



Equality Impact Assessment [EIA]

Section 1: MOD015 (Bicester)

This EIA considers the equality implications of the planned asylum accommodation site on Ministry of Defence site at Bicester (MOD 015) which is being considered to form part of the Home Office's Non-Detained Accommodation Estate as part of the Asylum Accommodation Programme (AAP).

Bicester (MOD015) – Proposed temporary use as asylum accommodation

In recent years, the number of applications for asylum has been at high levels by historical standards. The number of asylum applications made in the year ending 31 December 2025 (which was published on 26 February 2026¹) was 82,140, (which related to 100,625 individuals as more than one applicant can be included in a single application). Prior to this, asylum claims were particularly high in the early 2000s, peaking at 103,000 in 2002, due to large number of people fleeing persecution from countries with conflicts and political instability.

Following this previous peak, from 2004 to 2020 between 22,000 and 46,000 people claimed asylum in the UK each year. However, since the second half of 2021, there has been a noticeable increase. The number of people claiming asylum reached over 109,000, in 2024, is the highest number on record (going back to 1979).² While it reduced again in 2025, it remained above 100,000.

The number of asylum applications made in the UK each calendar year since 2018 is as follows:

Asylum Applications received in the UK 2018 to 2025								
Year	2018	2019	2020	2021	2022	2023	2024	2025
Total	29,504	35,737	29,440	48,182	76,948	68,462	82,368	82,140

The increased volume of asylum applications received has in turn translated into an increased number of non-detained asylum seekers requiring accommodation.

On 2 June 2026, Regulation 5 (the duty to provide asylum support) of the Asylum Seekers (Reception Conditions) Regulations 2026 will be revoked. Following this change the Home Office still has a legal power, as set out in the Immigration and Asylum Act 1999, to support asylum seekers (including any dependants) who would otherwise be destitute, so a supply of accommodation will still be required.

¹ [Immigration system statistics data tables - GOV.UK](#)

² [How many people claim asylum in the UK? - GOV.UK](#)

Section 97 of the 1999 Act provides that, in exercising the power to provide accommodation, caseworkers must have regard to the desirability, in general, of providing accommodation in areas in which there is a ready supply. Caseworkers must not have regard to the person's preferences. The overriding principle when allocating accommodation is that it is offered on a no-choice basis and in all areas of the UK where the Home Office has a supply of accommodation available.

The increased volume of asylum applications received has in turn translated into an increased number of non-detained asylum seekers requiring accommodation.

Support may also be available to failed asylum seekers, whose claims are declared inadmissible or to those whose claim has been considered and refused, via section 4 support. The SSHD may use the same power to accommodate, if they meet at least one of the five conditions set out in the Immigration and Asylum (Provision of Accommodation to Failed Asylum Seekers) Regulations 2005³. Those conditions are broadly that there is a practical or legal obstacle to them leaving the UK.

Hotels as Contingency Accommodation

Owing to the numbers in need of accommodation, the government has been reliant on hotels as Contingency Accommodation. The Government has pledged to end the use of asylum hotels in this parliament.

The use of such hotels was intended as a short-term solution; they are not sustainable as a long-term solution because, the supply could strain relations with local authorities and local communities, they could become a potential focal point for protest, and they may be more expensive than other forms of accommodation.

Other options such as relying on parts of the private rental sector bring similar risks. Additionally, the Home Office risks competing with those who have UK residency rights for rental properties, potentially reducing supply and increasing rental costs across the private rental market. Such risks can have a serious impact on the Home Office's ability to acquire and provide accommodation in accordance with its statutory duties.

The Government convened an Asylum Accommodation Taskforce to work across Government to deliver alternative asylum accommodation. This has looked at a range of more appropriate sites including Large, ex-military sites, so we can reduce the impact on communities.

³ [The Immigration and Asylum \(Provision of Accommodation to Failed Asylum-Seekers\) Regulations 2005](#)

Collective accommodation, including Large Sites, if implemented well, can deliver benefits supporting more efficient processing of cases and minimising pressure on local services through provisions onsite.

Bicester proposal and operational context

MOD Bicester is a defence storage site in Oxfordshire. The planned HO site, 5 hectares of the larger site, is intended to provide self-sufficient accommodation site with catering, laundry and space for healthcare services and recreational and interview facilities. The Home Office intends to use the site at Bicester to accommodate up to 1,256 asylum seekers through a phased delivery model. The site will provide a flexible and operationally resilient component of the national asylum accommodation estate, supporting the Home Office's ability to manage accommodation demand, occupancy pressures and movement through the estate.

The site is intended to accommodate Single Adult Males (SAMs) aged 18 to 65. Admissions to the site will be managed in line with the allocation of accommodation policy, operational requirements and may be subject to daily or weekly limits, consistent with arrangements at similar ex-MOD sites.

A maximum length of stay may be imposed, as is the case at some other non-detained accommodation sites within the asylum estate; however, this will be subject to confirmation through Business Design and operational planning.

The site will provide essential onsite services to reduce pressure on local amenities, such as catering, laundry, welfare, safeguarding, and initial health triage.

Section 2: Consideration of aim 1 of the duty: eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the Equality Act 2010

a. Direct discrimination

Age

DATE OF CLAIM	2020	2021	2022	2023	2024	2025
TOTAL PEOPLE UNDER 14	37,603	57,942	95,007	87,427	104,764	100,625
14 - 15	5,754	6,484	11,119	11,799	13,203	10,978
16 - 17	1,001	1,315	2,589	1,938	2,098	1,657
18+	2,589	4,433	6,177	5,171	5,160	4,075
	28,258	45,710	75,122	68,518	84,303	83,915

All accommodation decisions are made on needs basis. Children (under 18) are excluded from Bicester because Unaccompanied Asylum-Seeking Children

(UASC) fall under the statutory responsibility of local authorities and family groups are housed in dedicated family accommodation elsewhere. These arrangements are essential for safeguarding and reflect the fact that many asylum applicants requiring accommodation are adults.

Statistical trends clearly demonstrate that those in the 18 to 49 age range consistently form majority of asylum applicants. This is shown in the most recent quarterly asylum statistics:

Asylum Applications (Main and dependent) by age per quarter⁴								
Age range	2024 Q1	2024 Q2	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4
U18	4,433	5,085	5,864	5,079	3,991	4,310	5,137	3,272
18 - 29	9,546	10,621	13,461	14,518	10,508	13,121	14,979	10,355
30 - 49	6,700	7,279	8,856	9,392	7,447	8,464	8,958	6,339
50 - 69	748	787	942	1,036	837	898	948	671
70+	81	108	102	126	91	99	112	88
Unknown	0	0	0	0	0	0	0	0
Total	21,508	23,880	29,225	30,151	22,874	26,892	30,134	20,725

Older adults (50–69 and 70+) represent a very small minority of applicants and may have additional support or accessibility needs not compatible with Bicester's eventual design. Where an asylum seeker's age- or age-related need renders Bicester unsuitable, they will be allocated to alternative accommodation within the Home Office estate.

The operation, as currently assessed, at Bicester is considered to be directly discriminatory in relation to age.

However, this discrimination is permissible (lawful) under s.13(2) of the Equality Act 2010 which provides an exception in relation to this protected characteristic if the treatment is justified as a proportionate means of achieving a legitimate aim — namely, fulfilling statutory duties to accommodate asylum seekers safely and appropriately aligning individuals to accommodation suitable for their assessed needs .

Also, schedule 18 of the Equality Act 2010 sets out limited exceptions to the application of the general equality duty, in relation to the exercise of immigration and nationality functions. The general equality duty S149(1)(b) - due regard to the need to advance equality of opportunity - is disapplied in relation to the protected characteristics of age, race (excluding colour) or religion or belief of age (paragraph 2(1)).

Sex

Decisions to provide accommodation to asylum seekers are made on a need's basis, regardless of sex. Bicester will however accommodate single adult males only, which potentially constitutes less favourable treatment for those

⁴ [Immigration system statistics data tables - GOV.UK](https://www.gov.uk/government/statistics/immigration-system-statistics)

accommodated at or excluded from the accommodation at Bicester. Female asylum seekers with equivalent needs and support will instead be accommodated in suitable alternative provision elsewhere.

On this basis the provision of accommodation at Bicester **is** assessed to be directly discriminatory in relation to sex, however, on consideration, this discrimination is permissible (lawful) under schedule 23(3)⁵ of the Equality Act 2010 Act in relation to communal accommodation.

Para 3(5) defines communal accommodation as,

“Residential accommodation which includes dormitories or other shared sleeping accommodation which for reasons of privacy should be used only by persons of the same sex”.

Schedule 23(3) provides,

“Communal accommodation may include — (a) shared sleeping accommodation for men and for women; (b) ordinary sleeping accommodation; (c) residential accommodation all or part of which should be used only by persons of the same sex because of the nature of the sanitary facilities serving the accommodation.”

Having given further consideration to paragraph 3(3) and Schedule 23, on (a) whether and how far it is reasonable to expect that the accommodation should be altered or extended or that further accommodation should be provided, and (b) the frequency of the demand or need for use of the accommodation by persons of one sex as compared with those of the other, in theory, it would be possible to have a mixed site and have female-only and male-only apartments.

However, both historically and currently, there are far more male asylum seekers than female asylum seekers with male asylum seekers (of all ages) consistently equating to between 70 and 80% of all adult asylum applications received in the UK (see table below). This creates a greater and more pressing need for accommodation suitable for males than for female asylum seekers.

We have also considered whether the provisions of Schedule 3, paragraph 27, apply:

*“A person does not contravene section 29, so far as relating to sex discrimination, by providing a service only to persons of one sex if—
(a) any of the conditions in sub-paragraphs (2) to (7) is satisfied, and
(b) the limited provision is a proportionate means of achieving a legitimate aim.”*

The relevant conditions are:

*“(4) The condition is that—
(a) a joint service for persons of both sexes would be less effective, and*

⁵ [Equality Act 2010 schedule 23](#)

(b) the extent to which the service is required by persons of each sex makes it not reasonably practicable to provide separate services.

(5) The condition is that the service is provided at a place which is, or is part of—

(a) a hospital, or

(b) another establishment for persons requiring special care, supervision or attention.

In relation to condition 4, it is clear that the asylum claims are overwhelmingly made by males:

Applications by Gender (Aged 18+) ⁶ 2022 to 2025					
Asylum Claims	2022	2023	2024	2025	Cumulative
Male	58,376	50,510	61,768	62,259	232,913
Female	16,662	17,996	22,512	21,640	78,810
Unknown	84	31	23	16	154
Total	75,122	68,537	84,303	83,915	311,877
Male %*	77.71	73.70	73.27	74.19	74.68
Female %*	22.18	26.28	26.70	25.79	25.27

* Rounded to two decimal places

Further, as the site currently does not have suitable facilities for children and many female asylum seekers are accompanied by children, it is less effective and inappropriate to accommodate families at Bicester. Adult females (aged 18 and over), and all female (and male) asylum seekers (either unaccompanied or part of a family group) under 18 who require accommodation will be provided with appropriate accommodation elsewhere.

In relation to paragraph 27(b), we regard the provision of accommodation to males as a proportionate means of achieving the legitimate aim of the secretary of state fulfilling her statutory duties to accommodate asylum seekers safely and appropriately aligning individuals to accommodation suitable for their assessed needs.

In addition, Schedule 3, Paragraph 27, condition 5 (provision of service at an establishment for persons requiring special care, supervision or attention) might also be held to apply.

Currently, ex-MoD sites are only for male asylum seekers.

The operation, as currently assessed, at Bicester is considered to be directly discriminatory in relation to sex.

⁶ [Immigration system statistics data tables - GOV.UK](#)

However, this discrimination is permissible (lawful) under schedule 23(3) of the Equality Act 2010 which permits sex discrimination - in relation to communal accommodation - as being a proportionate means of achieving a legitimate aim. In addition (and without prejudice to the above) the discrimination is also permissible (lawful) under schedule 3(27) of the Equality Act 2010, which permits sex discrimination in relation to the provision of services to persons of one sex (provided certain conditions are satisfied) as being a proportionate means of achieving a legitimate aim.

Marriage & Civil Partnership

Marriage and civil partnership discrimination does not arise in the provision of services (including providing asylum accommodation as part 3 of the Equality Act which governs discrimination in the provision of goods, services and public functions expressly excludes marriage and civil partnership as protected characteristics). The need to pay due regard to eliminating unlawful discrimination under S.149 Equality Act does however apply.

The status of an individual's marriage and civil partnership is not considered as part of decisions to provide accommodation.

As assessed, the accommodation at Bicester is not considered to be directly discriminatory, given that those who are married and/or in civil partnerships are not treated less favourably than those who are not.

However, as the site is for single adult males, those married or in civil partnerships where both partners have claimed asylum together will not be accommodated at this site but will be accommodated together elsewhere in the asylum accommodation estate.

As ex-MoD site which only accommodate SAMs, if it is subsequently identified that a partner of a SAM accommodated at Bicester has also claimed asylum in the UK then it may be possible to arrange for both partners to be accommodated together elsewhere in the asylum estate appropriate to their needs via the Change of Circumstances process, provided both parties wish to be accommodated together.

Where it is subsequently identified that a married or civil partner of an asylum seeker accommodated at this site has also claimed asylum in the UK then, via the Change of Circumstances process, it will be possible to arrange for both partners to be accommodated together elsewhere in the asylum estate appropriate to their needs, provided both wish to be accommodated together.

Other protected characteristics

Consideration has been given to direct discrimination on the grounds of the following protected characteristics and **as currently assessed, Bicester is not considered to be directly discriminatory to these:**

Disability

Asylum seekers with accommodation-related care needs that are not linked to destitution fall to be assisted by local authorities under separate statutory arrangements: the Care Act 2014⁷ or the Children Act 1989⁸ (or equivalent legislation in Scotland, Wales, and Northern Ireland), following an appropriate care assessment by the relevant local authority.

Where the disability is less severe, asylum seekers may be eligible to be supported by the Home Office under the 1999 Act but may be found unsuitable (on an individual basis) to be accommodated at this Site given their specific needs in line with the suitability policy⁹, as the Site and rooms are not adapted for those with particular accessibility needs and could prevent service users making full use of the Site's amenities and facilities.

There is an additional duty under the Equality Act to make reasonable adjustments¹⁰ for an asylum seeker placed at a substantial disadvantage because of disability when compared to a person who does not share their disability.

The needs will be assessed on a case-by-case basis, and reasonable adjustments will be made where such adjustments meet asylum seekers needs within the Site's service provision for accommodation to be provided.

Individual asylum seekers whose needs cannot be met are generally identified through normal asylum casework processes – in particular the asylum screening conducted when they first claim asylum in the UK and the ASF1 form when an individual applies for asylum support.

Additionally, suitability will be monitored on an ongoing basis to ensure there continues to be a focus on the individual's wellbeing after they arrive at the Site to identify any emerging risks.

Where it becomes evident that the needs of an individual asylum seeker are not being met at the Site, the Home Office will be notified, and the individual will be transferred to other accommodation. This is relevant to the extent that such vulnerabilities may constitute a disability for the purpose of an equality's consideration.

The accommodation operation, as currently assessed, at Bicester is not considered to be directly discriminatory in relation to disability.

Gender Reassignment

Decisions to provide accommodation at Bicester to an adult asylum seeker are made on case-by-case basis determined by individual needs, regardless of gender reassignment.

⁷ [Care Act 2014](#)

⁸ [Children Act 1989](#)

⁹ [Healthcare needs and pregnancy dispersal instruction](#)

¹⁰ [Equality Act 2010: Reasonable adjustments: a legal duty - Guidance](#)

The Home Office does not routinely collect information based on gender reassignment.

However, it is possible that individuals with this protected characteristic, who share communal facilities, may suffer some form of prejudice, in the form of hostile or abusive behaviour, if accommodated alongside others who do not share this protected characteristic.

Accommodation of those who have completed or who are going through gender reassignment is considered on a case-by-case basis, and where there are safeguarding concerns because of their gender reassignment, they are, as appropriate, moved to alternative accommodation within the accommodation estate.

The current operation, as currently assessed, at Bicester is therefore not considered to be directly discriminatory in relation to gender reassignment.

Pregnancy and maternity

Bicester is not intended to accommodate female asylum seekers. The Home Office does not collect or record information on pregnancy and maternity status of individuals in a reportable format.

However, based on the number of those applying for maternity grants, in 2021/22 approximately 2,100 people in the asylum support system were pregnant.

Adult female asylum seekers will not be accommodated at the Site. Women, pregnant asylum seekers and asylum seekers with children are accommodated elsewhere in the asylum accommodation estate. Pregnancy and maternity status are not considered as part of this proposal as the Site will, as currently developed, only accommodate male asylum seekers.

The accommodation provision, as currently assessed, at Bicester is not considered to be directly discriminatory in relation to pregnancy and maternity.

Race

Statistics published Home Office indicate that the asylum cohort includes individuals from a wide range of nationalities, with recent years seeing higher volumes from a small number of conflict-affected countries.

NATIONALITY	INITIAL DECISIONS 2025 (CASES)	- INITIAL DECISIONS - 2025 (PEOPLE)	GRANT RATE - 2025 (CASES)
ERITREA	7,894	8,316	87%

AFGHANISTAN	8,232	8,874	28%
IRAN	5,819	6,579	47%
SUDAN	4,790	5,251	94%
SOMALIA	2,382	2,515	30%
ETHIOPIA	1,481	1,566	56%
IRAQ	2,074	2,971	25%
SYRIA	489	520	4%
VIETNAM	1,783	1,884	13%
YEMEN	2,076	2,086	97%
ALL NATIONALITIES	46,232	51,043	52%

However, regardless of nationality and race, all decisions on each asylum seeker requiring accommodation are made on an individual basis as set out in the Allocation of Asylum Accommodation policy¹¹ and the Asylum Accommodation and Support Contracts Statement of Requirements¹².

As this Site will accommodate asylum seekers from various countries and backgrounds, it is not considered to be directly or indirectly discriminatory in relation to race, either for those living on site, or to other asylum seeker cohorts who are in accommodation elsewhere.

Those who are not deemed suitable to be accommodated at this Site will be provided with suitable accommodation elsewhere within the existing estate.

The operation, as currently assessed, at Bicester is not considered to be directly discriminatory in relation to race.

Religion or Belief

The Home Office does not collect data about the religious beliefs of those applying for asylum support. However, by virtue of the profile of the top nationalities receiving support (as set out in Published Statistics on Asylum Seekers) a significant proportion of those individuals will identify as Christian or Muslim, though the proportion that practise their religion and to what extent is not known.

All decisions to provide accommodation to an adult asylum seeker are made on an individual need-basis, regardless of religion. Consideration of whether an asylum seeker is destitute is based on establishing facts and evidence.

Asylum seekers accommodated at Bicester will be provided with meals on site. Catering provision will be designed to take account of dietary, cultural and religious needs, supported by existing safeguarding and welfare arrangements.

¹¹ [Allocation of Asylum Accommodation Policy \(Accessible\)](#)

¹² [Asylum Accommodation & Support Contract \(Schedule 2\) Statement of Requirements](#)

The Site will have dedicated multi-faith facilities available 24/7 to those who need them. This will allow service users to manifest their religion or belief (Article 9) while reducing reliance on travelling into the local area for worship. As the site is non-detained, however asylum seekers will also be able to freely access local places of worship and practise their religion or belief.

The provision of multi-faith facilities will help to accommodate the diverse culture and religious background of those accommodated on Site, and the meeting of their spiritual needs as far as practicable. The different denominations within Christianity and Islam, it is recognised, could cause tensions. Steps to manage any tensions will be taken in line with existing policy and operational practice across the Site.

The operation, as currently assessed, at Bicester is not considered to be directly discriminatory in relation to religion or belief.

Sexual Orientation

All decisions to provide accommodation to an adult asylum seeker are made on an individual needs' basis, regardless of sexual orientation. Consideration of whether an asylum seeker is destitute is based on establishing fact and evidence.

Since 2018, the Home Office has published statistics on asylum cases where a person's sexual orientation formed a part of the basis of their claim (noting that this is protected characteristics for all applicants, regardless of whether it forms part of their claim).

In 2023, 2% of asylum claims in the UK (1,377 claims) included sexual orientation as part of the basis for the claim (LGB asylum applications). For the majority of nationalities, LGB asylum applications accounted for a small proportion of overall number of asylum applications. Applicants are not required to disclose their sexual orientation when applying for asylum. Therefore, the statistics held by the Home Office reflect the claims made by asylum applicants and do not reflect a confirmed sexual orientation of the applicant.¹³

There is no evidence that individuals with the protected characteristic of sexual orientation require a materially different form of support than others. There may, however, be some circumstances where an individual with this protected characteristic may be subjected to the prejudices of others and thus potentially subject to harassment and/or bullying. These issues will be handled on a case-by-case basis according to existing processes. Where an individual raises safeguarding concerns because of how others respond to their sexual orientation then they will be moved from the Site if there are concerns that their welfare is or would be compromised.

¹³ [Asylum claims on the basis of sexual orientation 2023 - GOV.UK](#)

The operation, as currently assessed, at Bicester is not considered to be directly discriminatory in relation to sexual orientation.

Section 2b: Indirect Discrimination

Any indirect disadvantage arising from the operation of the site is mitigated through the use of individual screening, ongoing welfare monitoring, safeguarding referral pathways, and the ability to relocate individuals to alternative accommodation where needs cannot be met on site. These measures ensure that any indirect discrimination impacts for those holding protected characteristics can, where possible, be appropriately addressed.

Age

As discussed above, the accommodation of those from the age of 18 to 65 at Bicester is considered to be direct age discrimination which can be objectively justified as a proportionate way of achieving a legitimate aim.

No indirect age discrimination has been identified, but the operation of the Site will be kept under review and this assessment updated as necessary.

Disability

The proposed operation of the Site, as currently assessed, at Bicester is not considered to be indirectly discriminatory in relation to disability. However, the operation of the Site will be kept under review and this assessment will be updated as necessary.

Gender Reassignment

The current operation, as currently assessed, at Bicester is not considered to be indirectly discriminatory in relation to Gender Reassignment. However, the operation of the Site will be kept under review, and this assessment will be updated as necessary.

Sexual Orientation

The operation, as currently assessed, at Bicester is not considered to be indirectly discriminatory in relation to sexual orientation. However, the operation of the Site will be kept under review, and this assessment will be updated as necessary.

Pregnancy and maternity

Adult female asylum seekers will not be accommodated at the site. Women, pregnant asylum seekers and asylum seekers with children are accommodated elsewhere in the asylum accommodation estate. Pregnancy and maternity status are not considered as part of this proposal as the site will, as currently developed, only accommodate male asylum seekers.

The operation, as currently assessed, at Bicester is not considered to be indirectly discriminatory in relation to pregnancy and maternity.

Race

The operation, as currently assessed, at Bicester is not considered to be indirectly discriminatory in relation to race. However, the operation of the Site will be kept under review, and this assessment will be updated as necessary.

Religion or Belief

The Home Office does not collect data about the religious beliefs of those applying for asylum support. However, by virtue of the profile of the top nationalities receiving support a significant proportion of those individuals will identify as Christian or Muslim, though the proportion that practise their religion and to what extent is not known.

Asylum seekers accommodated at Bicester will be provided with meals on site, with catering arrangements taking account of dietary, cultural and religious needs. Any concerns arising in relation to food provision will be managed through established welfare and safeguarding processes.

Facilitation of the practice of religion actively considers the diverse culture and religious background of those accommodated at this site, and the meeting of their spiritual needs as far as practicable. The majority of the supported population is from primarily Muslim countries which is predominantly split between Sunni and Shia dominations which, it is recognised, could cause tensions. Steps to manage any tensions will be taken in line with existing policy and operational practice across the estate.

As the site is non-detained, asylum seekers will be free to access local religious services and amenities where they may express and practise their religion or belief.

The operation, as currently assessed, at Bicester is not considered to be indirectly discriminatory in relation to religion or belief. However, the operation of the Site will be kept under review, and this assessment will be updated as necessary.

Section 3: Consideration of Aim 2 – Advancing Equality of Opportunity

The Home Office is exempt under paragraph 2 of Schedule 18 of the 2010 Equality Act to consider the provision under s.149(1)(b)¹⁴ (i.e. to advance equality of opportunity between those who have a protected characteristic and those who do not “limb 2”) in relation to immigration and nationality functions.

¹⁴ [Equality Act 2010](#)

The exemption under s.149(1)(b)¹⁵ of the public sector equality duty provisions in respect of race, religion or belief and age, where race relates to nationality or ethnicity or national origins but does not apply to colour.

As such, the following protected characteristics have been considered in respect of limb 2:

- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- sex
- sexual orientation
- race

The Home Office has considered, under the provision s.149(1)(b), advancing equality of opportunity between individuals who share a protected characteristic and individuals who do not share it.

The accommodation provision at Bicester does not alter the way asylum seekers supported under section 95 or section 98 of the Immigration and Asylum Act 1999¹⁶ are provided with support.

During the formulation of the proposals for Bicester, the Home Office has considered advancing equality of opportunity between asylum seekers accommodated at this site and those who are accommodated in accommodation elsewhere.

Asylum seekers accommodated at this site will be entitled to the same or equivalent support to those located elsewhere, as set out elsewhere in this document, and can participate in public life.

There is in any event no evidence that accommodating Single Adult Males in need of accommodation at this or similar sites, instead of at a hotel or other facility, will impact on the quality of support they receive or impair their ability to pursue their asylum claims.

Section 4: Consideration of aim 3 of the duty: Fostering good relations between people who share a protected characteristic and persons who do not share it

The duty is to have due regard to the need to foster good relations between individuals with different protected characteristics. The Equality Act specifies that this includes:

- tackling prejudice

¹⁵ [Equality Act 2010](#)

¹⁶ [Immigration and Asylum Act 1999](#)

- promoting understanding

Stakeholder Engagement

Initial engagement with local partners will be led by the Engagement and Integration team with a view to fostering community cohesion. This will include engagement with the local MP, the Local Authority, the local police force, primary health partners, and other relevant stakeholders. Engagement will continue through mobilisation, into operation and throughout decommissioning. It is intended that the site will be as self-sufficient as possible to minimise disruption for local communities.

Asylum seekers are already accommodated in the South-East of England Region in other types of asylum accommodation (such as initial and dispersed accommodation) and engagement will take account of the impact on the wider area. It is intended that the opening of the site will support the government's commitment to close hotels (as used for asylum accommodation) during this parliament, which in itself aims to promote community cohesion. Engagement will inform the ongoing management of the site, and the EIA will be reviewed and where necessary, updated, to reflect any material findings.

Various stakeholders will be engaged to support this limb, including:

- Primary health partners. They will be engaged to explore the provision of medical services on site, in line with arrangements at comparable sites. The nature and scope of provision will be determined as part of operational mobilisation and kept under review. It is intended to minimise any disruption on services available to the community.
- The local police force. Policing consideration will be assessed through engagement with the local police force. Respecting the operational independence of the police, measures will be considered to minimise any impact on the local police force.

Service Provision

The Statement of Requirements for the Asylum Accommodation and Support Contracts¹⁷ will be utilised to define services for users. This includes the following responsibilities:

- The contractor (the "Provider") shall signpost to asylum seekers the ways and means for them to provide feedback or make a complaint.
- The Provider's responsibility to proactively monitor and identify residents within their care with specific needs or who may be at risk, and to accordingly notify the Home Office.
- Ensuring all staff have sufficient degree of safeguarding training and clarity on procedures for managing and escalating wellbeing needs for residents.

¹⁷ [AASC - Schedule 2 - Statement of Requirements.pdf](#)

- The Provider's compliance with statutory requirements safeguarding the health and safety of residents, dependent children, visitors, and staff, including Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).
- Evacuation routes and processes in case of emergency and fire, determined by the Provider and which must be approved by the Home Office.
- That the Provider shall provide the appropriate authority with a Health and Safety Plan which shall be reviewed as often as appropriate, but at least annually.

Community Relations

Upon arrival at the Site, it is expected that each asylum seeker will receive a briefing and orientation about the Site and the local community.

The induction briefing explains what:

- constitutes appropriate behaviour and expectations,
- are acceptable and unacceptable/anti-social behaviours
- their responsibilities, as individuals, are to act as in a considerate and respectful way and be a good neighbour when on or off site.

All asylum seekers also receive and must sign a written Occupancy Agreement.

Bicester will not be a detained site and asylum seekers are able to leave it at any time. If they choose to, asylum seekers will be free to interact with the local community and pass close to local amenities nearby, for example recreational centres and open public spaces.

Shuttle buses from the Site to nearby urban centres may be considered to enable the residents to utilise community facilities such as libraries, shops and public spaces.

Asylum seekers accommodated at the Site will be provided with three meals (that meet known religious or cultural requirements) per day which also meet the NHS Eatwell guidelines.

Onsite recreational facilities will be provided.

The Home Office and Service Provider may engage with Voluntary and Community Sector (VCS) organisations about the provision of organised activities for service users.

As noted, the Site will have dedicated multi-faith facilities available 24/7. The provision of these services and facilities onsite will minimise the impact on local communities as the asylum seekers will not need to leave the Site to access these types of facilities.

The Site may generate anxiety amongst local residents, for instance, relating to social cohesion and fear of crime. To help mitigate anxieties and potential

negative perceptions, non-statutory engagement may be undertaken. To mitigate the impact of this, a factsheet will be provided on the Home Office website, and proportionate engagement will be held with local stakeholders (e.g. via Multi-Agency Forums, MPs).

The Home Office is committed to engaging with local and national health providers over the provision of health services associated with the site to help to reduce demand on existing local services. Onsite welfare support activities and services will also be provided to promote the physical and mental wellbeing of service users. These arrangements aim to reduce the potential for healthcare access-related tension between the local community and asylum seekers.

The Home Office acknowledges that the use of the Site in an area which may not previously have accommodated large numbers of single adult male asylum seekers may have an actual or perceived impact on community relations. The Home Office is alert to, and will manage, such impacts in partnership with the Police, Local Authorities, elected representatives, and other stakeholders.

Drawing on practice for other sites, the Home Office will establish a Multi-Agency Forum (MAF) which will bring together, on a regular basis, statutory and other agencies.

Through engaging and working with local police liaison and commanders, local councils and a private sector security provider, the Home Office will seek to prevent anti-social behaviour as well as address it if it occurs.

Local Services (health/emergency services/local council)

In relation to accommodating asylum seekers at this Site, the Home Office has considered the impact on the community, including “blue light” services. The equality impacts on the community continue to be re-assessed for the duration that the Site is operational.

All asylum seekers are eligible for free NHS healthcare in the same way as UK citizens and other permanent residents. The provision of space for primary healthcare on the Site is integral to maintaining the health and wellbeing of asylum seekers, and to avoid increasing the burden on local primary healthcare providers and local community accessing primary healthcare. Onsite primary healthcare has the added benefit of reducing potential tension between the local community towards asylum seekers, who may otherwise perceive asylum seekers competing with, and thereby, reducing the availability and access to community-based GPs and primary healthcare provision. The exact provision for this Site is subject to discussion with the local health authorities.

The Home Office provides an Asylum Grant for Local Authorities under which an initial single payment of £1,200 will be made for bedspaces in Dispersal Accommodation (DA), Overflow Dispersal Accommodation (ODA), Initial Accommodation (IA), and Contingency Accommodation (CA) occupied on 30 March 2026, and ongoing quarterly payments for additional bedspaces calculated monthly between the 01 April 2026 and 31 March 2027 at £100 for occupied bedspaces within DA, ODA, IA, or CA over the 30 March 2026

baseline. More information is provided at Funding Instruction for Local Authorities: Asylum¹⁸. Funding can be spent during the period the site is operational to enable social cohesion and support local provisions linked to the site.

Protests

The Home Office recognises the decision to consider Bicester for asylum accommodation could lead to protests, and that these may continue through the life of the site. There is potential for protests externally from four key groups:

1. Local residents and politicians who object to the usage of the site for accommodation of asylum seekers.
2. Pro-immigration groups who have concerns about the perceived conditions on the site, or that the site is being operated as a detention centre.
3. Anti-immigration groups objecting to the housing of asylum seekers or their arrival in the UK.
4. Individuals/groups who may view/use the site as a focal point for demonstrations/protests in support/against events occurring outside the UK and/or in relation to UK Foreign Policy

The Home Office will work with the police and local community to monitor the situation and minimise potential disruption for those working on or visiting the site, as well as the asylum seekers accommodated on the site.

The wider equalities impact on the community will be re-assessed as the site is scaled up as it is recognised the potential for impact on local services could increase as the number of asylum seekers on the site increases to its capacity.

Policing

Policing operations are a matter for the police force. However, the safety and security of the sites, the asylum seekers and local communities are of the utmost importance. We aim to make the sites as self-sufficient as possible, thus minimising the impact on local communities and services. Measures may include, but are not limited to:

- On-site security provision, with security staff always on-site and on duty (24/7/365), including a continuously staffed reception area. The Service provider will determine the exact number of security staff needed.
- Internal and external patrols to ensure safety and to prevent unauthorised access to contracted location.
- The service provider managing a booking and sign in process for visitors with no overnight visitors allowed.

¹⁸ [Funding Instruction for Local Authorities: Asylum grant](#)

- The service provider carrying out security assessments prior to site opening and being responsible for developing security management plan.
- Adhering to the Supplier Staff Conduct as articulated in AASC contracts and all Supplier Staff delivering the security Services shall have SIA licence accreditation and enhanced DBS checks.
- Incident reporting and contacting the authorities when unacceptable behaviour occurs on site.
- Windows, locks, doors and entry controls, CCTV, and accommodation owned or used by the service provider in connection with the provision of the services all meet appropriate security standards.
- Monitoring of and responding to the alarms on MOD retained assets.
- A documented terror evacuation plan.

Through working closely in cooperation with local liaison and commanders, and local councils the Home Office will seek to address anti-social behaviour, committed by asylum seekers or by members of the public, where and when it may occur.

We recognise that the nature of the site may place additional demands on the police forces concerned. This may justify additional funding. The Home Office has established a policy and process to handle such requests²¹.

Transport

When the Site becomes operational the transport provision will be routinely discussed with the local highways authority and other local stakeholders. The provision may include:

- Transporting asylum seekers to/from the Site when they first move onto and when they depart.
- Transport for service users off site to urban areas or appointments.

Section 5: Ongoing compliance with the PSED

In light of the overall policy objective, there is a responsibility to avoid or mitigate any of the negative impacts identified above.

As set out above, there are no noted significant negative impacts or disadvantages for protected groups (within the wider group of single adult males) arising from accommodating them on the Site, as opposed to accommodating them somewhere else. Service provision on the Site will not be materially different to the provision in other asylum accommodation sites, including hotels, provided elsewhere in the accommodation estate.

The Home Office will ensure there is an on-going focus on the wellbeing of individuals after they arrive at the Site and that any emerging risks are identified through the service provider:

- monitoring and engaging with the Site's residents to understand and act on their concerns and
- close liaison with local health professionals and voluntary sector groups.

The support arrangements will be similar to the arrangements in other parts of the asylum accommodation estate and those accommodated at this Site will receive the same level of support to meet their essential living needs as those accommodated elsewhere.

As detailed above, clear criteria are in place as set out in the Allocation of Asylum Accommodation Policy to identify those whose personal circumstances mean they are/may be unsuitable to be accommodated at this Site.

As the site opens, engagement with key stakeholders (local authorities, health, police, etc.) is expected to continue and to be led by the South-East of England Strategic Migration Partnership, contracted by the Home Office. Such engagement will aim to empower partners, who are trusted by the local community, to continue fostering good community relations. This may involve contextualising the issue of the use of the Site, against the Home Office's wider legal duties, powers and aims to:

- provide accommodation to asylum seekers who require it
- reform the asylum system and reduce the intake of arrivals.

The Service Provider may establish direct communication channels to improve communications and relationship between the Site and immediate local residents so issues of concern can be raised and addressed.

The Home Office is focused on maintaining an effective working relationship with the local police force and local authorities.

Whilst the Site is operational the Home Office will continue to explore any further actions to mitigate demand placed upon local services.

This Equality Impact Assessment is a living document and will be kept under review as the operation develops. Engagement will continue through delivery of the site by the programme and when it transfers to operations.

The Home Office will continue to explore if there are further measures which can be put in place to mitigate demand placed upon local services.

Section 6: Section 55 duty (for immigration, asylum, and nationality considerations only)

The need to safeguard and promote the welfare of children in the UK has been considered. We consider that it would be contrary to the relevant duty in section 55 of the Borders, Citizenship and Immigration Act 2009 to accommodate children at the site given the configuration of the accommodation, noting the local authority's responsibility for UASCs, and the fact that provision can and

will be made elsewhere to meet the Home Secretary's statutory obligations towards asylum seekers including children in family groups.

Section 7: Risks to vulnerable individuals and other groups

Individuals identified as vulnerable through screening, welfare engagement or safeguarding processes will be managed in line with established Home Office procedures. Where a person's needs cannot be met at Bicester, they will be relocated to alternative accommodation within the asylum estate. The operation of the site will be kept under review to ensure risks to vulnerable individuals are identified and mitigated appropriately.

Section 8: Declaration and sign-off

I have read the available evidence, and I am satisfied that this demonstrates compliance, where relevant, with section 149 of the Equality Act 2010 and that due regard has been had to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations.

This EIA will be reviewed on: **six months from date given below or earlier where necessary, if material changes arise**

SCS Name & Title [REDACTED]

Directorate/Unit: Asylum Accommodation Programme

Lead contact: [REDACTED]

Date: 28 May 2026

Section 9: EIA Monitoring, Clearance and Publication

**The section below must be completed.
It contains sensitive information and is for internal use only.
This section should not be published.
Please redact the section below if you intend to publish your EIA outside of the Department.**

For monitoring purposes all completed EIA documents and updated EIAs must be sent to the PSED Team at [REDACTED]

Date sent to PSED Team: 28/05/2026

Please check the boxes that apply below:

Is this a new or updated EIA?

☒ New EIA ☐ Updated EIA

Insert the link to the previous EIA if relevant:

Legal Clearance:

☒ The EIA has been cleared by your HOLA lawyer.

Provide email / name of your HOLA lead:

[REDACTED]

Publication of the EIA: [Not decided yet]

☐ Select if the SCS of the policy/operational area has consented to publish the EIA on www.gov.uk

If published, ensure you share the link with the PSED team at PSED@homeoffice.gov.uk

☐ Select if the SCS of the policy/operational area has consented for the EIA to be published internally on Home Office SharePoint [PSED Group Channel Home page?](#)