurement of accommodation in some geographical areas compared with others.
- 7.27** The evidence provided by the Home Office demonstrated that the provider self-reports were discussed at monthly contract management group meetings and considered alongside the findings

101 Change Control Notices are used to detail agreed variations to an original contract and usually take the form of an annex to the original contract.

102 NAO, ‘Investigation into asylum accommodation’ (published 20 March 2024), p.11. <https://www.nao.org.uk/reports/investigation-into-asylum-accommodation/>

of Home Office assurance visits and Migrant Help data. The contract management group meeting notes provided to inspectors suggested that assurance of the contract is more of a review of data by the Home Office and service providers, where agreement is reached, rather than a robust analysis, assessment and discussion about performance. Where agreement is not reached, it can be discussed at the quarterly Strategic Review Management Board between the relevant provider and the Home Office. Where an issue remains, the Home Office commercial team discusses it with the provider, which may involve remedial action plans and the application of service credits.

7.28 At Wethersfield, service provider self-assurance was monitored through the onsite Home Office service delivery team. No assurance visits of Wethersfield had taken place by a Home Office team that was independent of the operation, but the Home Office provided evidence to support the reviews undertaken by the Infrastructure and Projects Authority (IPA), and input into the 'Go/No go' approval process – the process which supports the decision whether or not to proceed with a site going live. KPIs were agreed at service commencement but reported as part of wider AASC reporting prior to January 2024. This made it difficult to assess performance at Wethersfield. In January 2024, Wethersfield-specific monthly

governance calls started. In May 2024, these were expanded to include reporting for Napier.

7.29 At the Bibby Stockholm, the subcontracted provider told inspectors that its heads of department met three times a week, on Mondays, Wednesdays, and Fridays, to discuss operational matters. However, the subcontractor advised they could not speak to the assurance conducted by the contracted service provider, CTM. Similar to Wethersfield, the vessel has an onsite Home Office service delivery team, who advised that they held regular compliance reviews with CTM, and that their presence allowed them to “look at [performance] in real time”. However, as at 17 January 2024, the KPIs for the Bibby Stockholm contract had not been finalised, despite the site being in operation since August 2023. The provider could therefore not be effectively held to account for performance. In February 2024, a Home Office manager told inspectors that the agreement of KPIs for the Bibby Stockholm “was imminent” and would provide the “contractual lever to manage provider performance more consistently”.

External assurance review – Infrastructure and Projects Authority

7.30 The Infrastructure and Projects Authority (IPA) conducted Project Assurance Reviews (PARs) for

the Asylum Accommodation Programme – Non-Detained (AAP-ND), formerly the Large Sites Accommodation Programme, in December 2022, February 2023, and September 2023.^{103,104}

7.31 In the most recent PAR (September 2023), the Home Office received a ‘red’ RAG (Red, Amber, Green) rating (‘appeared unachievable’) for delivery confidence in the AAP-ND (see figure 14 for RAG descriptions). The main reason given was that the programme had a history of trying to meet top-down targets without realistic and deliverable plans, which led to missed milestones and significant delivery risks with no contingency plans in place. The IPA found that the assumptions underlying the large site expansion plans were ambitious and lacked implementation detail with no ‘test and learn’ approach in place to manage increasing occupancy levels safely. Furthermore, governance was still evolving and there was a need to “move from tactical delivery to a more strategic approach” to ensure that the “programme understands wider departmental strategic direction and dependencies with other programmes”. However, the IPA recognised that the programme had a dedicated and hard-working team, who had

103 See the website for the Infrastructure and Projects Authority: <https://www.gov.uk/government/organisations/infrastructure-and-projects-authority>

104 The IPA reviews are not in the public domain.

very demanding delivery targets in a complex and highly sensitive operating environment.

Figure 14: Definitions of the IPA’s Red, Amber, Green (RAG) status

Colour	Criteria description
Red	Successful delivery of the programme to time, cost, and quality appeared unachievable. There were major issues which, at that stage, did not appear to be manageable or resolvable. The programme may have required re-baselining and/or its overall viability reassessed.
Amber	Successful delivery of the programme to time, cost, and quality appeared feasible but significant issues already existed which required management attention. They appeared resolvable at that stage, if addressed promptly, and should not present cost/schedule overrun.
Green	Successful delivery of the programme to time, cost, and quality appeared highly likely and there were no major outstanding issues that at that stage appeared to threaten delivery.

7.32 Inspectors found that the Home Office had responded positively to the issues identified by the IPA and was improving accountability for delivery through its action plan to address all recommendations. However, at 27 December 2023 ‘critical’ recommendations remained outstanding regarding target setting, updating the draft Programme Business Case, developing a plan for the ramp-up of each large site, and meeting the Town and Country planning requirements for each

site with input from other government departments on lessons learned.

7.33 In an update on 27 June 2024, the Home Office provided the latest IPA assessment (from February 2024), which included an amber RAG rating for delivery confidence. The IPA identified some areas of best practice, including a collaborative culture across the programme and with key stakeholders, the capability and professionalism of staff, and very high-quality programme/project documentation. The assessment made seven essential recommendations, which the Home Office should complete between February and June 2024, including developing and communicating clear roles and responsibilities across the programme. The Home Office did not share progress against these recommendations.

Conclusion – assurance processes

7.34 The Home Office reports that it has a ‘three lines of defence’ approach to assurance of contingency asylum accommodation. In reality, it has not gone as far in improving its assurance processes as the ICIBI recommended was needed in its 2021 inspection of contingency asylum accommodation, and has moved much more slowly than the ICIBI had indicated was necessary when first inspecting this area in 2018, when it recommended

that before the current asylum accommodation contracts were let the Home Office should:

“Review the role, size, structure, geographical distribution, workload and performance targets of the Contract Compliance Team, and confirm it was “fit for purpose”, and staff were fully trained for their roles, and

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

- a. the selection of properties to inspect, including when to follow-up a complaint and when to re-inspect; mandatory completion of risk assessments;
- b. consistent application of Housing Health & Safety Rating System (HHSRS) methodology and the COMPASS contract ‘requirements’;
- c. how to carry out meaningful “pastoral” (welfare) checks, and how to deal with any safeguarding or other issues that arise;
- d. managing relationships with Provider staff.”¹⁰⁵

105 ICIBI, ‘An inspection of the Home Office’s management of asylum accommodation provision,

7.35 The 2018 recommendation was fully accepted, as was the 2021 recommendation that ASC-A be resourced “to maintain a programme of quarterly intelligence-led inspections (in line with the Service Delivery and Contract Assurance Overview) of all contingency and initial accommodation sites”.¹⁰⁶

February – June 2018’, (published 20 November 2018), p.9-10. <https://www.gov.uk/government/publications/an-inspection-of-the-home-offices-management-of-asylum-accommodation-provision>

106 In its factual accuracy response to the current inspection, the Home Office drew attention to its ‘closing summary’ in respect of the 2018 recommendation, dated March 2024, which stated: “We have fully reviewed all aspects of Asylum Support Contract Assurance (ASC-A) unit operation. We have clarified roles, substantially enhanced and restructured the unit. Our new structure has a dedicated SEO-led [Senior Executive Officer-led] operational team responsible for assuring each AASC provider’s performance, supported by two HEOs [Higher Executive Officers] and 12 EOs [Executive Officers]. We have also recruited a Hotel Assurance Team of 12 inspectors to focus on contingency accommodation. We have adjusted the geographical distribution of staff to ensure all areas can be adequately covered, including changing the way we recruit no longer to be to our main offices. We have introduced specialism between inspection and analytical assurance roles. We have built an Intelligence function, supported by a property-centric

7.36 However, while it was clear some first-line

database into which all intelligence about properties is imported (for example, all of the issues raised via Migrant Help are recorded against the property they relate to) and we use this to target and inform our inspections and other assurance work. We have also recruited an Admin Team which is incrementally taking on much of the administration around inspections to free up the EOs to undertake more inspections, and we will be setting new individual/team targets for dispersal inspections as that progresses. We have set unit targets of inspecting all initial accommodation (including contingency) between one and two months of coming into use and then at least six-monthly thereafter, and of conducting inspections of dispersal properties in each local authority dispersal area at least every six months.

We have developed robust new SOPs, tools and templates for both initial accommodation and dispersal accommodation inspections, and guidance and training on these and on important issues such as licensing rules, space standards, and sharing rules, so that inspections can consistently determine whether the properties are compliant. We have also introduced training for all inspection staff on the Housing Health and Safety Rating System (HHSRS) which is provided by the Chartered Institute of Environmental Health and is the national system for identifying and assessing hazards. We have recruited from a local authority a Principal Environmental Health Officer expert in property licensing and housing

assurance of open CAA sites was taking place, the approach was inconsistent, and it was difficult to assess its effectiveness. Inspectors found that

enforcement work, who is leading on further guidance and training.

SOPs are enforced through line management and quality assurance. Properties and areas for inspection are tasked by the Intelligence function and no longer up to individuals to select and include the following up of complaints and reinspection where appropriate. Risk assessments are conducted in accordance with the Safe Systems of Work SOP. Inspections explicitly check compliance with the law and the contract (that properties are licensed where appropriate and that licensing conditions are met; that they are not overcrowded and that the contractual sharing rules are met; that any household-specific requirements are met; that fire safety requirements are met as appropriate; that correct inventory has been provided; and that any previously reported defects have been rectified) as well as checking for current defects. Inspections are also important in managing relationships with providers, and they check the adequacy of the provider's management of the property, and in ensuring that the provider is attending to the service users' welfare, including checking that they have received proper inductions, that issues they have raised have been attended to, and that any safeguarding issues are followed up. All of this is subject to a quality assurance process."

issues were being identified, but it was unclear what action, if any, was being taken and whether the issues were being rectified, and also whether the frequency of assurance visits was sufficient. Some large hostels with mixed cohorts had not received first-line assurance visits, and there was a lack of evidence of assurance activity at Wethersfield, Napier Barracks, and the Bibby Stockholm barge. There continued to be an over-reliance on service providers' self-assurance and inadequate challenge of underperformance.

7.37 Meanwhile, there was no evidence of second-line assurance, suggesting that the Home Office was no closer to reaching a 'steady state' in respect of assuring CAA.

8. Inspection findings: Use of data and management information

Introduction

8.1 This inspection considered the use of data and management information by the Home Office across the contingency asylum accommodation estate, including in relation to the initial allocation of asylum seekers to sites, and their onward tracking. Previous inspections of asylum accommodation have highlighted issues with the lack of effective data systems allowing scrutiny of service provider contract performance and delivery data. This inspection found that the Home Office had made limited progress in developing systems and processes to monitor accurately both contractor performance and operational delivery.

Routing of service users to accommodation sites

8.2 Service providers are responsible for determining which contingency asylum accommodation (CAA) site an individual should be routed to, except in the case of Wethersfield, the Bibby Stockholm barge, Napier Barracks, and RAF Scampton (when

opened).¹⁰⁷ For these sites, the Home Office decides who will be accommodated where, using the suitability criteria from the 'Allocation of asylum accommodation policy'.¹⁰⁸ This policy states that these sites are "for men aged between 18 and 65 only". They are considered not suitable for individuals being processed as part of the Foreign National Offenders (FNO) returns programme, or for those with "a positive reasonable grounds decision, having been referred into the National

107 At the time of this report, RAF Scampton was not open as a CAA site.

108 Home Office, 'Allocation of asylum accommodation policy'.

Referral Mechanism (NRM)”.^{109,110} Several stakeholders raised concerns with inspectors about the risk of service users being placed in inappropriate accommodation before receiving a positive reasonable grounds decision.

109 The latter criterion was implemented following a ministerial submission on 18 August 2023, which acknowledged the change may cause an increase in the number of “claims that asylum seekers who have been victims of modern slavery are potentially in unsuitable accommodation”. As reported in the Independent Chief Inspector of Borders and Immigration's (ICIBI's) inspection of the Immigration Enforcement Competent Authority (IECA), conducted between January and June 2024, existing delays in NRM decision making were exacerbated by an increase in the burden of proof threshold for Reasonable Grounds (RG) decisions, introduced by the Nationality and Borders Act 2022.

110 Section 60 of the Nationality and Borders Act 2022 raised the threshold for a positive Reasonable Grounds (RG) decision, to require “objective evidence” of the claimed slavery or trafficking with effect from 30 January 2023. This was successfully challenged via judicial review, and RG decision making was placed on hold for six weeks until updated Statutory Guidance was published on 10 July 2023. During this period, RG decisions fell outside of the five working-day service level agreement (SLA), and new referrals accumulated, leading to delays in decision making.

- 8.3** The ‘Allocation of asylum accommodation policy’ (version 11) was revised in February 2024. Prior to this the four sites were not considered to be suitable for service users with serious mobility problems or a physical disability, service users with a history of disruptive behaviour, service users who were granted refugee status or other forms of leave to remain in the UK, and service users awaiting removal.¹¹¹
- 8.4** Furthermore, in the previous policy (version 10), Wethersfield, the Bibby Stockholm, Napier Barracks, and RAF Scampton were deemed “not suitable” for those at a “high risk of suicide”. However, in the later version, the four sites were referred to as “may not be suitable” for those with “serious mental health issues where there is a high risk of suicide, serious self-harm or risk to others”. This policy change occurred despite the loss of life on the Bibby Stockholm due to a reported suicide in December 2023.

111 The UK Visas and Immigration's 'Allocation of asylum accommodation policy' was updated most recently on 3 May 2024. This version (version 12) included “policy clarifications on the location of asylum accommodation and the information that caseworkers should consider for those with a disability” . See: <https://www.gov.uk/government/publications/asylum-accommodation-requests-policy/allocation-of-asylum-accommodation-policy-accessible>

- 8.5** To assess suitability, Home Office staff are instructed to consider information held on the department's case working system, ATLAS, including information recorded from the screening interview, and "any notes taken from Manston and Western Jetfoil".¹¹²
- 8.6** Between Wethersfield opening on 12 July 2023 and February 2024, 217 service users had been removed from the site and relocated to other sites for suitability reasons. A Home Office manager told inspectors that, due to a lack of capacity, legal challenges relating to service users' suitability were generally not contested, which had resulted in the movement of a significant number of service users from Wethersfield. Similarly, 12 service users had been relocated from the Bibby Stockholm between its opening on 7 August 2023

112 In its factual accuracy response, the Home Office provided the following clarification: "Wethersfield is the only site that provides immediate accommodation for those who have arrived by small boat, Napier and Bibby would accommodate those transferred from other accommodation such as hotels. There is a particular business allocation rule in place at Napier, Wethersfield and Portland and will be in place at Scampton and Huddersfield where the Home Office will not allocate anyone who has a previous age dispute (at any point in the pre allocation process and even if they were then deemed to be an adult) to any of these sites."

and February 2024, and 46 service users had been relocated from Napier Barracks between January and December 2023 for suitability reasons.¹¹³ This raised concerns about whether the initial screening process was as effective as it needed to be at identifying and flagging up vulnerabilities. A Home Office manager told inspectors that some individuals may not disclose certain circumstances upon arrival in the UK and so their non-suitability for a large site would only be detected once they are placed there.

113 In June 2024, inspectors asked for the latest figures for service users moved from Wethersfield, the Bibby Stockholm, and Napier Barracks between opening of the sites and 1 June 2024 and the reasons for their relocation, and received the following response: “277 service users (SUs) have been relocated due to unsuitability concerns. An additional 67 SUs were relocated to ensure compliance with the SDO Conditions; due to the nature of their relocation, those SUs have not been included in the data provided.” These were taken from “locally managed records”. For Napier a total of 158 had been relocated. However, 38 of these have the reason listed in reference to an asylum decision. Other reasons include: age dispute (1), behaviour (6), Home Office decision – no further details (29), medical (24), safeguarding (47, although six of these were also listed as safeguarding medical). No updated figures were provided for the Bibby Stockholm barge.

8.7 Disputed age assessments were conducted by the Home Office’s National Age Assessment Board (NAAB). In a ministerial submission from June 2023, the Home Office sought to retain its position that large sites were suitable for those individuals assessed as being “significantly over 18”, as opposed to applying a previous rule of only transferring those over the age of 25. Inspectors were concerned that this position did not prevent male children being allocated to large sites, which were designed for single adult males only. A senior manager told inspectors that age dispute cases amounted to approximately 10% of those located in hotels, but it was only 3% of those located in Wethersfield (12 individuals from July 2023 to June 2024). Inspectors subsequently requested details of the number of age dispute cases for Wethersfield and the Bibby Stockholm barge since they opened and a total for all hotels. On 27 June 2024, the Home Office provided the following response for Wethersfield only:

“Our locally managed records indicate that 22 service users (SUs) have claimed to be a minor at Wethersfield. Of those who claimed, 14 SUs departed Wethersfield with Social Services to enable a full Merton Compliant Age Assessment to be carried out – the remaining eight SUs were deemed to be an adult by Social Services during their initial

visit and continued to be accommodated at Wethersfield.”

- 8.8** One service provider tasked a handful of subcontractor staff with the routing process for all of its CAA sites (which accounted for half of all CAA sites in the UK) in addition to their roles of running one of these sites. Upon receipt of the Home Office’s request for a bedspace, service provider staff checked for a vulnerability marker and any recorded safeguarding issues before allocating the service user to any available site. While location preferences could be checked, there was no formal guidance available for these staff to consider when making their routing decisions. Home Office requests were received throughout the day, and routing decisions were managed on local spreadsheets, which listed all CAA sites in the region and their capacities. Upon selection of a site, the routing staff sent their suggestion to the chosen CAA site for agreement. If a service user could not be accommodated, the Home Office’s two other service providers were contacted for availability. The same process was followed for service users’ requests to move sites.
- 8.9** Home Office managers who spoke to inspectors were unaware of the processes service providers were using to route service users to CAA sites.
- 8.10** Inspectors were concerned that there was a lack of formal training and an absence of

formal policies, procedures, and processes for subcontractor staff to follow that would enable routing decisions to be robust and assured. In January 2024, inspectors were told by the service provider (above) that responsibility for the routing process was being removed from the local team and given to one of its central teams.

Use of data and management information to track service users

- 8.11** The Home Office enters a record for every service user onto the department's ATLAS system. This includes personal details, including current UK address. However, Home Office staff acknowledged that it was often difficult to track aggregate statistical data about movement between addresses. Therefore, the Home Office had difficulty readily identifying trends and patterns regarding the overall movement of service users between individual CAA sites.
- 8.12** The limitations of the ATLAS system and how it is being used, including the need for better recording of vulnerabilities and actions, have been highlighted in previous inspections. A Home Office manager told inspectors that work was in progress to be able to "comment on overall trends in safeguarding issues" but, currently, only individual cases could be assessed.

- 8.13** Not all of the information needed to manage asylum accommodation is recordable on ATLAS, and some of the information held on ATLAS is difficult to extract in report form. The Home Office and its service providers have a range of processes to support management of the contingency estate, including keeping records that are not held on ATLAS. This includes a daily flow of occupancy data which is used to check providers' invoices. The Home Office told inspectors that this data is reconciled to ATLAS records.
- 8.14** Each of the service providers used its own system to manage data relating to service users. Each CAA site had daily registers of service users that were reported into central registers for each service provider. The data provided to the Home Office by the service providers was inconsistent and contained inaccuracies. There were also problems with its timeliness. A Home Office manager told inspectors that, even where a service provider maintained "good daily registers", there was a one-week lag in sharing them with the Home Office. This caused problems with data reconciliation, such as identifying service users who were overstaying or had left. Home Office staff reported that a different service provider did not provide timely data, but "poor" provision of data was difficult to contest, as this was not included in the service provider's contract with the

Home Office. Home Office staff acknowledged that “lots of improvements need to be made, and that while information is provided, its usefulness is debatable”.

- 8.15** The 2021 ICIBI inspection of contingency asylum accommodation recommended that the Home Office should “prioritise the delivery of a Home Office data system that provides access to, and effective scrutiny of, all service provider contract performance and delivery data”. This recommendation was accepted by the Home Office. However, two years on, the current inspection found that issues with the Home Office’s access to service provider data persisted.
- 8.16** The Home Office does not maintain a dataset that reflects a single version of the truth. A Home Office manager told inspectors that there was no single owner for the process of recording data for service users in CAA sites. Officials accepted that the use and sharing of CAA data was an area for improvement. The report on Phase One of the project to develop the strategy of contingency asylum accommodation acknowledged that there was “poor” data and management information, and it concluded that the lack of centralised data resulted in “time-intensive manual audits and workarounds”.
- 8.17** The Hub produced and circulated a weekly report relating to the asylum support population. Although

management information reports can be used to guide and inform decisions, one Home Office manager told inspectors that, as the data on the weekly report was collated for internal use only, “any discrepancy is not that serious,” and so the reports were unassured.

8.18 Inspectors found that the Home Office was unable to use data to track service users effectively. This was most concerning, as was the Home Office’s inability to provide inspectors with the number of individuals who have absented themselves from contingency asylum accommodation and subsequently failed to remain in contact with the Home Office. In response to the ICIBI’s request for this figure, the Home Office responded: “This is not something for which statistical information is available. There will/may be line level case details indicating absenteeism but again these are not sufficiently robust for reporting or quantifying.”¹¹⁴

114 In its factual accuracy response, the Home Office explained: “Asylum support recipients are free to come and go from accommodation at any time and can remain away from accommodation for up to 7 days without notice. Individuals can also choose to make alternative arrangements to accommodation themselves. As such the absence from accommodation is not indication of an individual being ‘missing’, or out of contact with their wider asylum process or reporting conditions.”

‘Notice to quit’

- 8.19** Inspectors found the Home Office’s inability to report and manage migrant data effectively on a national scale meant that trends and the extent of some issues were unknown. One example of this knowledge gap concerned what was happening when service users were provided with a ‘notice to quit’ letter.
- 8.20** Once a service user is issued an asylum decision, this triggers a review of support status. If a service user is no longer eligible for support, a separate decision to end support will be issued and prior to the end of the grace period a final notice to quit letter should be sent by the accommodation provider informing them to vacate the CAA site, as accommodation is provided only while an asylum decision is pending.¹¹⁵ Inspectors found discrepancies in when the notices to quit were sent to service users. Some received them before they had received their asylum decision. Others did not

115 Home Office, 'Ceasing asylum support: caseworker guidance' (published 1 October 2009, updated 13 July 2013). <https://www.gov.uk/government/publications/ceasing-asylum-support-instruction> and UK Visas and Immigration, 'Ceasing Section 95 Support instruction' (updated 13 July 2023). <https://www.gov.uk/government/publications/ceasing-asylum-support-instruction/ceasing-section-95-support-instruction-accessible>

receive a letter even after they had received their asylum decision. Site managers told inspectors some service users staying in CAA sites had been granted leave to remain by the Home Office and received biometric residence permits (BRPs).¹¹⁶
¹¹⁷ At one CAA site, a site manager told inspectors that several service users had leave to remain, legally went to work each day, and had not left the site, as they had not received a notice to quit letter.¹¹⁸

116 Indefinite leave to remain is granted by the Home Office to those who are eligible to settle in the UK. See: <https://www.gov.uk/guidance/indefinite-leave-to-remain-in-the-uk>

117 Home Office, 'Biometric residence permits (BRPs)'. <https://www.gov.uk/biometric-residence-permits>

118 In its factual accuracy response, the Home Office explained: "Once an asylum decision is issued, if granted a BRP must be issued and both decision and BRP must be confirmed as delivered before the Home Office can begin the process of discontinuing support. Once a discontinuation notice is issued by the Home Office with appropriate 21- or 28-day notice, accommodation providers will subsequently issue a 'notice to quit' [NTQ] 7 days before the end of the 21- or 28-day grace period. Some service users may receive their NTQ and only then claim not to have received the asylum decision or BRP. Others may receive an asylum decision but be awaiting

8.21 Once a notice to quit letter had been received, some service users failed to vacate their accommodation. Site managers told inspectors that the police were contacted in some of these instances.

8.22 Inspectors asked the Home Office to confirm the number of individuals staying in CAA with a BRP or with leave to remain. The Home Office responded:

“We can indicate the total number of people who have remained in Home Office accommodation beyond the point at which support has stopped. We cannot say definitively how many await resolution of BRP issues or notice to quits (and who are therefore still paid by the Home Office). There are some estimates being developed but [these are] not sufficiently robust to give a reliable figure.”

8.23 There were several factors influencing a service user’s failure to move out of CAA accommodation once their asylum decision had been received. There were the financial and logistical challenges, such as accessing benefits and arranging accommodation. The risk of homelessness was a widely reported concern, and was mentioned by staff working at CAA sites, stakeholders, and local

a BRP and therefore no support discontinuation has commenced.”

authorities. Medical professionals, including at the sites inspectors visited, were also concerned about the detrimental impact to service users' mental health and the risk of suicide.

- 8.24** Inspectors found that the support provided to individuals who had received a notice to quit was inconsistent. Service providers reported that they were not informed by the Home Office when a notice to quit had been served on an individual. As a result, staff at the CAA sites were unable to manage the situation proactively, including sharing information with appropriate statutory agencies where they were aware of safeguarding risks or the potential deterioration of a service user's mental health.
- 8.25** Inspectors found that the Home Office did not systematically collect data about instances when service users failed to move out of a site. With this caveat, the Home Office provided a list of 1,112 individuals reported to be "overstayers" in CAA, including 680 successful asylum claimants and 133 individuals with rejected asylum claims.¹¹⁹

119 The data provided by the Home Office was accompanied with the following caveat: "The comments are free text and drawn from multiple supplier returns. Terms such as 'successful' and 'positive' both refer to the outcome of an application for Leave to remain/reside, usually but not exclusively asylum. Similarly, for 'negative'

There were 141 overstaying due to a refusal to move out and 146 overstaying due to not receiving their BRP. The data seen by inspectors indicated that service providers were unable to provide reasons for overstaying in 299 of the 1,112 cases reported.

Use of data and management information to monitor operational performance

8.26 Inspectors asked the Home Office for a list of all contingency asylum accommodation that had been in use on 28 November 2023, including details of how long the site had been open, its maximum capacity, and current occupancy. As a reflection of the Home Office's poor data and management information, it had to produce three different versions of this list due to missing properties and associated data.¹²⁰ Poor data has severely

etc although greater caution is required here as some 'negatives' may have an ongoing appeal.”

120 In its factual accuracy response, the Home Office stated that it provided additional data as it was not all fully available in the stipulated timeframe. It also explained that some accommodation was being used flexibly both as dispersal accommodation and as contingency accommodation. The original lists had not referred to dispersal accommodation.

impacted the Home Office’s ability to monitor operational performance. This was acknowledged by the Home Office in its work to develop a draft accommodation strategy, which referred to the “limited ability for providers to oversee properties, due to not having clear data on the properties within their estate. Provider data is also not integrated into Home Office databases.”

8.27 CAA is frequently described by the Home Office as a temporary measure to meet the statutory obligation to accommodate those who would otherwise be destitute in the absence of alternative accommodation.¹²¹ However, the Home Office has been using hotels as CAA continuously since September 2019. Home Office data showed that, as of 28 November 2023, the average length of stay at the 394 contingency hotels for which data

121 Home Office, 'Asylum hotel summary and FAQ' (updated 7 March 2024). <https://www.gov.uk/government/publications/asylum-hotels-exit-summary-information/asylum-hotel-summary-and-faq>

was available was 223.75 days.^{122, 123} See figure 15 for the longest length of stay at 408 sites.¹²⁴

122 The average length of stay data was not provided for seven of the contingency hotels.

123 The average length of stay was calculated by the Home Office using proportions to determine a weighted average of the average length of stay (not the average total length of stay) for the service users accommodated in 394 contingency hotels on 28 November 2023. However, this did not include seven ring fenced hotels, as average length of stay data was not supplied for those sites.

124 Initially, the Home Office did not provide accurate data regarding the length of stay. An additional version of the data was produced, and the Home Office acknowledged that the previous data was “corrupt”. The Home Office stated: “[A service provider] has confirmed that they have now cleansed the source data and corrected the data. We are however unable to guarantee that there are no more errors but have sampled the remaining longest stayers and are satisfied that the data is credible. Confirmation 4751 days which was listed as the longest length was part of the corrupt data.”

Figure 15: Longest length of stay in contingency asylum accommodation (CAA)¹²⁵

Longest length of stay	Number of CAA sites
Over 1,000 days	10
Between 2 years and 1,000 days (731 days and 1,000 days)	83
Between 1 and 2 years (366 days and 730 days)	203
Between 6 months and 1 year (181 days to 365 days)	64
Between 100 and 180 days	27
Between 0 and 99 days	21
TOTAL	408

125 In its factual accuracy return, the Home Office clarified that this data “is taken from live occupancy records and the length of stay figure is a measure of date from first arrival. This includes people who may have entered, departed and re-entered and therefore should not be read as continuous occupation without further checks. The data refers to 415 sites which includes individuals in initial accommodation, not just contingency.”

8.28 One Home Office senior manager commented that not having a prescribed maximum length of stay at large sites previously had been a “mistake”, and another senior manager commented that the Home Office was keen to “limit” service users’ length of stay as much as possible. However, this focus only applied to certain sites: the Bibby Stockholm, Wethersfield, and Napier Barracks. Napier Barracks had a maximum stay of 90 days. This followed legal proceedings. According to factsheets published by the Home Office, the maximum length of stay for service users on board the Bibby Stockholm and at Wethersfield is nine months. This is in line with section 25 of the Nationality, Immigration and Asylum Act 2002, which sets a maximum stay of six months for accommodation centres, which can be extended to up to nine months should circumstances require it.^{126,127,128} On 28 November 2023, the average length of stay on the Bibby Stockholm was 61 days and at Wethersfield it was 70 days.

126 Home Office, 'Promotional material, Portland Port: factsheet' (updated 29 December 2023).

127 Home Office, 'Promotional material, Wethersfield: factsheet' (updated 28 March 2024).

128 Nationality, Immigration and Asylum Act 2002, Section 25: Length of stay (<https://www.legislation.gov.uk/ukpga/2002/41/contents>)

- 8.29** At Napier Barracks, the knowledge that there was a maximum length of stay had a positive impact on service users. They told inspectors they had asked for their friends to be moved from hotels to Napier, because of the maximum length of stay policy and the degree of certainty that it provided. In contrast, service users on the Bibby Stockholm and at Wethersfield were generally not aware about the upper limit that applied to their stay and uncertainty about how long they would be there and what would happen to them next was a major source of stress and affected their mental health and wellbeing.
- 8.30** Inspectors noted that there was no designated maximum length of stay for hotels and other sites. One Home Office senior civil servant told inspectors that new and upcoming sites would continue to accommodate service users until a decision had been made on their asylum claim, rather than their stay at a particular site having a specified end date.
- 8.31** Some sites accommodated specific cohorts of service users, and others had a mixture. Inspectors asked the Home Office for a list of every CAA site, with details of the cohort of service users accommodated there. This information was not readily available to the Home Office and was provided to inspectors in three different versions over several weeks.

Of 415 sites identified, 173 housed single adult males, single adult females, and families at the same site. Only eight sites were designated for families only, and only four sites for single adult females. A breakdown as at 2 February 2024 and at 27 June 2024 is at figure 16. This shows an overall reduction of sites, and in particular the number accommodating single adult males and accommodating single adult males, single adult females and families together, though the latter remains high.

Figure 16: The distribution of cohorts of service users accommodated in CAA sites on 2 February 2024 and 27 June 2024

Cohort	Number of sites at 2 Feb 2024	Number of sites at 27 Jun 2024	Total occupancy at 2 Feb 2024	Total occupancy at 27 Jun 2024
Single adult males	203	85	16,599	9,516
Single adult males, single adult females, and families	173	116	28,399	19,476
Single adult males and families	13	8	1,487	1,213
Single adult females and families	9	18	623	1,366
Families	8	12	292	321
Single adult females and single adult males	5	3	413	325
Single adult females	4	3	44	82
Total	415	245	47,857	32,299

8.32 Inspectors visited one site where cohorts were mixed, with single adult men and single adult women with significant mental health problems required to share bathroom facilities with families with very young children. Due to the lack of monitoring and publishing of this summary level data, a Home Office senior manager responsible for safeguarding was unaware of this situation existing, until told by inspectors.

Conclusion – data and management information

8.33 The Home Office offers accommodation to destitute asylum seekers on a ‘no choice basis’. Service providers are responsible for deciding the allocation of individuals to hotel and hostel-type accommodation, for which there is no formal guidance. For service users in CAA, the Home Office requires the service providers to keep up-to-date records of addresses and any safeguarding concerns. However, it was unclear how the Home Office was ensuring that any individual vulnerabilities were being identified and actioned appropriately, or how it would know if there were issues for particular cohorts at a given site. The Home Office also appeared to have difficulty ensuring that individuals who have received an asylum decision are moved on

within the required 21-/28-day grace period, with appropriate help.

- 8.34** The Home Office decides whether men between the ages of 18 and 65 are “suitable” to be accommodated at former Ministry of Defence sites and on the Bibby Stockholm barge. However, it has had to remove over 200 men from these sites as a result of challenges to the assessment of their suitability, including a small number who were age-assessed as under 18. When it revised the suitability guidance at the beginning of 2024, serious mental health issues – where there is a high risk of suicide, serious self-harm or risk to others – were no longer considered to prevent someone from being assessed as suitable. This seemed counter-intuitive, the more so given the department’s lack of expertise in identifying and responding to vulnerability.
- 8.35** Overall, the data that the Home Office holds and the management information it generates in relation to service users and asylum accommodation (not solely contingency accommodation) is not fit for purpose. It is easy to blame this on the IT, the functionality of which is admittedly an issue. However, more fundamentally the problem is a failure to recognise that effective decision making at every level (strategic, operational, case-specific) relies on maintaining detailed, accurate, up-to-date, retrievable records.

9. Inspection findings: Service user experience

Introduction

9.1 Inspectors explored the experience of ‘service users’ in the different types of asylum accommodation. Inspectors spoke with and received evidence from the Home Office, the accommodation providers and the providers of other services, and stakeholders. Inspectors also spoke with service users themselves wherever possible.¹²⁹

Arrival and induction

9.2 Service users arriving at all contingency asylum accommodation (CAA) sites should receive a standardised induction according to the Statement of Requirements (SoR), including briefings on the accommodation and facilities, and provision of information booklets from Migrant Help and the Home Office in different languages, as well as

129 Both the Home Office and the asylum accommodation providers refer to the individuals and families who are accommodated as ‘service users’. For ease, this report also uses this term.

English. Inspectors saw that this information was available at sites visited.¹³⁰

- 9.3** Sites often had information boards placed in prominent positions near entrances, with information about the accommodation, the local area, and how to access Migrant Help and other organisations.
- 9.4** At all sites visited for this inspection, new arrivals were given a welcome pack which included cleaning materials such as cloths and disinfectant sprays, razors, soap, shampoo and conditioner, toothpaste, and a toothbrush.
- 9.5** At Napier Barracks, run by Clearsprings Ready Homes (CRH), service users were initially brought to a reception room, where they were given Home Office leaflets and material on the conduct expected of them at the site. They were also shown around the site by CRH staff. Inspectors were told that this was also an opportunity for service users with vulnerabilities to be detected, or for them to mention any issues they had not raised up until that point, but there were no records to show how well this was working as an additional safeguarding measure.

130 UK Parliament, Statement of Requirements
<https://data.parliament.uk/DepositedPapers/Files/DEP2018-1112/AASC - Schedule 2 - Statement of Requirements.pdf>

9.6 Inspectors noted displays of art by current and past residents, which presented a cheery and encouraging picture to new arrivals at Napier Barracks (see Annex E).

Engagement with and support for service users

9.7 The SoR sets out a contractual requirement for service providers to signpost service users to a feedback and complaints process. In 2019, the Home Office awarded a contract to Migrant Help to run the Advice, Issue Reporting and Eligibility (AIRE) service, providing a single point of contact for service users within the asylum system. This includes responsibility for capturing, logging, and referring feedback and complaints to the accommodation provider for their resolution, and providing a monthly report to the Home Office on the volume of service user complaints.¹³¹

9.8 Inspectors reviewed the engagement and support provided to service users through onsite visits and heard from stakeholders, accommodation providers, and Home Office staff about its effectiveness.

131 UK Parliament, Statement of Requirements https://data.parliament.uk/DepositedPapers/Files/DEP2018-1112/AIRE_Contract-Schedule_2-SoR_-_HOC_Published.pdf

Accessing Migrant Help services

9.9 Details of how to contact Migrant Help were contained in induction packs and promoted on posters in communal areas in all sites. With the exception of Napier Barracks, Migrant Help did not have a permanent presence at any accommodation site that inspectors visited. Service users could make contact with Migrant Help by phone or email or via an online chat facility. At some locations, service users were signposted to a Migrant Help office in the local city centre where they could speak to someone in person.

Service user feedback

9.10 Service providers seek feedback from service users primarily through quarterly service user experience surveys. These surveys are sent by text and email and are available in ten different languages. Service users can also access surveys by scanning a QR code displayed on posters on walls. However, inspectors were advised by staff that some service users do not own a smart phone and therefore would be unable to provide feedback through this method, unless they borrow someone else's phone.

9.11 The survey produced by the service providers includes questions relating to transport, accommodation cleanliness, access to help,

communications, and staff. The Home Office told inspectors that when the surveys were introduced in 2020 the number of responses was in the hundreds, but by 2023 they received tens of thousands of responses. Responses are reviewed by the Home Office's Customer Insight Team, Migrant Help, and Asylum Accommodation and Support Contract (AASC) providers.

- 9.12** Service providers and sub-contractors told inspectors that service users tended to bypass Migrant Help and instead would try to resolve issues with onsite staff directly. A senior manager in the Home Office rejected the suggestion that this meant that the Home Office would not have a clear understanding of issues, or that it prevented the Home Office from identifying trends, given the volume of calls Migrant Help was receiving each week. However, the consistent message from staff on site at hotels and hostels was that, while they deal with individual issues as they are reported to them, they do not receive the overall results of surveys and lessons learned.

Handling of complaints from service users

- 9.13** Service providers and subcontractors told inspectors that service users were encouraged to bring complaints to the reception or onsite staff in the first instance, rather than contact Migrant Help.

9.14 If a complaint is received by Migrant Help, the relevant accommodation provider is notified. The accommodation provider contacts the manager at the site so that they can investigate the complaint and provide a written response to the complainant. Complaints that can be resolved by the service provider are considered Stage 1 complaints, and the service provider must provide a response within five days. If a service user is not satisfied with the response, it becomes a Stage 2 complaint and is escalated by Migrant Help to the Home Office. When the Home Office receives a Stage 2 complaint, it has 20 days to respond. If a person is still not satisfied with the response, they can escalate their complaint to the Home Office's Independent Examiner of Complaints, who will make a final determination.¹³²

9.15 The Home Office provided data on Stage 2 complaints logged by Migrant Help from service users in all types of asylum accommodation. This showed that, for the 12 months to end December 2023, 7,135 complaints were received. There was an upward trend in complaints received each month from a low of 266 in January 2023 to a high of 861 in November 2023. The Home Office

132 Schedule 13 of the Asylum Accommodation and Support Contract sets out the process for resolution of complaints by service providers (Key Performance Indicator 8).

response to just under half of the 7,135 exceeded the 20-day target. A Home Office senior manager told inspectors:

“most complaints are dealt with by providers directly in the first instance, and a lot of the time the issue has resolved itself, and less than a third get escalated to my complaints team ... A lot of complaints are regarding the Home Office, or relationships with other service users, rather than contractual requirements.”

Information for service users from the Home Office

9.16 Inspectors were told by service provider staff at various sites that complaints usually related to issues with the food and bedrooms. Service users, stakeholders, and staff working in CAA also consistently highlighted that the lack of updates on the status of service users’ asylum claims was a great cause of frustration to service users and detrimental to their wellbeing. This is not a new issue. The Independent Chief Inspector(ICI) drew the Home Office’s attention to it in 2021.¹³³

133 The ICI drew attention to this in a letter to then Director General, Asylum and Protection, dated 21 March 2021 and published its inspection report on contingency accommodation in 2022. ICIBI, ‘An inspection of contingency asylum accommodation, May

Service provider and subcontractor staff told the current inspection team that they felt helpless in supporting service users, as they were not familiar with the asylum process and were therefore unable to alleviate concerns. Nor is it within Migrant Help's AIRE contract to provide updates on an individual's asylum case.

9.17 At Wethersfield, it was apparent that the lack of information on asylum cases had led to tensions between service users and Home Office staff. On a visit to Wethersfield in December 2023, Inspectors observed Home Office staff being surrounded by service users requesting information at lunchtime. Home Office staff said that "they did not feel safe", and as a consequence, in January 2024, their office was moved to a more remote area of the site.

2021 to November 2021'. <https://www.gov.uk/government/publications/an-inspection-of-contingency-asylum-accommodation>. The government's response (para 3.3) stated that asylum interviews by video conference while at Napier ... helped reduce uncertainty. Home Office, '[Response to the ICIBI's "An inspection of contingency asylum accommodation"](#)'.

Residential accommodation

General assessment

9.18 Based purely on visual observations of occupied and unoccupied bedrooms at the sites they visited, inspectors found that most of the accommodation was adequate in terms of being safe, habitable and fit for purpose as required by the SoR.¹³⁴ In general, bedrooms had adequate heating, and inspectors were told by service providers that portable devices were made available if service users wanted additional heating. Additional heating was commonly required in hotels with old or inefficient heating systems, in rooms with high ceilings, or for service users with young families.¹³⁵

134 See Annex E for photographs taken by inspectors. These show that bedrooms at the sites visited were functional and maintained to a decent standard, although the décor and fittings in some showed signs of age and wear.

135 The Statement of Requirements, at Annex B Standards, sets out four distinct levels for the standards of accommodation to be provided. These are Safe (free from an imminent risk to service users health, safety and security, known as Category 1 maintenance issues, such as a gas or water leak or structural instability), Habitable (free from a Category 2 maintenance issue which may have an adverse effect on a Service User's health, safety or security or which have a significant detrimental impact

- 9.19** The facilities in the bedrooms varied by location and by the type of accommodation. Most hotel rooms had en suite toilets and baths or showers. At Napier Barracks and Wethersfield service users were in dormitory-style sleeping quarters, and toilets and washing facilities were provided on a communal basis, which could be in a different building.
- 9.20** In most hotel rooms inspectors visited there was a television with commonly found free-to-air UK channels. At larger sites, televisions were not provided in sleeping areas but were set up in some communal areas.

Room allocation and sharing

- 9.21** In hotel and hostel-type accommodation, rooms are allocated to service users by the service provider, who liaises with their contracted

on the property or the quality of life of the Service User, such as no hot water, gas or electricity supply or exposed electrical wiring), Fit for purpose (free from a Category 3 maintenance issue, such as unsatisfactory lighting and ventilation and defective fixtures and fittings that may pose a hazard to service users). In addition, there are requirements for facilities within bathrooms and kitchens, the provision of which varies by premises type. These accommodation standards are based on the Decent Home Standard in England, and the equivalent standards in Wales and Scotland.

accommodation owners regarding availability. Depending on the configuration and size of rooms, service users may have a room to themselves or may be required to share a room with one or two other people.

- 9.22** Families are allocated a room, or adjacent rooms where possible if they need more than one, to ensure they stay together. Each allocated room would have at least one adult from the family assigned to it to enable parents to maintain supervision of their children.
- 9.23** During their visits to hotels, inspectors did not observe any instances of obvious overcrowding (more people than beds) and service users did not express any specific concerns about room sharing, other than preferring not to have to do so.¹³⁶
- 9.24** Sleeping arrangements for single adult male service users at the larger ex-military sites were usually in shared bedrooms or dormitories. The latter varied in size, but Napier Barracks had up to a dozen men sleeping in each dormitory, with beds separated by wooden partition walls and curtains. One of the main complaints from service users in ex-military sites was the lack of privacy

136 This was based solely on observations by inspectors and did not involve consideration of room sizes against space standards.

and inability to sleep due to noise from other service users.

9.25 Wethersfield had installed modular accommodation with dormitory-style rooms where five or six single adult male service users slept. Though they did not allow for any privacy for service users, the rooms were purpose-built, clean, of a reasonable size, and had adequate power outlets and lighting.

Storage space

9.26 In many of the hotels, storage space and facilities in the individual rooms, such as cupboards, wardrobes, and sets of drawers, were insufficient for the service users' belongings. In some locations, inspectors observed the provision of temporary storage solutions such as metal cages placed under beds.¹³⁷

137 In its factual accuracy response, the Home Office commented: "The storage provided meets the contractual requirements and where it doesn't we would raise this with Providers via the PNC process. The provision of metal cages under beds as a storage solution is allowed in place of a chest of drawers following a Contract Change Notice (CCN) that was agreed with providers for contingency accommodation for single service users only."

Room cleaning

- 9.27** Many of the hotels employed cleaning companies who serviced the bedrooms on a weekly or twice-weekly basis. Other hotels employed their own cleaners. Service users in self-catered accommodation were responsible for the cleaning their own bedroom. Where multiple service users shared bathroom facilities, the contractor would generally arrange for these facilities to be cleaned every week.
- 9.28** At one hostel accommodating families, inspectors observed some concerning practices by service users which had not been addressed. For example, inspectors found that service users had wrapped toilet paper around the toilet seats and had also removed shower heads in order to be able to wash themselves after using the toilet, which was unpleasant and unhygienic for other service users, including children who shared the same facilities. A poster was on display asking for this practice to stop. However, it had continued, and inspectors saw no evidence that provision of a suitable alternative to enable culturally appropriate washing had been considered.
- 9.29** At all of the accommodation sites visited, the communal areas, including stairwells, corridors, dining areas, and recreation facilities, were generally cleaned to a decent standard. However,

this was harder to maintain where surfaces and fittings were old and worn.

Laundry services

- 9.30** Most service users in self-catered accommodation were provided with a washing machine and facilities to dry laundry, and were responsible for laundering their own clothes, bedding, and towels.
- 9.31** Service users who did not have access to a washing machine were provided with a laundry service. At the sites inspectors visited they were told that staff would wash bed linen and towels every week. Personal laundry was typically managed via a drop-off and collect service, at least once per week. This laundry was either done on site by the hotel staff or subcontracted out to another company.
- 9.32** Hotel staff told inspectors that, although the personal laundry service was scheduled and restricted to certain days, they remained flexible, especially for families with small children. Spare, clean bed linen was available if service users needed to change their own beds at short notice between routine changes.

Room access

- 9.33** In hotels, hostels and bedsit accommodation visited by inspectors, all bedrooms had working locks on the doors or were controlled by key card

access, individually issued to the service users. Each service provider had a standard operating procedure (SOP) for how staff should seek to enter service users' rooms. Inspectors were informed by staff working for the service providers that they would generally seek access to a service user's room only by prior notification. Whatever the circumstances for entering a room, service providers and their subcontractors told inspectors that they would always follow the SOP by knocking several times and announcing who they were before entering a room. If there was no answer, and staff needed immediate access, they would open the door very gradually while simultaneously knocking and announcing their arrival to alert anyone in the room to their presence.

- 9.34** Inspectors observed first-hand that this procedure was being used and, when asked, service users did not raise any issues concerning this procedure for entering rooms with inspectors. Inspectors also observed that staff were respectful, supportive, and engaging when dealing with service users.

Routine room checks

- 9.35** Checks were undertaken on a routine basis by the service provider or hotel staff and security staff to ensure that rooms were kept in a reasonable state of order by the service users. Part of this check was to locate and remove, for safety reasons,

any unauthorised items that could be used in the preparation of food, such as microwaves, hotplates, and steamers, along with cooking vessels, including pots and pans. If such items were found, they were confiscated from the service user and stored securely onsite for return to the service user when they moved on from that accommodation.

- 9.36** Another aspect of the room checks was to observe any maintenance defects that would then be logged, and to ensure that any rubbish was not gathering to a degree that it would cause a fire hazard or a health issue. These checks were also undertaken to ensure that there was nothing that would hinder the rooms being cleaned.

Food

- 9.37** The Statement of Requirements (SoR) outlines the food standards for service users accommodated on a full board basis, which include the following:¹³⁸

“a) breakfast;

b) lunch and evening meals, with a choice of at least one hot and one cold selection. At least one vegetarian option shall be provided at each meal;

138 UK Parliament, ‘Asylum Accommodation and Support: Schedule 2, Statement of Requirements’.

- c) a beverage service with each main meal;
- d) a food service for babies and small children with the appropriate foodstuffs. This service shall enable babies and small children to be fed whenever necessary;
- e) options which cater for special dietary, cultural or religious requirements (including, without limitation, gluten free and diabetic options where necessary); and
- f) additional foodstuffs or meals as required to meet the nutritional needs of service users for whom three daily meals may be insufficient.”

9.38 Inspectors were told by staff at sites that these requirements were met, and meals followed NHS Eat Well standards. Some sites also displayed a Food Standards Agency food hygiene rating, with Napier Barracks and the Bibby Stockholm, for example, both having a rating of five (‘very good’). Service provider staff at Napier Barracks told inspectors how they organised meals for cultural events like Christmas and Eid, to foster a positive and relaxed atmosphere in the dining area where service users and staff could mingle and dine together.

Menus and dining facilities

9.39 At most sites, service users were required to eat meals in communal dining areas, with set

mealtimes. Some hotels allowed service users to take food to their rooms, particularly those who catered for families with young children. At the Bibby Stockholm, service users were observed to use plastic containers to take food to their rooms, despite this being prohibited. At two of the hotels visited, service users, including families with young children, had no choice but to eat the meals provided in their rooms as there was no communal dining area.¹³⁹

- 9.40** Four of the 31 accommodation sites visited were self-catered. These provided facilities for service users to prepare and cook their own food. At the other 27 sites, service users were not permitted to cook food in their rooms, which inspectors were told was a common cause of frustration.
- 9.41** At Wethersfield, inspectors observed a rush at the start of meal service in both dining areas, each seating 150 people, and the atmosphere felt tense and potentially unsafe. Home Office managers onsite acknowledged the need to improve the management of groups at mealtimes, as there were frequent altercations between service users. Service users confirmed these tensions

139 B.13 (page 93) of the AASC SoR under 'Dining and Living' states : "The Provider shall use reasonable endeavours to provide separate living/dining areas for use of families."

were a common occurrence, and it left some of them feeling vulnerable. They said that security personnel in the dining areas were unresponsive to their concerns. Home Office staff did not sit in the dining hall with service users during lunch service and told inspectors that if they attended they would be surrounded by service users asking questions about their cases or relocation from Wethersfield.

- 9.42** In contrast, on the Bibby Stockholm barge, inspectors observed a calm atmosphere in the dining room, which accommodated 134 people, with service users and staff interacting and mingling.

Snacks

- 9.43** Service providers are required to supply snacks and additional food to meet the nutritional needs of service users. However, inspectors found disparities in the provision of snacks at different sites, with some having access to fruit, biscuits, crisps, and drinks throughout the day and others limited to certain times. Some hotels also provided access to microwaves and toasters in communal dining areas for service users to use.

Overall quality of food

- 9.44** The food was a common issue raised with inspectors by service users, accommodation

providers, and by third sector organisations. A Home Office senior manager told inspectors that “the common complaints are around food ... If there is evidence that the provider is adhering to the contract requirements in terms of one hot, one cold, and one vegetarian option, there is often not much action we can take. A lot of what we see is driven by people’s lack of tolerance.”

9.45 Service providers reported receiving complaints from service users about the food they were provided with. Contractor staff at one site said: “There is always the odd gripe with the food.” A common issue across all providers was “the level of spice in the food”, with service users saying the food was either too spicy or too bland. Inspectors spoke to service users who shared this concern, and who were unhappy that they often received “fast-food type meals”. Many indicated a preference for cooking their own meals and said they had limited opportunity to give feedback on food provision.

9.46 Service users at Napier Barracks told inspectors that they preferred the food there compared to hotels where they had previously been accommodated. In contrast, service users at Wethersfield complained to inspectors that the food quality was so poor it led to people having “one bite of a meal and throwing the rest away”. One person told inspectors that he was not

receiving the specialised diet he required for his diabetes.

- 9.47** Inspectors found that the quality of food at the sites they visited varied, with better choices and quality available where meals were prepared and cooked onsite, compared to meals that had been pre-cooked at another facility and re-heated in kitchens onsite. In terms of quantity, inspectors considered that portions were adequate for the average adult at all sites visited.
- 9.48** Despite the challenges, efforts were made by accommodation providers, including at large sites, to enhance the food provision. A choice of meals was offered and weekly menus were routinely rotated every four weeks to offer more variety. Some providers had introduced a system where service users could scan a QR code to provide feedback on the food, which was then considered for future meal provision.
- 9.49** The Bibby Stockholm had a food committee, made up of site staff, contractors, and service users, which met monthly to address any food-related concerns. Inspectors observed a committee meeting during their visit and noted that some of the issues raised, including a lack of variety in foods offered and poor quality of chicken, were not effectively resolved at the meeting.

9.50 When inspectors visited the Bibby Stockholm, there was a variety of meal options on offer, including meat, fish, pasta, and a vegetarian choice. However, service users told inspectors that the food provided on that particular day was not representative of their normal daily meals and that fruit was not always available during mealtimes. Inspectors observed a sense of surprise and delight among service users upon seeing oranges and bananas at lunchtime.

Food provision for families with children

9.51 During visits to sites, inspectors saw some evidence of alternative menus being offered for children and families, and baby milk was available where needed. Some hotels used a logbook to document the quantity of baby milk being taken by families, to ensure it was not being misused.

9.52 Third sector organisations raised specific concerns about food provision for pregnant women and families with children in contingency asylum accommodation. A group that supported service users told inspectors it was a regular complaint that the food was not sufficient for pregnant women struggling with nausea, nursing mothers, babies, and young children for whom three meals a day may not be sufficient.

9.53 A report published in March 2024 by a non-governmental organisation (NGO) raised serious

concerns about the appropriateness of food provided for children in asylum accommodation in London. This claimed that children did not have access to sufficient food, or food of an adequate quality, to meet their basic needs, resulting in poor physical and mental health, and malnutrition.¹⁴⁰

9.54 Inspectors concluded that there were legitimate concerns about the food provision for some service users, in particular families with young children and individuals with specific dietary needs. Home Office managers told inspectors that they continued to work with service providers to improve the food offer, but it was clear to inspectors that the standard of food provision was inconsistent across the sites visited.

Safeguarding, health, and wellbeing

Service providers

9.55 Under the Statement of Requirements (SoR), service providers are required “to proactively monitor the service users”, and to notify the Home Office if they believe a service user “may have

140 [People seeking asylum in London face malnutrition, but there is scope for local action | Sustain \(sustainweb.org\)](#)

specific needs or be at risk or is demonstrating indicators of being at risk.”¹⁴¹

- 9.56** The SoR also requires service providers to ensure that staff receive guidance and training in how to identify and manage vulnerable service users with specific needs or who are otherwise at risk.¹⁴² Managers at the accommodation sites that inspectors visited reported that staff based there had completed the mandatory safeguarding training and had Disclosure and Barring Service (DBS) clearance before commencing work.
- 9.57** Hotel staff told inspectors that they were receptive to the welfare needs of the service users. If any safeguarding issues were identified, these were raised with the provider’s safeguarding team, who were available for their staff to contact on a 24-hour basis. On receipt of a referral the provider safeguarding team decides the best course of action, for example, whether it is necessary to escalate to the Home Office and/or a statutory agency, such as the local authority or the police.

141 UK Parliament, Statement of Requirements <https://depositedpapers.parliament.uk/depositedpaper/2280593/files>

142 UK Parliament, Statement of Requirements <https://depositedpapers.parliament.uk/depositedpaper/2280593/files>

- 9.58** Inspectors observed that levels of proactivity by service provider staff in identifying potential welfare needs of service users varied between sites. While all sites signposted service users to speak to staff if they had any welfare concerns, some providers went further and carried out weekly welfare checks with each service user accommodated at their sites. The checks were done in a private area away from other service users to ensure confidentiality.
- 9.59** In general, managers at the inspected sites understood their safeguarding responsibilities and were clear about processes and procedures. They appeared confident that issues were being handled effectively by their safeguarding teams. In hotels, inspectors found operational staff who were alive to safeguarding issues and understood their responsibilities to report any such issues affecting service users in their care.
- 9.60** At the time of this inspection, the Asylum Support, Resettlement and Accommodation (ASRA) directorate had recently appointed a dedicated staff member to review safeguarding standards. Inspectors were told that the purpose of the role was to introduce a quality assurance framework for the service providers which would provide “meaningful data and be able to comment on

safeguarding issues wholesale, rather than individual cases”¹⁴³

9.61 In general, operational staff appeared respectful of and committed to doing their best for service users and, at most sites, service users were keen to express to inspectors their gratitude for the staff

143 The Independent Chief Inspector of Borders and Immigration (ICIBI) inspection of contingency asylum accommodation for families with children in Northern Ireland (May – June 2023), submitted to the Home Secretary on 8 August 2023 and published on 29 February 2024, included a recommendation for the Home Office to strengthen assurance and monitoring arrangements. This was to ensure accommodation providers, and their contractors and sub-contractors, are meeting all the standards set out in the Asylum Support Contracts Safeguarding Framework (which all AASC providers and Migrant Help signed up to in May 2022). ICIBI, ‘An inspection of contingency asylum accommodation’, p. 8. This recommendation was accepted by the Home Office, and in its response, it stated that “it is in the process of developing a framework to enhance quality assurance of the AASC provider’s safeguarding responses”. It also stated that it will “ensure that assurance and monitoring arrangements are clarified as part of statutory obligations of agencies, contractors and sub-contractors”. Home Office, 29 February 2024, Response to recommendation 4, Response to the ICIBI’s “An inspection of contingency asylum accommodation”.

working at the site. However, inspectors also heard about poor practices. In one case, inspectors were told that welfare staff made themselves unavailable when their supervisor was not onsite, locking their room and telling service users to “go away”. At another site, a welfare officer informed inspectors that a colleague had blocked local voluntary groups that they did not like from offering support to service users.¹⁴⁴

Home Office Asylum Safeguarding Hub

9.62 The Home Office has a Safeguarding Hub located within the ASRA directorate. The hub acts primarily as an interface between asylum seekers and statutory agencies. The Home Office’s Safeguarding Briefing Pack describes the role of the hub as to “advocate for an individual’s needs with the statutory agencies to promote appropriate safeguarding interventions, with the relevant statutory agencies retaining responsibility for all decisions on intervention activity”.

9.63 In addition, the hub is involved in working groups with partners, including local authorities, other government departments, and the third sector, in which it explores thematic issues in respect of safeguarding, mental health, and data sharing. The Home Office has also established a safeguarding

144 These instances were shared with the Home Office at the end of onsite feedback on 30 January 2024.

forum with local authority partners, designed to “facilitate a national dialogue to establish a shared understanding of vulnerability and related duties”.

Healthcare provision

- 9.64** Healthcare provision for service users differed depending on the accommodation type and location. Weathersfield and Bibby Stockholm had staffed, well-equipped medical centres onsite, with service users able to see a medical professional within a day or two. At Napier Barracks, there was a nurse practitioner onsite four days a week.
- 9.65** Service users in most hotels did not have access to any healthcare professionals onsite and were typically registered with a local GP. Welfare Officers assisted service users to make appointments with the local GP surgery, as necessary. Several hostels and hotels in South London benefited from having a Health Initiatives Team with health professionals on site, as part of a project funded by an NHS hospital trust, which acted as a referral mechanism to local health and social care services.
- 9.66** Staff at hotels visited by inspectors said that they were confident that all service users were registered with a GP within 14 days of arrival at the site, in accordance with the service standard. However, inspectors attended a multi-agency meeting in Scotland and were told that some

service users in hotels there were waiting longer than 14 days to register with a GP.

Mental health

9.67 A Home Office senior manager acknowledged that “accommodation choices and accommodation strategies have an impact on the overall well-being of service users”. Inspectors spoke to a member of the Home Office’s Safeguarding Strategic Mental Health Team, who identified the challenges to the mental health of service users at both large sites and in hotels:

“I recognise that large sites have their own challenges; there are risks around bullying, harassment, and intimidation. However, at hotels, there may be no socialisation and service users are sat about staring at walls. It is about identifying risks and helping service users develop coping skills. We need to encourage service users to make the best of the situation they are in and take advantage of the opportunities available in that environment. Living in the community is not a good thing for some people – a contained site may be better for them.”

9.68 This was at odds with what stakeholders, service providers, and service users told inspectors. The remote location of Wethersfield and of the Bibby Stockholm barge was viewed as preventing

service users from leading a normal life and having a detrimental impact on their mental health. Service users felt that the nature of these facilities, set apart from the local community and having highly visible security features and procedures, constrained their liberty and gave the impression that they were in “quasi- detention” accommodation.

- 9.69** One stakeholder who had carried out interviews with residents at Wethersfield reported that they likened the accommodation to a prison: “[They] regularly say the heavy surveillance, including the presence of CCTV and security guards, and being surrounded by chain link fence and barbed wire makes them feel like they are imprisoned. This leads to stress and low mood.” The site was considered by stakeholders and service users to have “a profound and negative impact on service users’ health, wellbeing and dignity”.
- 9.70** Inspectors were provided with a list of outstanding judicial reviews relating to Wethersfield and Bibby Stockholm, many of which involved service users claiming that the sites were not suitable accommodation for them. One service user on the barge claimed to have been “a victim of serious physical violence [prior to being accommodated on the barge], and suffering from depression, serious mental distress and trauma symptoms”. He said his mental health had “deteriorated so significantly

that he had active suicidal ideation and had attempted suicide”.

- 9.71** At Wethersfield, an international humanitarian organisation had set up a mobile clinic, run by volunteer GPs, nurses, and caseworkers, three days a week from December 2023.¹⁴⁵ GP consultations, with an interpreter, were available for service users at the clinic and a summary of the consultation was sent to the onsite health provider outlining any further or follow-up care requirements. Clinicians from the clinic reported that residents at the site had unmet health needs, and that “this is most apparent in the case of mental health needs.”
- 9.72** A representative of a stakeholder organisation working with victims of torture described inconsistent safeguarding provision by accommodation providers’ safeguarding teams. They said that at some sites service users were “being exposed to anti-social behaviour, risk of harm, suicidal ideation [from other service users], and a lack of access to healthcare, including a failure to register with a GP, with consequential impact on access to medication and treatment necessary to manage serious conditions”. Another stakeholder highlighted that “a fear of violence is

145 Doctors of the World (DOTW) in partnership with Médecins Sans Frontières (MSF).

inevitably heightened in any environment where large numbers of people are resident, against their will, in a quasi- detention [ex Ministry of Defence] environment”.

9.73 In June 2024, inspectors asked the Home Office for data on the number of safeguarding incidents in which room sharing was recorded as a potential factor, and the number of these incidents involving suicide or self-harm, from 1 January to 1 June 2024. The Home Office provided data for the last week of June 2023 to May 2024, from the Asylum Safeguarding Hub, which showed that a total of 1,060 cases were referred where there were concerns around room sharing. Of these, 336 referred to suicide or self-harm. The data showed a steady increase and then decline from 49 cases in June 2023, up to a high of 207 in November 2023, and then down to 33 by May 2024.¹⁴⁶

9.74 In 2023, the Home Office commissioned a review of the support for asylum seekers’ mental

146 The Home Office provided this data with the following caveat: “Please note all figures are reported/ recorded via internal managed information (MI) as this information will be taken from a live operational database and are therefore provisional, subject to change and are not assured to the standard of official statistics, as it is internal MI.”

health and wellbeing in initial accommodation.¹⁴⁷ The review recommended initiatives to improve sleep hygiene, volunteering opportunities, better information and timescales for how long individuals will be in the accommodation, and direct mental health support, drawing on best practice across the asylum estate. However, by early 2024, the Home Office had yet to implement a plan to address the suggested improvements in a consistent manner across the asylum accommodation estate.¹⁴⁸

147 The Resettlement, Asylum Support and Integration Directorate commissioned the Home Office's Policy and Innovation Lab to design ways to best support asylum seeker mental health and wellbeing in initial accommodation. The review involved desk research, ethnography across four initial accommodation sites, interviews with 83 residents, accommodation staff and support organisations, and Home Office staff. It took place between August 2022 and January 2023 when it reported.

148 In June 2024, the Home Office provided an update on implementation of the recommendations from this report. This highlighted four recommendations that had been taken forward by some accommodation sites, including volunteering opportunities for residents, creation of opportunities for residents to cook informally in on-or off-site kitchens, supply of bikes for residents, and encouraging staff to upskill themselves in languages

Cohort-specific needs

- 9.75** Staff guidance on allocating asylum accommodation focuses on the suitability of an individual to be accommodated at former Ministry of Defence (MoD) sites, vessels, or Napier Barracks, and on their suitability for room sharing. This does not include guidance on how specific cohorts should be accommodated, such as segregation based on sex or vulnerability. It states: “In general, all types of asylum accommodation are suitable for most individuals receiving asylum support, except those with the most serious physical and mental health needs.”¹⁴⁹
- 9.76** Inspectors visited a hotel that housed only single women. Staff told inspectors that the women there were “mostly victims of modern slavery and human trafficking”. Staff at the hotel informed inspectors that one service user was bringing

spoken by residents. The update also highlighted six recommendations that now feature in contractual requirements at large sites, including on site welfare team available seven days per week including at least one welfare officer on site, enabled smart phones with active sim cards, enabling each service user to have reasonable access to a phone for essential purposes where they do not have a phone of their own.

149 Home Office, ‘Allocation of asylum accomadotion policy’.

different men back at different times, including at night, via a side fire door. Steps had been taken to address this issue by replacing a female security guard with “a stricter male guard” and by putting an alarm on the side fire door. When told about the practices at the hotel by inspectors, a senior manager explained that asylum accommodation was not a refuge or a place of detention, and as such “it is the service users’ choice who they invite into their home”.

9.77 Inspectors visited eight hotels that accommodated families and found examples of where the particular needs of families were not adequately catered for. At more than one hotel, there were no child-friendly activities or spaces for children to play. Furthermore, single adult males were housed in the same hotel and, although attempts had been made to separate the different cohorts by floor, some single men were sharing communal bathroom facilities with families with children. Inspectors raised this with a Home Office senior manager. They said that they saw no issues arising from this situation but undertook to look into it. Inspectors requested an update on 1 June 2024 on the issue of different cohorts sharing accommodation and facilities, but no response was provided.

Activities, leisure, and recreation

- 9.78** During their visits, inspectors asked about how service users spent their time and what activities were available to them, both at their accommodation and in the wider community.
- 9.79** This was particularly relevant when considering the length of time some service users were spending at the accommodation. Inspectors found that the quality and availability of enrichment activities, leisure opportunities, and recreation facilities varied significantly from site to site.¹⁵⁰ The lack of meaningful activities had a greater impact on the mental and physical health of those service users whose accommodation was remote (at sites not close to a town centre or local amenities), or sites where access and the freedom to come and go were restricted (such as at Wethersfield and the Bibby Stockholm).
- 9.80** Service users residing in CAA are typically restricted from working in the UK unless they have not received an asylum decision within at least 12 months from the date of submitting their claim. If successful in applying to have the restriction lifted, they can work only in jobs that are on the shortage

150 Enrichment activities is a term used by the Home Office to describe additional activities, including, for example, outings, clubs and lessons.

occupation list.^{151,152} Service users can access education for free only after six months from submitting their asylum claim. If they wish to study before this, they must pay the course fees or find alternative funding.¹⁵³

9.81 Individuals who cannot access work or education need meaningful activities to prevent boredom and promote wellbeing. Research into the impact and effectiveness of meaningful activity for people with mental health problems, conducted by academics in the Camden and Islington NHS Foundation Trust and published in 2017, noted that “the vast majority of the 33 studies reviewed found people

151 Migration Advisory Committee, 'Shortage occupation lists'. <https://www.gov.uk/government/collections/migration-advisory-committee-recommended-shortage-lists>

152 UK Visas and Immigration, 'Permission to work and volunteering for asylum seekers' (published 8 September 2010). <https://www.gov.uk/government/publications/handling-applications-for-permission-to-take-employment-instruction>

153 Refugee Education UK, 'I am an asylum seeker: what are my options for higher education?'. [Refugee Education UK | Help for College | Asylum Seeker Further Education](#)

experience positive outcomes from participating in meaningful activity or occupation”.¹⁵⁴

9.82 The need to provide service users with meaningful activities was not lost on the Home Office. A Home Office senior civil servant (SCS), who had worked previously within the prison system, recognised the importance of preventing boredom amongst service users and told inspectors that “the number one priority with prisons is to make sure the detainees are meaningfully occupied”. Another SCS also recognised the need to provide service users with meaningful activities for wellbeing and safety reasons.

Overview of the activities provided

9.83 During site visits, service providers told inspectors that local arrangements were in place to provide a range of recreational activities and leisure facilities. These were provided by a mixture of local charities, local authorities, and the accommodation providers themselves.

154 National Development Team for Inclusion, 'Introduction to the research on: the impact and effectiveness of meaningful activity for people with mental health problems', (published 30 May 2017), p. 5. https://www.ndti.org.uk/assets/files/MH_research_on_meaningful_activity.pdf

- 9.84** The SoR does not specify that activities should be provided at CAA sites. It does include a general requirement for the service provider to consult and liaise with the local authority to ensure the accommodation does not adversely affect local authority developments and plans. Good practice between service providers, local authorities, charities and NGOs has evolved to encourage asylum seekers to join activities at sites or in local areas. During site visits, service providers told inspectors that local arrangements were in place to provide a range of recreational and leisure activities.¹⁵⁵
- 9.85** A range of activities were available across the 31 sites visited by inspectors. Some, such as English classes provided by staff, were widely available, although many others, such as cycling/running clubs and photography workshops, were available at only one or two sites.
- 9.86** Service providers told inspectors that in some locations their relationship with charitable organisations and local authorities enabled them to source meaningful opportunities for activity and leisure. Inspectors met some passionate and dedicated welfare staff, employed by service providers, who identified and arranged activities.

155 UK Parliament, 'Asylum Accommodation and Support: Schedule 2, Statement of Requirements'.

At one location in Scotland, a welfare officer identified multiple community-run activities that service users could access, including a variety of mental health and counselling opportunities.

- 9.87** ‘Friends of Napier’, a group of 16 volunteers operating from an NGO hub at the Napier Barracks site, provided various forms of support to service users. For example, the hub encourages service users to come together within its space and make use of their skills, such as hairdressing and repairing damaged clothing. They also promoted a ‘give back to the community’ programme through which service users offered free haircuts to homeless people and donated food grown on site to local shelters, all of which created a positive image of the site and service users for the local community.
- 9.88** Inspectors found that the welfare officers at the Bibby Stockholm were instrumental in identifying new and interesting activities to keep the service users engaged. Staff told inspectors that they had arranged team-building exercises, maths classes, and local walks, among other activities. A Home Office manager told inspectors that the provision of activities on-and offsite at the Bibby Stockholm was a result of the Home Office agreeing to provide additional funding for local authorities impacted by large sites. Stakeholders involved with the Bibby Stockholm confirmed that, as a result

of funding, they had “been able to provide some really great projects and initiatives”. Similar funding had also been agreed for the Wethersfield site, but a Home Office senior manager explained it had “taken time to trickle through”.

- 9.89** At all inspected accommodation sites, service users were given the opportunity to take part in English language lessons. The lessons were provided either at the accommodation, often by service provider staff, or at a local church or college by an external organisation. Service providers and contractors reported that the sessions were always well attended. At one location, service users reported that they continued to practise their English with staff outside of the classes and completed crosswords or homework set by the course providers. In Wales, the University of Cardiff ran lessons and provided service users eligible to access education with transport to classes.
- 9.90** Welfare staff employed by service providers or subcontractors told inspectors that local authorities generally provided children in contingency asylum accommodation with a school place within a reasonable period of time, generally within a week or so.
- 9.91** Inspectors visited a hotel in the Birmingham area that provided a particularly wide range of activities onsite for the service users, including a library,

dart board, air hockey table, pool table, table tennis, video games, television, and a selection of DVDs. In addition, the service users had access to art and photography classes provided offsite (see Annex E). This was at the initiative of the owners of the hotel (rather than the service provider), who sought to minimise boredom for service users.

9.92 At one of the hotels, a former Premier Inn site, there was no communal space for service users to socialise or undertake activities, despite the site housing families with children. Another site, which housed single adult males alongside families with children, locked their communal rooms, unlocking them on request. Lack of access to communal spaces was concerning, particularly where there were families with children, making it difficult for them to take meals as a family or have space for children to play.

9.93 At the time of the inspection, there was no-one in the Home Office with overall responsibility for ensuring that service users were provided with meaningful activities, nor did each of the accommodation providers have someone charged specifically with this task.¹⁵⁶ The

156 In January 2024, an SCS told inspectors that a new role within the ASRA directorate had just been created to look at the meaningful activities for occupants at large sites.

extent and quality of provision often relied on local initiative by welfare staff, but information about successful ideas and activities that had been set up was not being shared. As a result, provision was inconsistent across the contingency accommodation estate. Inspectors concluded that the Home Office and its contractors needed to work more closely together to identify what was required, and to engage with local authorities and others to improve the delivery of meaningful activities at each site.

Activities at Wethersfield

- 9.94** The Wethersfield site is in a remote location with no access to public transport. The site runs a daily minibus service for service users that offers transport to and from the neighbouring towns of Braintree, Chelmsford, and Colchester, at set times of the day. Service users told inspectors that they did not use the minibuses much, as they had nothing to do when they arrived in the neighbouring towns.
- 9.95** Inspectors visited Wethersfield on 19 December 2023. On 20 December, the Independent Chief Inspector wrote to the Home Secretary to express his concerns about the lack of purposeful activities, which were contributing to heightened tensions and potential deterioration in mental health (see Annex F). The Immigration Minister

replied on behalf of the Home Secretary in a letter dated 10 January 2024. The minister recognised “the need for additional enrichment on site to complement the existing services and is working closely with Braintree District Council and the voluntary and community sector to augment the provision of services”.

- 9.96** Due to the lack of provision of purposeful activities on site and the remoteness of the location, service users spent most of their time in their rooms. Although the site has a gymnasium, which is well equipped, and a large indoor sports hall where service users can play basketball and cricket, neither facility was being used by more than a handful of service users when inspectors visited. There was a lack of information to encourage use of these facilities or to promote organised sporting activities.
- 9.97** Service users at the site told inspectors that they were bored and had nothing to do; one told inspectors: “I ran away from a bad place, and I’ve come to a worse place.” The Home Office and the service provider both recognised that the lack of recreational activities was having a negative effect on the service users’ wellbeing.
- 9.98** A Home Office senior manager with responsibility for the Wethersfield site told inspectors: “It took a long time to get funding to the local authority there, and the local authority is being slow about actually

turning that funding into activities. As such, there is a lack of any real recreational or educational activities at Wethersfield, with consequent effects upon the wellbeing of service users.”

9.99 On 8 February 2024, inspectors returned to Wethersfield to see if any progress had been made in the provision of activities since 19 December 2023. A senior Home Office manager was asked to describe the progress and told inspectors that “nothing as yet” had been delivered but said that funding had now been agreed with the local authority and planning was well developed. On 9 February 2024, the Independent Chief Inspector wrote to the Immigration Minister to reflect his concerns at the continued lack of enrichment activities (See Annex G). The Immigration Minister responded in a letter dated 16 February 2024, advising that the accommodation provider had added “further physical and enrichment activities to the programme, including cross-fit, body pump, boxercise and chess. Progress is being made to support activities offered by voluntary organisation, such as maths classes, English for speakers of other languages (ESOL) lessons, and cricket.”

9.100 Inspectors were given conflicting information about why activities had not yet been introduced. The Home Office explained that funding was late to arrive with the local authority and that welfare

officers needed to do more in terms of activities, but they had been consumed by responding to a high volume of legal challenges.

- 9.101** An SCS told inspectors that lessons learned at other sites had not been adopted at Wethersfield, explaining that “this was due to the speed at which the previous minister and Home Secretary wanted sites delivered. There was no time for staff to address issues such as activities onsite.” The SCS acknowledged the lack of progress with visible enrichment activities but explained that plans were in place to start delivery of activities in the near future, saying: “We have had meeting after meeting with Braintree District Council but in the next month or so this will deliver activities.”
- 9.102** In an update provided on 27 June 2024 the Home Office stated it was “liaising with Braintree District Council and local voluntary sector organisations to deliver a programme of community activities, including English language classes, recreational activities and volunteer opportunities”. The Home Office provided an undated timetable of a wide variety of regular activities, although the status of some remained pending from April 2024.

Religious observance

- 9.103** The SoR requires service providers to signpost service users to local religious and cultural

facilities.¹⁵⁷ Inspectors were told that service users were informed about nearby places of worship during the induction process, and all the sites visited by inspectors had details of churches and mosques in the local area in induction packs and displayed on posters on walls.

9.104 The majority of hotels had no specific provision for religious observance onsite. Staff at these hotels explained that service users made use of nearby places of worship according to their faith or prayed in their rooms. One hotel in Scotland had provided a room to an imam who had set up a mosque for service users. Inspectors were told that the response from service users was excellent, and many residents utilised the facility.

9.105 The Bibby Stockholm had one multi-faith room onboard, which was available to service users for religious observance. Due to disputes arising from the worship requirements of different faiths, a chaplain was currently using a conference room to lead Christian worship, and the service provider planned to redesignate this as a second multi-faith room.

157 UK Parliament, 'Asylum Accommodation and Support: Schedule 2, Statement of Requirements'.

Conclusion – service user experience

9.106 The type (in terms of such things as room size and whether it was shared with others, decoration, amenities, location etc.) of accommodation provided to service users varied considerably across the sites visited by inspectors, resulting in very different service user experiences. Overall, a decent standard of cleanliness was maintained at each of the sites inspectors visited, but this was easier to maintain where the accommodation was newly built or recently refurbished, as were parts of Wethersfield and the Bibby Stockholm, and harder where buildings were old and well-worn, as at Napier and some hotels.

9.107 The reception and induction process for service users was broadly the same at each type of site. Service users were provided with information about the local area and services on arrival, but they were critical about a lack of engagement from the Home Office thereafter, in particular in relation to the progress of their asylum case. Uncertainty about how long they were going to have to stay at a particular location and what was happening with their asylum claim was a primary cause of stress and anxiety for service users, especially those at Wethersfield and the Bibby Stockholm. It was noticeable how different the mood was there compared with Napier, where the service users

knew that they would be moved on to dispersal accommodation within 60 to 90 days.

- 9.108** The quality and variety of the food offered was the most common issue highlighted by service users. At the sites inspectors visited, provision was made for special dietary, cultural, or religious requirements; portion sizes were adequate, and snacks were available outside set mealtimes. However, stakeholders have raised concerns about food provision for pregnant women and families. As much as service users' complaints were about the food itself, this was an example of them feeling controlled and having no sense of agency, other than not to eat the food provided. At most sites, there was no opportunity for them to cook for themselves.
- 9.109** Sleeping accommodation and access to washing and toilet facilities varied considerably, from hotel rooms with ensuite facilities to dormitory-style rooms and communal facilities provided in a separate building. Those sharing rooms and sleeping areas with people they did not know, and those placed in large sites in remote locations with few purposeful activities, such as Wethersfield, were the least content with their accommodation.
- 9.110** This was affecting the mental health of some of the service users. More generally, it was impacting adversely on the mood of service users and had the potential to cause unrest and conflict between

service users and staff and among the service users themselves. By the time the first service users arrived at Wethersfield, the Home Office had experience of operating sites accommodating large numbers of service users, including Napier Barracks. Notwithstanding the speed with which it was required to move, it should have been able to make better use of this experience and the lessons learned, and stepped in sooner and taken the lead in ensuring service users were provided with enough meaningful activities to avoid the situation inspectors found when they visited.

9.111 Access to healthcare was also inconsistent, with larger sites having a dedicated health centre and onsite medical staff, while some large hotels that were accommodating similar numbers were reliant on existing local NHS services. With regard to mental health, about which some stakeholders were particularly concerned, the Home Office had commissioned research into how best to support asylum seekers' mental health and wellbeing in asylum accommodation. This reported in mid-2023, but as at the beginning of 2024 it did not have an agreed strategy for mental health support and purposeful activity.

10. Inspection findings: General security, and health and safety

Introduction

10.1 Inspectors examined the general conditions and environment of the contingency asylum accommodation sites visited, including security, health and safety, and maintenance.

Safety and security

10.2 Although the accommodation service providers manage the operational delivery of the Asylum Accommodation and Support Contract (AASC), they each subcontract the security element of the services to specialist private security providers.

10.3 Under the Statement of Requirements (SoR), service providers are responsible for taking appropriate action to assure the “security, safety, and wellbeing of service users”, and they are required to co-operate with Home Office staff who may act as “a source of advice and guidance”.¹⁵⁸ While the service providers have this responsibility under the contract, the Home Office is ultimately

158 UK Parliament, ‘Asylum Accommodation and Support: Schedule 2, Statement of Requirements’.

accountable for the security of sites and the safety of ‘service users’.

- 10.4** All the sites visited by inspectors had dedicated 24-hour security provided through sub-contractors. The number of security officers deployed varied. Security officers were Security Industry Authority (SIA) accredited, which is a legal requirement for anyone undertaking a private security role within the UK.¹⁵⁹
- 10.5** Security officers were responsible for ensuring that the entry points to the premises were secure and that only service users, staff, contractors, or other authorised visitors were allowed access. They were considered the first line of defence against any unauthorised persons accessing the site, including protesters.

159 The Security Industry Authority (SIA) is the public body that regulates the private security industry in the United Kingdom. The Private Security Industry Act 2001 (“the Act”) established the SIA and sets out how regulation of the private security industry works. Section 3 of the Act makes it a criminal offence for individuals to engage in licensable conduct unless they have a licence. The SIA is responsible for granting, renewing and revoking these licences. See: <https://assets.publishing.service.gov.uk/media/62e257e3e90e071434354438/sia-get-licensed.pdf>

- 10.6** Uniformed security officers provided a clearly visible presence at the entrances to all sites visited as part of this inspection. Officers received inspectors politely and generally required them to show identification and to record their entry and exit in a log. However, at two of the 31 sites visited an inspector was allowed entry without being asked to produce identification, although they were accompanied by other inspectors who were asked, and the names of all inspectors had been provided in advance.
- 10.7** Welfare officers (WO) and hotel staff told inspectors that the security staff were helpful and went above and beyond what was expected of them to support service users. One WO described how the security officers assisted the service users with translation and helped them to communicate with staff. However, at some sites, including Wethersfield, service users reported that security staff were not sufficiently responsive to their concerns about the behaviour of other service users.
- 10.8** Security officers at large sites were regularly positioned in the dining areas at mealtimes, as this was seen as a potential location for conflict. Other duties performed by the security staff included conducting general patrols of the premises and its external perimeter, and accompanying cleaning staff while they were performing their duties.

Disorder and violence

- 10.9** Inspectors were told of several incidents of violence, criminal damage, and aggressive behaviour involving service users, which required the intervention of security and/or the local police. Some service users told inspectors they chose to remain in their rooms outside of mealtimes due to concerns for their safety.
- 10.10** In an update provided to inspectors on 27 June 2024, the Home Office presented an overview of violence and disorder incidents reported over the previous six months. During this period, a total of 2,106 incidents were reported. These incidents were categorised as follows: 667 incidents of smoking; 453 incidents of disputes between service users; 395 incidents of violent or abusive behaviour; 385 incidents of property damage; 108 incidents of drunk and disorderly conduct; and 98 incidents of drug abuse. Due to the Home Office's record-keeping methods, it was unable to provide inspectors with detailed information about the outcomes without manually reviewing each case.
- 10.11** Police and security officers at Wethersfield told inspectors about a number of incidents that had occurred at the site, including:
- one service user smashing a mug over the head of another service user, resulting in a cut which required medical attention

- service users damaging the transport buses, using pool balls to smash windows
- police being called to attend the site multiple times due to crowd disturbances and unrest by service users
- a service user reporting that they were racially abused by a site manager, although this was later assessed to be a malicious complaint¹⁶⁰

10.12 An officer from the local district council that covers Wethersfield informed inspectors about challenges and issues that are placing a large strain on local services. They highlighted that there had been continued tensions arising from anti-social behaviour by service users, including littering, drinking, causing criminal damage, and urinating in public places. This anti-social behaviour had increased the burden on the local authority in terms of complaint handling, management of public relations, and deploying of teams to clear up discarded rubbish.

160 There is an incident log at Wethersfield, and incidents are escalated to the accommodation service provider. Inspectors were not informed of the outcome of these incidents, except for the assault with the mug where they were told that the service user was charged with actual bodily harm and the victim was moved to a different site.

- 10.13** In terms of police involvement, inspectors were told that two officers from Essex Police were onsite at Wethersfield several days a week and that their main role was to manage the impact on the local community. Local residents had been provided with a contact number for them to call should they have any concerns.
- 10.14** A senior police officer involved in the policing response at the Bibby Stockholm told inspectors that Home Office senior managers engage with the police through forums and that a community impact assessment is completed regularly and in collaboration with local partners.¹⁶¹ In addition, neighbourhood policing officers visit the site weekly.
- 10.15** One senior police officer told inspectors: “We have a more relaxed approach to hotels with little engagement from the police required.” However, information provided by the Home Office indicated that police had made arrests and issued cautions

161 Community impact assessment: An assessment that is used by a police force to identify how an issue or incident has affected, or will affect, a community. It helps forces to learn lessons for the future and develop long-term plans to (re)build community confidence.

to service users at various hotels around the UK, mostly in relation to violent behaviour.¹⁶²

10.16 A welfare staff member located at a site in the North of England told inspectors that a service user had threatened to kill them and had also physically and sexually assaulted a member of the cleaning staff. The incident occurred within a premises accommodating 50 single adult males that had three full-time security officers on site at any given time. Police were notified about the alleged assault, and the man was arrested. The WO told inspectors that additional security and an increased management presence were introduced. It was clear to inspectors that the welfare staff remained concerned about their personal safety at the premises, and a security officer was permanently placed outside the welfare offices. When this security officer performed their hourly patrol of the building the welfare staff locked themselves in their office until the security officer returned. One welfare staff member told inspectors: “We don’t go anywhere without a security guard and wear a panic alarm around our neck.”

162 This information was contained in a local spreadsheet that did not purport to be a complete and audited record of all incidents. Inspectors did not examine each entry.

Demonstrations and protests

- 10.17** Around a third of the 31 locations visited by inspectors had been subject to some form of public demonstration. The demonstrations varied from lone individuals attending at the premises and filming, to larger, more organised demonstrations involving members of the local community, charities, and far-right protest groups.
- 10.18** One security officer at a hotel told inspectors that he had witnessed two protests from a high-profile far-right group. A large number of protesters came to the hotel and were aggressive with security officers and tried to start fights with the service users. The police were called on both occasions and dispersed the protesters. Other forms of protest included local residents and charities objecting to the development of the sites at Wethersfield, RAF Scampton, and the Bibby Stockholm at Portland Port.

Numbers of security staff

- 10.19** The number of security personnel at each site varied. One hotel site in the Northeast of England housing 274 single adult male asylum seekers had three security officers on duty at any one time. Wethersfield, with 544 residents (as at 16 June 2024), had a security presence of 45 officers during the daytime. Inspectors were told that the much larger security presence at Wethersfield

was required to manage additional facilities at the location, such as the medical centre, and to undertake patrols across the large geographical area of the site. Inspectors were also told that security had been increased at the site following incidents of disorder in December 2023.

Ease of movement of service users

10.20 Although service users are generally free to come and go as they please from their accommodation, they are required, along with visitors and contractors, to sign in and out of the premises.¹⁶³ Under the SoR, service providers are required “to operate a daily register to keep track of service users”. Security staff and service providers told inspectors that most service users complied with the signing in and out process. However, they said that the register was not always completed at all sites.

10.21 A manager employed by the service provider at Wethersfield told inspectors that they were “not confident there was an accurate register of who was onsite at any one time” and that this was “something that needed to get better”. A different service provider at a house in multiple occupation,

163 Some restrictions were in place at Wethersfield and the Bibby Stockholm regarding the earliest time a service user could leave the site and the latest time they could return.

accommodating 50 single males, told inspectors: “the register is checked a couple of times a day, but not everyone is compliant, and some cannot read and write”

10.22 A member of welfare staff told inspectors that the logs were required to manage health and safety in the event of a fire at the premises. The log also helped to prevent unauthorised persons gaining access to the site and assisted staff to identify absconders.^{164,165}

164 ‘Missing’ migrants was not in scope for this inspection. The Home Office does not consider service users who leave contingency asylum accommodation of their own accord as absconders or “missing” as they are not detained. Inspectors had asked for the number who had “gone missing” between 1 January and 1 June 2024. The Home Office responded: “The asylum support system and its accommodation provider does not track the location or compliance of individual after they leave support. Individuals are free to leave Home Office accommodation and support themselves at any time. Other parts of the Home Office and Immigration system are responsible for determining whether a person has remained in contact with the Home Office as per their bail conditions or whether a lack of contact warrants withdrawal of a claim and/or absconder action to be taken by Immigration Enforcement.”

165 In June, on a visit to Wethersfield, inspectors were told by the site manager that there had been 149

Community engagement

10.23 The Home Office has produced “promotional material” in the form of ‘factsheets’ relating to the larger sites used to accommodate asylum seekers and these are available to the general public through the GOV.UK website. Factsheets are available for Wethersfield, RAF Scampton, Portland Port (Bibby Stockholm) and Manchester Road – Huddersfield.^{166,167, 168,169} The factsheets

absentees (individuals who had left without notifying of a new location) since it opened.

166 Home Office, 'Wethersfield: factsheet' (updated 20 August 2024). <https://www.gov.uk/government/publications/asylum-accommodation-wethersfield/wethersfield-factsheet#why-we-need-large-sites>

167 Home Office, 'Scampton: factsheet' (updated 10 September 2024). <https://www.gov.uk/government/publications/asylum-accommodation-scampton/scampton-factsheet>

168 Home Office, 'Portland Port: factsheet' (updated 9 August 2024). <https://www.gov.uk/government/publications/asylum-accommodation-portland-port/portland-port-factsheet>

169 Home Office, 'Manchester Road, Huddersfield: factsheet' (updated 22 May 2024). <https://www.gov.uk/government/publications/asylum-accommodation-manchester-road-huddersfield/manchester-road-huddersfield-factsheet>

address topics of interest, including security, which are likely to concern those affected by the specific site. A narrative description of the mitigation measures also sets out the Home Office's response to those concerns.

Maintenance issues

- 10.24** Each contingency asylum accommodation site has its own challenges in terms of maintenance. At 31 sites visited by inspectors it appeared that general maintenance issues were addressed quickly and efficiently. All of the sites visited either had onsite maintenance staff or easy access to maintenance staff.
- 10.25** Inspectors were consistently told that maintenance issues relating to the safety of service users should be raised directly with Migrant Help and recorded. However, most service users contacted the local welfare support officer (WSO) or the accommodation's management when issues emerged. WSOs and hotel staff told inspectors a record of the completed work was retained locally and that most maintenance issues were quickly resolved.
- 10.26** Inspectors observed that, where maintenance issues could not be easily fixed, rooms were temporarily decommissioned, and the service users relocated within the same premises, until the work was completed.

10.27 Some of the hotel accommodation visited during the inspection appeared tired, with worn fixtures and fittings and in need of redecoration. A common issue raised by service users was the ineffectiveness or noisiness of extractor fans. One hotel manager told inspectors that “extractor fans in the bathroom are a common problem in all hotels. They are noisy but if turned off mould then develops.” Passenger lifts were found to be out of order at two of the visited sites. Inspectors were told that they were out of service as a result of misuse by some of the service users and that no repairs were planned due to the expense involved.

Health and safety

10.28 The AASC states that the provider shall ensure that the accommodation is compliant with relevant UK fire safety laws and regulations.

10.29 The Home Office told inspectors that “the service providers undertake necessary due diligence, including health and safety and fire inspection checks before a hotel is occupied by asylum seekers ... due diligence checks were completed on accommodation providers to ensure that they had robust health and safety policies, procedures, and controls, prior to the contract being awarded”.

10.30 No significant fire safety issues were identified relating to any hazards during the course of the

inspection, although inspectors did not examine fire safety records at all sites.

- 10.31** The Bibby Stockholm received its first service users on board on 7 August 2023. The following day, Dorset Council notified the Home Office that legionella had been identified in the water system on the vessel. On 11 August 2023, all service users were removed and placed in hotel accommodation.
- 10.32** A subsequent internal review of the circumstances by a Home Office senior manager identified that poor communication between the local authority, the subcontractor and operator of the barge (Landry and Kling), and the Home Office had contributed to a delay in the decision to disembark the vessel. The review also recognised the need to clarify the respective roles and responsibilities of the contractor and the Home Office. The Home Office acknowledged that it held the “ultimate duty” for protecting the health and safety of those on board, and measures were put in place to prevent a recurrence of the incident.
- 10.33** In May 2023, the Government Internal Audit Agency (GIAA) conducted an internal audit of health and safety risk in hotel accommodation used for asylum seekers. The audit report identified that improvements were needed to enhance the adequacy and effectiveness of

the governance, risk management, and control framework.

10.34 The GIAA's main concerns were:

- communications between the Home Office and service users in hotel accommodation, in particular, ensuring that they fully understood the asylum process
- inconsistencies in how third-party providers handled and retained service users' personal information
- the recording and management of health and safety incidents
- assurance checks by the Asylum and Support Contracts – Assurance (ASC-A) team not including compliance with the provisions of the Health and Safety at Work etc. Act 1974

10.35 The Home Office accepted the recommendations from this audit and stated that “ASC-A will source Housing Health and Safety rating system training for our assurance staff. This will support understanding and identifying health and safety issues during inspections, and aid addressing these with our providers or third-party contractors as appropriate. We will also review the process to track the resolution of previously identified issues

enhancing inspection paperwork and ensuring ‘ownership’ of issues through to outcome”.^{170,171}

Conclusion – general security, and health and safety

10.36 Inspectors found that the sites they visited were in most cases safe and secure environments. However, inspectors shared the concerns of some service users, staff, and stakeholders about the incidents of disorder and violence at some locations, particularly sites housing large numbers of service users, but also at some hotels.

10.37 There were specific health and safety risks at Wethersfield and the Bibby Stockholm that had not been fully considered before service users were moved in, in the latter case requiring everyone to

170 Department for Communities and Local Government, 'Housing Health and Safety Rating System: Guidance for Landlords and Property Related Professionals' (published May 2006). <https://www.gov.uk/government/publications/housing-health-and-safety-rating-system-guidance-for-landlords-and-property-related-professionals>

171 In its factual accuracy response, the Home Office stated: “The Housing Health and Safety Rating System (HHSRS) training was delivered by the Chartered Institute of Environmental Health to all ASC-A property inspectors between February and May 2024.”

be removed from the barge due to the presence of legionella in the water system. The Home Office was working at pace to operationalise these sites, but it should not have allowed them to be occupied before all necessary health and safety risks had been addressed and assurance processes established.

- 10.38** On a day-to-day basis, the safety and security of everyone living or working at any contingency asylum accommodation site, and of the surrounding community, rely on a number of parties, including the Home Office, service providers and subcontractors, the police, local authorities, and other services. To avoid things falling between the cracks, it requires a joined-up approach, with clear guidelines and standards to be set and agreed, and defined responsibilities.
- 10.39** But, while others may manage and deliver what is required, the Home Office needs to recognise that it remains ultimately accountable. In mid-2023, a GIAA audit identified that record-keeping of health and safety incidents needed to improve. The department's recent responses to inspectors' requests for information confirmed that this remained the case one year on, and this extended to records of safety checks, security incidents (including where these involved the police) and outcomes, and the whereabouts of service users (if signing in and out is required, it needs to be

properly managed). Without better records, it is hard to see how the Home Office can identify trends or issues that require attention, and how it can show that it is meeting its responsibilities for the safety and welfare of contingency asylum accommodation service users.

Annex A: Role and remit of the Independent Chief Inspector

The role of the Independent Chief Inspector of Borders and Immigration (until 2012, the Chief Inspector of the UK Border Agency) was established by the UK Borders Act 2007. Sections 48-56 of the UK Borders Act 2007 (as amended) provide the legislative framework for the inspection of the efficiency and effectiveness of the performance of functions relating to immigration, asylum, nationality, and customs by the Home Secretary and by any person exercising such functions on her behalf. The legislation empowers the Independent Chief Inspector to monitor, report on, and make recommendations about all such functions and in particular:

- consistency of approach
- the practice and performance of listed persons compared to other persons doing similar activities
- the procedure in making decisions
- the treatment of claimants and applicants
- certification under section 94 of the Nationality, Immigration and Asylum Act 2002 (c. 41) (unfounded claim)

- the law about discrimination in the exercise of functions, including reliance on paragraph 17 of Schedule 3 to the Equality Act 2010 (exception for immigration functions)
- the procedure in relation to the exercise of enforcement powers (including powers of arrest, entry, search and seizure)
- practice and procedure in relation to the prevention, detection and investigation of offences
- the procedure in relation to the conduct of criminal proceedings
- whether customs functions have been appropriately exercised by the Secretary of State and the Director of Border Revenue
- the provision of information
- the handling of complaints; and
- the content of information about conditions in countries outside the United Kingdom, which the Secretary of State compiles and makes available, for purposes connected with immigration and asylum, to immigration officers and other officials.

In addition, the legislation enables the Secretary of State to request the Independent Chief Inspector to report to her in writing in relation to specified matters.

The legislation requires the Independent Chief Inspector to report in writing to the Secretary of State. The

Secretary of State lays all reports before Parliament, which she has committed to do within eight weeks of receipt, subject to both Houses of Parliament being in session.

Reports are published in full except for any material that the Secretary of State determines it is undesirable to publish for reasons of national security or where publication might jeopardise an individual's safety, in which case the legislation permits the Secretary of State to omit the relevant passages from the published report.

As soon as a report has been laid in Parliament, it is published on the inspectorate's website, together with the Home Office's response to the report and recommendations.

Annex B: ICIBI

‘expectations’ of asylum, immigration, nationality and customs functions

Background and explanatory documents are easy to understand and use (e.g., statements of intent (both ministerial and managerial), impact assessments, legislation, policies, guidance, instructions, strategies, business plans, intranet and GOV.UK pages, posters, leaflets etc.)

- They are written in plain, unambiguous English (with foreign language versions available, where appropriate)
- They are kept up to date
- They are readily accessible to anyone who needs to rely on them (with online signposting and links, wherever possible)

Processes are simple to follow and transparent

- They are IT-enabled and include input formatting to prevent users from making data entry errors
- Mandatory requirements, including the nature and extent of evidence required to support applications and claims, are clearly defined
- The potential for blockages and delays is designed out, wherever possible
- They are resourced to meet time and quality standards (including legal requirements, Service Level Agreements, published targets)

Anyone exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary is fully competent

- Individuals understand their role, responsibilities, accountabilities and powers
- Everyone receives the training they need for their current role and for their professional development, plus regular feedback on their performance
- Individuals and teams have the tools, support and leadership they need to perform efficiently, effectively and lawfully

- Everyone is making full use of their powers and capabilities, including to prevent, detect, investigate and, where appropriate, prosecute offences
- The workplace culture ensures that individuals feel able to raise concerns and issues without fear of the consequences

Decisions and actions are ‘right first time’

- They are demonstrably evidence-based or, where appropriate, intelligence-led
- They are made in accordance with relevant legislation and guidance
- They are reasonable (in light of the available evidence) and consistent
- They are recorded and communicated accurately, in the required format and detail, and can be readily retrieved (with due regard to data protection requirements)

Errors are identified, acknowledged and promptly ‘put right’

- Safeguards, management oversight, and quality assurance measures are in place, are tested and are seen to be effective

- Complaints are handled efficiently, effectively and consistently
- Lessons are learned and shared, including from administrative reviews and litigation
- There is a commitment to continuous improvement, including by the prompt implementation of recommendations from reviews, inspections and audits

Each immigration, asylum, nationality or customs function has a Home Office ‘owner’

The Home Office ‘owner’ is accountable for:

- implementation of relevant policies and processes
- performance (informed by routine collection and analysis of Management Information (MI) and data, and monitoring of agreed targets/deliverables/budgets)
- resourcing (including workforce planning and capability development, including knowledge and information management)
- managing risks (including maintaining a Risk Register)
- communications, collaborations and deconfliction within the Home Office, with other government departments and agencies, and other affected bodies

- effective monitoring and management of relevant contracted out services
- stakeholder engagement (including customers, applicants, claimants and their representatives)

Annex C: Asylum accommodation contracts

Figure 17: Asylum accommodation contracts

Contract	Contract scope	Supplier	Total contract value	Contract start	Contract end
Asylum Accommodation and Support Contracts (AASCs)	Accommodation provision (dispersal accommodation and initial accommodation), asylum support services, asylum transport	Mears		8 January 2019	31 August 2029
Northern Ireland			Northern Ireland – £113m		
Scotland			Scotland – £514m		
North East & Yorkshire			North East & Yorkshire – £821m		
AASC		Serco			31 August 2029
Midlands & East of England			Midlands & East of England – £1.03bn		
North West England			North West England – £1.08bn		
AASC		Clearsprings Ready Homes			31 August 2029
South England			South England – £662m		
Wales			Wales – £334m		

Contract	Contract scope	Supplier	Total contract value	Contract start	Contract end
Advice, Issue Reporting & Eligibility (AIRE) Contract	Asylum Seeker Support (including complaint processing)	Migrant Help	£50.5m	1 March 2019	31 August 2026 ¹⁷²
Asylum & Protection Bridging Accommodation and Travel Services Contract	Contingency accommodation & associated services for Asylum Seekers & Afghan & unaccompanied asylum-seeking children cohorts	Corporate Travel Management (CTM) North Ltd	£1.56bn	26 February 2023	26 February 2025

172 In its factual accuracy response, the Home Office explained: “The AIRE contract was due to expire on 31st August 2023, but it has inbuilt contract extension options of 3 + 3 years. This contract has been extended until 31st August 2026. In due course, consideration will be given to the potential further extension until 31st August 2029.”

Annex D: Data and management information

Figure 18: The location of contingency asylum accommodation (CAA) sites and total occupancy of CAA sites by Strategic Migration Partnership (SMP) region¹⁷³

SMP region	Total CAA sites	Total bed spaces	Total current occupancy
East Midlands	24	3,142	2,846
East Of England	38	7,689	5,618
London	89	26,051	16,229
North East	9	1,172	444
North West	34	5,571	4,071
Northern Ireland	45	1,483	592
Scotland	19	2,209	1,430
South East	43	8,725	5,629
South West	19	4,635	3,000
Wales	26	294	183
West Midlands	37	6,109	5,414
Yorkshire And The Humber	32	4,549	2,401
Total	415	71,629	47,857

173 Bedspace data was not supplied for 67 sites.

Figure 19: The number of contingency asylum accommodation (CAA) sites, total bed spaces and current occupancy, by service provider¹⁷⁴

Contractor	Total number of CAA sites	Total bed spaces	Total current occupancy
Clearsprings Ready Homes	207	46,249	29,817
Mears	105	9,413	4,867
Serco	103	15,967	13,173
Total	415	71,629	47,857

174 Bedspace data was not supplied for 67 sites.

Annex E: Photographs of asylum accommodation

Figure 20: Napier Barracks reception room

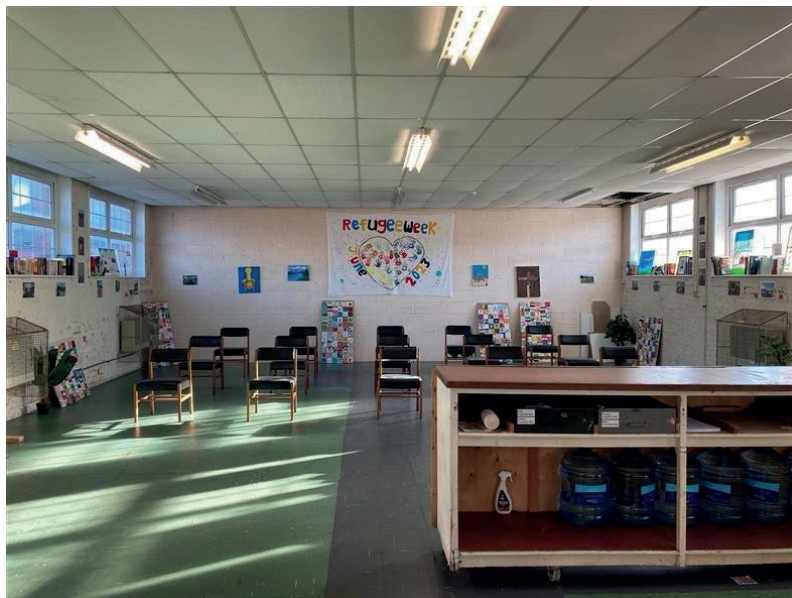


Figure 21: Bedroom at hotel accommodation for single females in London



Figure 22: Dormitory bedroom at hostel accommodation for single males in London

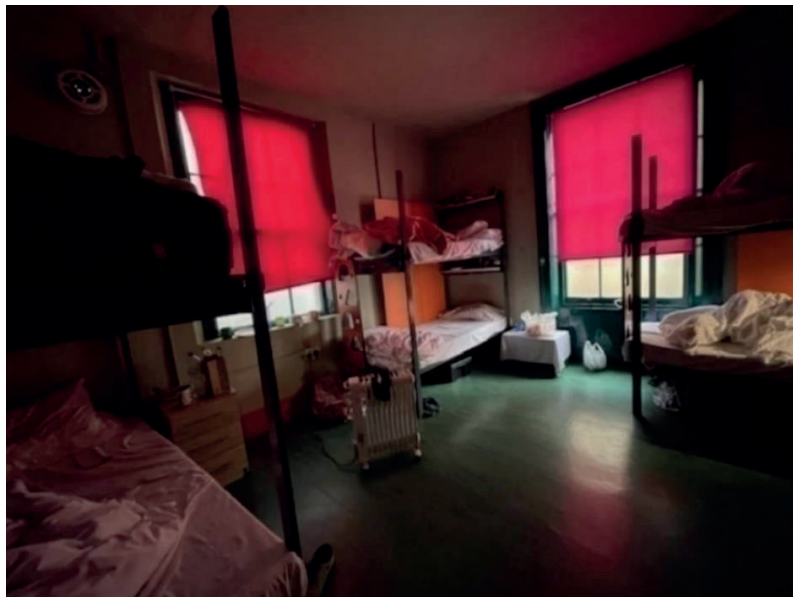


Figure 23: Bedroom at hotel accommodation for single female and family groups in the Preston area



Figures 24 and 25: Bedroom at hotel accommodation for single males in Birmingham

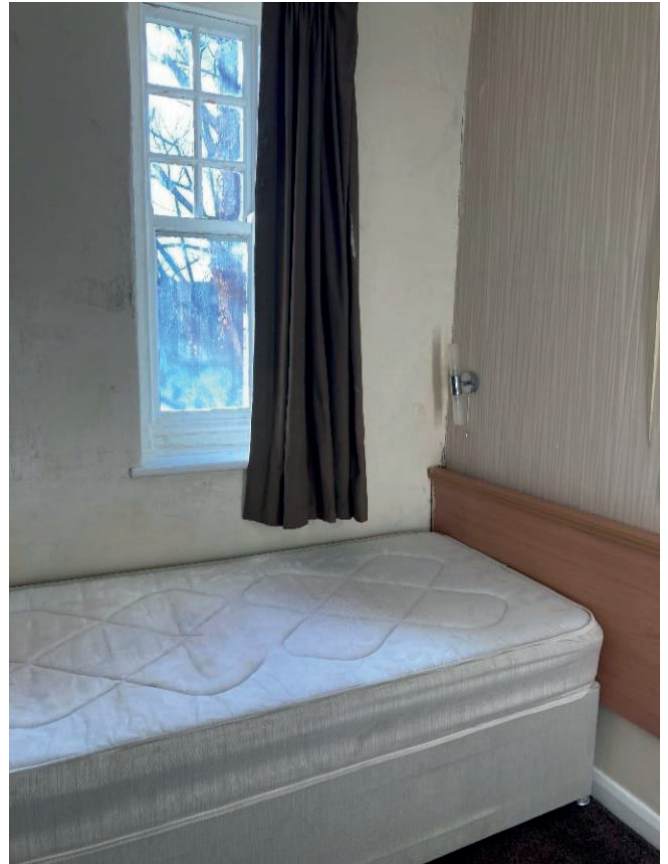


Figure 26: Bedroom at hostel accommodation for single females in Glasgow



Figures 27 and 28: En suite facilities in hotel accommodation for single females and family groups in Blackpool



Figures 29 and 30: Dormitory facilities for single males at Napier Barracks

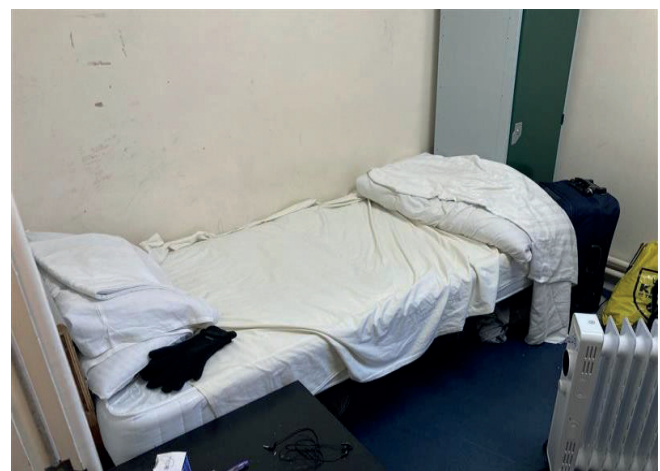
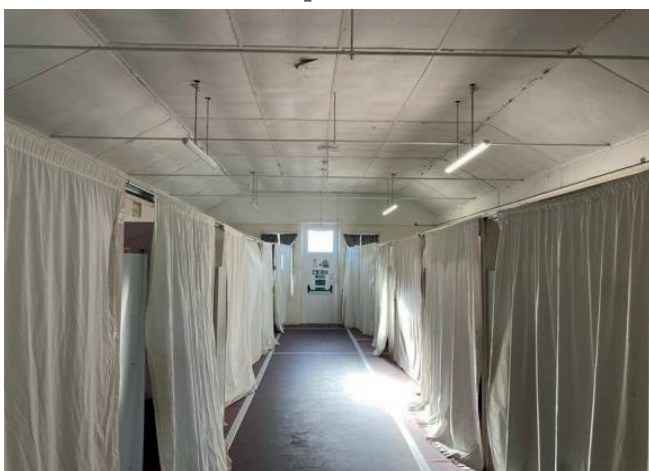


Figure 31: Recreational facilities at a hotel in Birmingham



Annex F: ICIBI letter to the Home Secretary, 20 December 2023



The Rt Hon James Cleverly TD VR MP
Home Secretary
Home Office
2 Marsham Street
London SW1P 4DF

20 December 2023

Dear Home Secretary,

I very much hope that a meeting will be scheduled with you soon to discuss the work of the ICIBI. In the meantime, I wanted to bring a matter to your attention that cannot wait until then.

I visited Wethersfield yesterday with my team as part of my ongoing contingency asylum accommodation inspection. I was last at the site on 2 August 2023 when there were 30 service users. Four months later, with a service user population of 565 I am sufficiently concerned with the situation to bring this matter to your immediate attention.

I was briefed yesterday by Home Office and contractor staff onsite about incidents of violence amongst service users that had recently taken place at the site. I understand that in response to these incidents of violence, security was increased to reduce tension and a member of staff was recently brought in from Small Boats Operational Command to both address the security situation and increase the Home Office permanent presence at the site. This staff move is a positive step, but they have neither the experience of residential settings nor the training to deliver solutions and address what could become a serious issue over the coming weeks.

While managers are tackling operational challenges, I am concerned that you will not be fully aware of the significant risk to the safe and controlled functioning of the site. You will doubtless be familiar with the events of 2015 when Libyan soldiers were housed in Bassingbourn Camp. In a desire to deliver the mission and present a positive picture upwards, a kind of Stockholm Syndrome emerged from those running the site. Isolated assaults on staff led to increased security and anxiety amongst staff, which led to increased violence. I fear that some of the factors experienced at Bassingbourn are present at Wethersfield now. I was informed that the wi-fi signal, vital for service users with no purposeful activities on site, was insufficient and login details posted on signs were incorrect. Should a problem with the wi-fi or another issue increase tensions on the site, the only response would be more security.

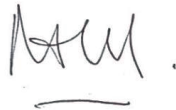
The Home Office's initial unsophisticated delivery of services at Napier Barracks in 2021 resulted in the arson attack on one of the blocks. I am afraid that this will be repeated if professional advice in the form of experienced HMPPS personnel are not brought in to assess the emerging situation and, using their experience of custodial settings, advise on potential solutions. The Home Office needs the best quality advice from experts who understand how best to keep hundreds of men occupied in an isolated camp. Purposeful activity for service users falls significantly behind the provision at Napier Barracks and putative provision at Bibby Stockholm. Very little progress has been made since my visit on 2 August 2023.

In summary, on the evidence of yesterday's inspection I am not confident that the Home Office has the right people, or the right plans, or that it is moving at sufficient speed to keep service users safe. Unless this is addressed as a matter of urgency, I predict the frustration of service users will lead to increased criminality, including arson.

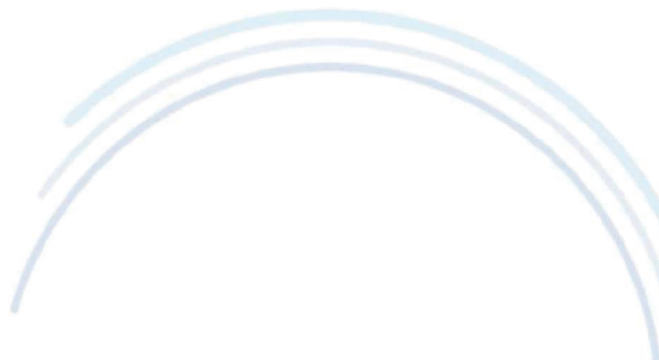
I intend to visit Wethersfield again early in the New Year as part of this inspection. My current inspection examines much more than just Wethersfield and is likely to be completed in March 2024.

I am at your disposal to discuss this, or any matters, over the Christmas period.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'D Neal', with a horizontal line underneath.

David Neal
Independent Chief Inspector of Borders and Immigration



Annex G: ICIBI letter to the Immigration Minister, 9 February 2024

Tom Pursglove MP
Minister of State for Legal Migration and the Border
Home Office
2 Marsham Street
London
SW1P 4DF



9 February 2024

Dear Minister,

I visited Wethersfield yesterday as part of my ongoing inspection of contingency asylum accommodation. This visit follows on from one I conducted on 19 December 2023. I delayed my planned re-visit by two weeks at the request of Home Office officials following notification of the attempted suicide of a service user in the camp on the evening of 23 January 2024.

After my visit in December, I was so concerned about what I had seen that I wrote to the Home Secretary, and I have since had the opportunity to brief you both in person. In particular, I raised my concern about the lack of purposeful activity for service users. I observed that the absence of such provision was likely to have a deleterious impact on residents' mental health and that it heightened the risk of disorder at the site. After my inspection visit yesterday, I can report that there has been no improvement: Nothing substantive has been delivered to relieve, and to mitigate the risks resulting from, the tensions that will inevitably arise when a sizeable population of men is being accommodated in a remote location, with very limited information on what the future might hold for them and with very little to do.

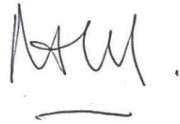
There were 555 service users at Wethersfield yesterday, all of whom face uncertainty and boredom while lacking constructive outlets for their energies. By failing to provide access to purposeful activity, the Home Office is allowing a febrile atmosphere to develop at the camp. I spoke to a number of men, and it was clear to me that there was an overwhelming feeling of hopelessness caused by boredom which invariably, in my experience, leads to violence. In fact, during my focus group two service users needed to be calmed down by the interpreter after their frustrations were in danger of spilling over into violence. All members of the focus group were unhappy, and all complained of deteriorating mental health. The pernicious effect of boredom is accepted by the Home Office staff on the site. I have been briefed on plans to deliver enrichment activity, but nothing has actually been delivered since my last visit.

Officials informed me yesterday that a decision was likely on 12 February 2024 on whether to increase the number of service users accommodated at the site to 800. On the basis of what I saw and heard during my visit, I am concerned that this expansion in numbers would significantly increase the risk of a serious incident

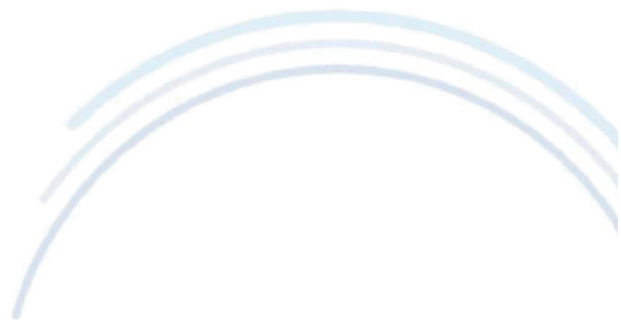
impacting on the safety and wellbeing of Home Office staff, contractors, and service users onsite.

I am therefore writing to you urgently to express these concerns, as this is a time-sensitive matter that will not wait until the meeting I have requested with you to discuss my recent inspection of general aviation at London City Airport.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Neal', with a horizontal line underneath.

David Neal
Independent Chief Inspector of Borders and Immigration




Acknowledgements

The inspection team is grateful to Home Office for its co-operation and assistance during this inspection, and for the contributions from the staff and stakeholders who participated.

Inspection team members

Lead Inspector:	Phil Insuli
Project Manager:	Katie Kennedy
Inspector:	Jessica Churchouse
Inspector:	Andrew Hobkirk
Inspector:	Amy Lyall
Inspector:	Harry Palmer
Inspector:	Chris Thompson
Inspector:	Simone Thompson
Inspector:	Rachael Wood



978-1-5286-5175-2
E03198215