



Equality Impact Assessment [EIA]

Section 1: Crowborough Site

This EIA considers the equality implications of the operational asylum accommodation site at Crowborough Training Camp, East Sussex, which forms part of the Home Office's Non-Detained Accommodation Estate under the Asylum Accommodation Programme (AAP).

Asylum Accommodation

The table below shows the number of people included in UK asylum applications for each calendar year since 2020¹:

People included in UK asylum applications 2020 to June 2026							
Year	2020	2021	2022	2023	2024	2025	2026 (Jun)
Total	37,603	57,942	95,007	87,427	104,764	101,911	85,891

The rise in asylum applications has increased the number of non-detained asylum seekers who require accommodation.

The Immigration and Asylum Act 1999 confers on the Home Office a legal power to support asylum seekers and their dependants who would otherwise be destitute.

Section 97 of the 1999 Act requires caseworkers, when exercising the power to provide accommodation, to consider the general desirability of using areas where accommodation is readily available. They must not take account of an individual's preferences. Accommodation is therefore allocated on a no-choice basis in any part of the UK where the Home Office has suitable provision.

Section 4 support may also be available to failed asylum seekers, including those whose claims have been declared inadmissible or refused. The Secretary of State may use the same power to provide accommodation where a person meets at least one of the five conditions in the Immigration and Asylum (Provision of Accommodation to Failed Asylum Seekers) Regulations 2005. Broadly, these conditions concern a practical or legal barrier preventing the person from leaving the UK.

Hotels as Contingency Accommodation

The Government has relied on hotels as contingency accommodation to meet high demand. It has committed to ending the use of asylum hotels during this Parliament.

¹ [Immigration system statistics data tables - GOV.UK](https://www.gov.uk/government/statistics/immigration-system-statistics-data-tables)

Hotels were intended as a short-term measure and are not sustainable in the longer term. Their use may strain relations with local authorities and communities, become a focus for protests, and cost more than other forms of accommodation.

Other options, including the private rented sector, present similar risks. The Home Office may also compete for properties with people who have UK residency rights, potentially reducing supply and increasing rents. These pressures could significantly affect its ability to secure accommodation and meet its statutory duties.

The Government established an Asylum Accommodation Taskforce to coordinate the delivery of alternative accommodation across government. It has considered a range of more suitable options, including large former military sites, to reduce the impact on communities.

When well-managed, collective accommodation, including large sites, can support more efficient case processing and reduce pressure on local services by providing services on site.

Crowborough Site: Use as asylum accommodation - operational context

Crowborough Training Camp, also known as Beacon Camp, is a Ministry of Defence (MOD) facility in East Sussex, in the South-East of England. It is approximately 2.5 km from Crowborough town centre, within the wider protected area of Ashdown Forest.

Key local partners include Wealden District Council, Sussex Police, NHS Sussex Integrated Care Board and the South-East Strategic Migration Partnership. Engagement also involves councils at county, district, town and parish levels, local highways stakeholders, the site service provider and voluntary and community organisations.

The training camp covers 19.68 hectares and contains accommodation, administration and support buildings, alongside military training facilities.

Accommodation is provided in pre-built ex-military buildings. One accommodation building provides rooms shared by up to two residents; the other accommodation buildings provide dormitory-style rooms shared by up to 16 residents.

In October 2025, the Home Office reached an agreement with the Ministry of Defence to use Crowborough Training Camp for asylum accommodation. Operations commenced in January 2026.

The Home Office initially obtained temporary planning permission through the Crown emergency development rights under Class Q of Part 19, Schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015. The current Class Q permission remains in place until January 2027.

In June 2026, the Home Office confirmed that the Ministry of Defence had offered continued availability of the site until January 2030, subject to the necessary planning permissions, approvals and assessments. No final decision to continue operation until January 2030 will be taken until these have been obtained and actively considered.

Facilities, services and amenities – The site provides indoor and outdoor sport and recreation, education, faith and prayer, and dining spaces, together with laundry facilities and free Wi-Fi for residents with smartphones. These on-site services reduce the need for asylum seekers to leave the site.

On-site healthcare comprises a GP-led primary care service coordinated with NHS Sussex, operating on weekdays from 09:00 to 19:00. An initial health assessment is offered to all new arrivals, with the aim of completing it on the day of arrival. A remote on-call GP service is available at weekends from 08:00 to 20:00. The site maintains 14 dedicated isolation bedspaces, and the healthcare provider arranges prescriptions through local pharmacies for residents to collect. On-site Welfare Officers also provide welfare support.

Asylum seekers without their own mobile phone may request access to a mobile telephone on site to maintain contact with others, particularly their legal representatives and Migrant Help.

Capacity

The site provides 540 bedspaces. Under normal operations, the inflow of new residents is limited to a maximum of 60 individuals per week.

The Home Office intends to seek planning permission to operate Crowborough as temporary asylum accommodation until January 2030. The proposal remains subject to the necessary planning consents, approvals and assessments; the availability of the MOD site does not itself constitute planning approval.

With such a large-scale operation, there will be potential impacts on the delivery of welfare provision, safeguarding, healthcare access, reasonable adjustments, privacy in communal accommodation, faith provision, and the management of tensions between groups. From the findings set out below, there are no material equality changes in relations to the protected characteristics assessed.

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

Accommodation decisions are based on individual need. Children under 18 are not accommodated at Crowborough because local authorities are responsible for unaccompanied asylum-seeking children, while families are housed in dedicated family accommodation elsewhere. These arrangements support safeguarding and reflect the predominantly adult profile of applicants requiring accommodation.

The **latest** quarterly asylum statistics² show that applicants aged 18 to 49 consistently form the majority:

Asylum Applications (Main and dependent) by age per quarter)								
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

Applicants aged 70 or over form a small minority and may have support or accessibility needs that Crowborough cannot meet. Those over the age of 65 are more likely to have a vulnerability or health condition, as such accommodating this age group at certain sites would potentially place an increased burden on the onsite and/or local healthcare providers. Where age exceeds 65 the person will be placed in alternative Home Office accommodation.

Therefore, as those under 18 and over 65 are precluded from staying in Crowborough, the site does give rise to direct discrimination on these grounds

As currently assessed, Crowborough's operation constitutes direct age discrimination.

However, section 13(2) of the Equality Act 2010 permits this treatment where it is a proportionate means of achieving a legitimate aim. Here, the aim is to fulfil legal obligations relating to accommodation safely and appropriately by matching individuals to provision suitable for their assessed needs.

Schedule 18 to the Equality Act 2010 also provides limited exceptions for immigration and nationality functions. Section 149(1)(b), concerning the advancement of equality of opportunity, does not apply to age, race other than colour, or religion or belief in this context.

Sex

² [Immigration system statistics data tables - GOV.UK](https://www.gov.uk/government/statistics/immigration-system-statistics-data-tables)

Accommodation decisions are based on need, irrespective of sex. However, Crowborough will accommodate only single adult men, which may amount to less favourable treatment for people included in or excluded from the site. Women with equivalent accommodation and support needs will be placed in suitable provision elsewhere.

Crowborough is therefore assessed as directly discriminatory on grounds of sex. However, this treatment is lawful under Schedule 23(3) to the Equality Act 2010, which permits sex-based provision 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.”

In considering paragraph 3(3) and Schedule 23, regard has been given to whether it would be reasonable to alter or extend the accommodation or provide further accommodation, and to the relative demand from each sex. Although a mixed site with separate accommodation for women and men would be possible in principle, demand and operational factors must also be considered.

Historically and currently, men substantially outnumber women among asylum applicants. Men of all ages consistently account for 70% to 80% of adult applications, creating a greater and more immediate need for accommodation suitable for men.

The possible application of Schedule 3, paragraph 27, has also been considered:

*“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

(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.

For condition 4, the data show that asylum claims are predominantly made by men:

Applications by Gender (Aged 18+) ³ 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

Crowborough does not currently have suitable facilities for children, and many women seeking asylum are accompanied by children. Accommodating families there would therefore be inappropriate. Adult women, and all applicants under 18, whether unaccompanied or in a family group, will be provided with suitable accommodation elsewhere.

For paragraph 27(b), limiting provision to men is considered a proportionate means of achieving the Secretary of State's legitimate aim of meeting statutory accommodation duties safely and matching individuals to accommodation suitable for their assessed needs.

Schedule 3, paragraph 27, condition 5 may also apply because the service is provided at an establishment for people requiring special care, supervision or attention.

As currently assessed, Crowborough's operation constitutes direct sex discrimination.

However, Schedule 23(3) to the Equality Act 2010 permits this treatment in relation to communal accommodation where it is a proportionate means of achieving a legitimate aim.

Without prejudice to that conclusion, Schedule 3, paragraph 27, may also permit the provision of services to one sex where the specified conditions are

³ [Immigration system statistics data tables - GOV.UK](https://www.gov.uk/government/statistics/immigration-system-statistics-data-tables)

met and the arrangement is a proportionate means of achieving a legitimate aim.

Marriage & Civil Partnership

Marriage and civil partnership are not protected characteristics for the purposes of Part 3 of the Equality Act 2010, which governs services and public functions, including asylum accommodation. However, the section 149 duty to have due regard to eliminating unlawful discrimination still applies.

A person's marital or civil partnership status does not affect accommodation decisions. However, as Crowborough accommodates single adult men, couples who claimed asylum together will be housed together elsewhere in the asylum accommodation estate.

In case where a partner of a man accommodated at Crowborough is later identified as having claimed asylum in the UK, the Change of Circumstances process may be used to move both partners to suitable accommodation elsewhere, provided they both wish to live together.

As currently assessed, Crowborough is not directly discriminatory on grounds of marriage or civil partnership, because people who are married or in civil partnerships are not treated less favourably than others.

Other protected characteristics

Direct discrimination has also been considered for the following protected characteristics. **As currently assessed, Crowborough is not directly discriminatory in relation to any of them:**

Disability

Asylum seekers whose accommodation-related care needs arise from factors other than destitution are supported by local authorities under the Care Act 2014, the Children Act 1989, or equivalent legislation in Scotland, Wales and Northern Ireland, following an appropriate local authority assessment.

People with less severe disabilities may qualify for Home Office support under the 1999 Act but, depending on their individual needs, may be unsuitable for Crowborough under the suitability policy. The site and rooms are not adapted for some accessibility needs, which could prevent full use of its facilities and amenities.

The Equality Act also requires reasonable adjustments where a disability places an asylum seeker at a substantial disadvantage compared with a person who is not disabled.

Needs will be assessed individually, and reasonable adjustments will be made where they can be delivered within the site's accommodation and support arrangements.

Needs that cannot be met are generally identified through normal asylum casework, particularly the initial screening interview and the ASF1 asylum-support application.

Suitability will also be monitored after arrival so that emerging risks to a resident's wellbeing can be identified.

If a resident's needs cannot be met at Crowborough, the Home Office will be notified and the person moved to alternative accommodation. This is relevant where the identified vulnerability may amount to a disability for equality purposes.

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

Gender Reassignment

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

Accommodation for people who are undergoing or have completed gender reassignment is considered case by case. Where gender reassignment gives rise to safeguarding concerns, the person will be moved to suitable alternative accommodation where appropriate.

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

Pregnancy and maternity

Crowborough is not intended to accommodate women. The Home Office does not hold pregnancy or maternity information 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.

Women, pregnant asylum seekers and people with children will be accommodated elsewhere in the asylum estate. Pregnancy and maternity do not otherwise arise under this proposal because Crowborough is currently intended only for men.

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

Race

Published Home Office statistics⁴ show that asylum applicants come from many nationalities, although recent applications have been concentrated among several 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%

Regardless of race or nationality, accommodation decisions are made individually under the Allocation of Asylum Accommodation policy and the Asylum Accommodation and Support Contracts Statement of Requirements.

Because Crowborough accommodates people from a range of countries and backgrounds, it is not considered directly discriminatory on grounds of race, whether in relation to residents or applicants accommodated elsewhere.

Anyone unsuitable for Crowborough will be offered suitable accommodation elsewhere in the existing estate.

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

Religion or Belief

The Home Office does not collect data on the religious beliefs of asylum-support applicants. Based on the nationalities most commonly receiving support, a significant proportion are likely to identify as Christian or Muslim, although the extent of religious observance is unknown.

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

Accommodation decisions are based on individual need, regardless of religion or belief. Destitution is assessed by reference to the available facts and evidence.

Residents receive meals on site, with catering designed to meet dietary, cultural and religious requirements and supported by existing welfare and safeguarding arrangements.

Dedicated multi-faith facilities are available at all times, enabling residents to practise their religion or belief under Article 9 without relying on travel into the local area. As the site is non-detained, residents may also freely attend local places of worship.

Multi-faith facilities help meet residents' diverse cultural, religious and spiritual needs so far as practicable. Any tensions between denominations or faith groups are managed under established site policies and operational procedures.

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

Sexual Orientation

Accommodation decisions are based on individual need, regardless of sexual orientation. Destitution is assessed by reference to the available facts and evidence.

Since 2018, the Home Office has published statistics on asylum claims in which sexual orientation formed part of the claim. Sexual orientation remains a protected characteristic whether or not it is relied on in an individual claim.

In 2023, sexual orientation formed part of the basis of 2% of UK asylum claims, equivalent to 1,377 claims. For most nationalities, these claims represented a small proportion of all applications. Applicants are not required to disclose their sexual orientation, so the statistics record the basis on which claims were made rather than confirming applicants' sexual orientation.

There is no evidence that sexual orientation creates materially different support needs. However, some residents may face prejudice, harassment or bullying. Such concerns are managed individually under established procedures, and a resident will be moved if their welfare is, or may be, compromised.

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

Section 2b: Indirect Discrimination

Consideration has been given to any potential indirect disadvantages arising from the site's operation, such as the provision of communal accommodation and accessibility limitations arising from the site's rural location and reliance on

bespoke transport for service users to access the local towns. Whilst protected characteristics of the service users are disclosed only after arrival, mitigations are in place including individual screening, ongoing welfare monitoring, safeguarding referrals and relocation where needs cannot be met. These measures are intended, so far as possible, to address adverse effects on people with protected characteristics.

Age

As explained above, restricting Crowborough to people aged 18 to 65 amounts to direct age discrimination but is considered objectively justified as a proportionate means of achieving a legitimate aim.

No indirect age discrimination has been identified. The Site's operation remains under review, and this assessment will be updated where necessary.

Sex

Female asylum seekers will not be accommodated at the site but will be accommodated elsewhere in the asylum accommodation estate.

The operation, as currently assessed, at Crowborough is not considered to be indirectly discriminatory in relation to sex.

Disability

The proposed operation of the Site, as currently assessed, at Crowborough is not considered to be indirectly discriminatory in relation to disability. We continue to assess physical and mental disabilities on a case-by-case basis and reasonable adjustments applied where necessary. However, the operation of the Site is kept under review, and this assessment will be updated as necessary.

Gender Reassignment

Accommodation for people who are undergoing or have completed gender reassignment is considered case by case. **The current operation, as currently assessed, at Crowborough is not considered to be indirectly discriminatory in relation to Gender Reassignment.** While no evidence has been recorded, there may be instances where residents who share communal facilities could face hostile or abusive behaviour from others because of gender reassignment. As such, 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 Crowborough is not considered to be indirectly discriminatory in relation to sexual orientation. Whilst we don't collect evidence concerning service users' sexual orientations, residents who share communal facilities may nevertheless face hostile or abusive behaviour from others because of their sexual orientation. If concerns arise these are managed individually under established procedures, and a resident will be moved if their welfare is, or may be, compromised. Additionally, 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.

As such, the operation, as currently assessed, at Crowborough is not considered to be indirectly discriminatory in relation to pregnancy and maternity because the site is intended for men.

Race

The operation, as currently assessed, at Crowborough 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 on the religious beliefs of asylum-support applicants. Based on the nationalities most commonly receiving support, a significant proportion are likely to identify as Christian or Muslim, although the extent of observance is unknown.

Residents will receive meals on site, with catering arrangements reflecting dietary, cultural and religious needs. Any concerns about food provision are addressed through established welfare and safeguarding processes.

Religious provision reflects residents' diverse cultural and faith backgrounds and meets spiritual needs so far as practicable. Potential tensions, including between Sunni and Shia Muslim residents, are managed under established policies and operational practice across the estate.

As the site is non-detained, asylum seekers are free to access local religious services and amenities where they may express and practise their religion or belief. They are offered transportation to nearby towns.

The operation, as currently assessed, at Crowborough 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

Paragraph 2 of Schedule 18 to the Equality Act 2010 exempts the Home Office, when exercising immigration and nationality functions, from the section 149(1)(b) duty to advance equality of opportunity between people who share a protected characteristic and those who do not.

The exemption applies to age, religion or belief, and race where race concerns nationality, ethnicity or national origin; it does not apply to colour.

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

- disability
- gender reassignment
- pregnancy and maternity
- sex
- sexual orientation
- race

For the protected characteristics to which section 149(1)(b) applies, the Home Office has considered the need to advance equality of opportunity between those who share the characteristic and those who do not.

The Crowborough Site does not change the support available to asylum seekers under sections 95 or 98 of the Immigration and Asylum Act 1999.

In relation to the Crowborough Site, the Home Office considered equality of opportunity between residents at the site and asylum seekers accommodated elsewhere.

Residents receive the same or equivalent support as asylum seekers housed elsewhere and participate in public life.

There is no evidence that housing single adult men at Crowborough or a similar site, rather than in a hotel or other facility, reduces the quality of support or hinder 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 requires due regard to fostering good relations between people with different protected characteristics. The Equality Act specifies that this includes:

- tackling prejudice
- promoting understanding

Stakeholder Engagement

Engagement with local partners includes Wealden District Council, Sussex Police, NHS Sussex Integrated Care Board, local councils, elected representatives, the site service provider and voluntary and community organisations. Engagement continues throughout operation and, as appropriate, decommissioning. The site aims to be as self-sufficient as possible to limit disruption to local communities.

Free travel is currently offered to Crawley, where contingency accommodation is already provided. The wider area, within approximately 45 km of Crowborough, includes dispersed accommodation and a small number of contingency hotels. Engagement considers effects on this wider area and will continue as proposals for operation until January 2030 develop.

Various stakeholders are engaged to support this limb, including:

- NHS Sussex Integrated Care Board and primary healthcare partners coordinate on-site healthcare provision and keep arrangements under review to minimise pressure on services available to the local community.
- Sussex Police. Policing requirements are assessed through continuing engagement with Sussex Police, which retains operational independence in determining the appropriate structure and level of police resourcing.

Service Provision

Services are defined by the Asylum Accommodation and Support Contracts Statement of Requirements, including 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.
 - The Provider’s compliance with statutory requirements safeguarding the health and safety of residents, dependent children, visitors, and staff,
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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

On arrival, each resident is expected to receive an induction covering the site and local community. The induction briefing explains what:

- constitutes appropriate behaviour and expectations,
- are acceptable and unacceptable/anti-social behaviours
- their responsibilities, as individuals, 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.

Crowborough is non-detained, does not operate a curfew, and residents may enter or leave at any time. They may interact with the local community and use nearby public amenities, including recreation facilities and open spaces.

Free scheduled return transport operates every day to enable access to urban centres and public amenities. Free travel is currently offered to Crawley. Demand-led transport, excluding taxis wherever possible, is also provided for off-site legal and medical appointments where public transport is not appropriate or available.

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

On-site recreation includes communal areas, a fitness centre or gymnasium, space for pool, snooker and table tennis, and grassed outdoor areas that can be used for sports such as football.

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

As noted, the Site has dedicated multi-faith facilities available 24/7. The provision of these services and facilities onsite minimises 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 cause concern among local residents, including about community cohesion or crime. Provision of policing is set out below. On community cohesion, working with local police liaison officers, commanders, councils and the private security provider, the Home Office seeks to prevent and address criminality including antisocial behaviour.

The service provider, local council, police representative and Home Office officials engage regularly to discuss issues affecting the site which could damage community cohesion. The associated policing generally falls into three categories:

- a. policing the site and its residents through arrangements determined by Sussex Police;
- b. policing protest activity around the site, including routine wraparound policing for recurring protests, whose scale can be unpredictable which is addressed below; and
- c. policing support for local communities, including a visible presence to address and deter antisocial and criminal behaviour, with resourcing determined by Sussex Police.

The Home Office publishes factsheets and engages with Wealden District Council and other stakeholders through the Multi-Agency Forum, its subgroups and elected representatives to address concerns and provide information about the site's operation.

The Home Office work with local and national health providers on services associated with the site to reduce demand on existing local provision. On-site welfare support promotes residents' physical and mental wellbeing and help reduce tensions linked to perceived competition for healthcare.

The Home Office recognises that accommodating a large number of single adult male asylum seekers in an area without comparable previous provision may affect, or be perceived to affect, community relations. These impacts are managed with the police, local authorities, elected representatives and other stakeholders.

The Home Office has established a monthly Multi-Agency Forum bringing together statutory bodies and other relevant organisations. It is facilitated and chaired by the South-East Strategic Migration Partnership, with subgroups addressing operational matters and community cohesion.

Local Services (health/emergency services/local council)

The Home Office has considered the effect of the Site on the local community, including emergency services. Equality impacts will continue to be assessed throughout the site's operation.

Asylum seekers are entitled to free NHS healthcare on the same basis as UK citizens and permanent residents. Providing primary healthcare space on site is important to residents' wellbeing and should reduce pressure on local services and concerns about competition for GP appointments.

The Home Office provides Wealden District Council with £1,200 per occupied bed at Crowborough, in line with the published funding instructions for dispersal accommodation. This funding may be used during the site's operation to support social cohesion and local provision linked to the site.

Protests

The Home Office recognises that using Crowborough for asylum accommodation may prompt protests throughout the site's operation. Four broad groups may protest externally:

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 works with the police and local community to monitor protests and minimise disruption to residents, staff and visitors. Also, the community equality impacts are reassessed as occupancy increases, because pressure on local services may grow as the site approaches capacity.

Policing

Operational policing remains a matter for Sussex Police, which determines the appropriate structure and level of resourcing. The Home Office has awarded Sussex Police a grant to support policing associated with Crowborough. Requirements remain under review through engagement and the Multi-Agency Forum subgroups. Measures to minimise pressure on local policing include:

- 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/out process for visitors with no overnight visitors allowed.
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- 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.

The Home Office works with Sussex Police liaison officers and commanders, Wealden District Council and other local councils to address antisocial behaviour by residents or members of the public whenever it occurs. Policing requirements and the measures intended to minimise pressure on Sussex Police remain under review throughout the site's operation.

Transport

Transport arrangements are reviewed regularly with local highways stakeholders and other partners. Scheduled services provide access to urban centres within approximately 45 km of the site, with free travel currently offered to Crawley. Frequency and capacity are assessed and adjusted to demand. Provision includes:

- Transporting asylum seekers to/from the Site when they first move onto and when they depart.
- Free scheduled return transport to nearby urban centres seven days a week, together with demand-led transport, excluding taxis wherever possible, for off-site legal and medical appointments where public transport is not appropriate or available.

Section 5: Ongoing compliance with the PSED

The Home Office must avoid or mitigate any adverse effects identified in pursuing the overall policy objective.

Overleaf is a table of summary findings of the broader equality assessment.

OFFICIAL SENSITIVE

<i>Potential impact</i>	<i>Evidence</i>	<i>Mitigation</i>	<i>Residual risk</i>	<i>Monitoring</i>
<i>Placement may not meet some residents' health, disability, accessibility or safeguarding needs.</i>	Crowborough accommodates single adult men aged 18–65 and is not suitable for every accessibility, physical-health or mental-health need.	Screen residents individually, make reasonable adjustments where practicable, monitor suitability after arrival and move residents whose needs cannot be met.	Some needs may emerge or be disclosed only after arrival.	Review welfare reports, healthcare input, safeguarding cases, reasonable adjustments and transfers.
<i>Residents may face harassment or bullying because of a protected characteristic.</i>	Communal living and shared sleeping arrangements may lead to isolated hostile, abusive or discriminatory behaviour.	Use induction, trained staff, incident reporting, security, welfare support, safeguarding procedures and relocation where needed.	Incidents may still occur or may not be reported promptly.	Track complaints, incidents, safeguarding referrals, resident feedback and emerging trends.
<i>Religious, cultural or dietary needs may not always be met.</i>	Residents have varied backgrounds and complete information about religion or belief is not routinely collected.	Provide culturally and religiously appropriate meals, 24/7 multi-faith facilities, access to local worship and established complaints routes.	Not every preference can be met and tensions between groups may arise.	Review catering feedback, complaints, use of faith facilities and reported tensions.
<i>Occupancy may increase pressure on local services.</i>	Up to 540 residents may create additional demand for healthcare, policing, transport and other local provision.	Provide on-site primary healthcare, welfare and recreation; scheduled and demand-led transport; and work with Wealden District Council, Sussex Police, NHS Sussex and other partners.	Demand may rise during occupancy changes, incidents or protests.	Track occupancy, service use, transport demand, policing impacts and stakeholder concerns.

OFFICIAL SENSITIVE

<i>Protests, misinformation and community concerns may harm relations.</i>	The use of Crowborough for asylum accommodation has prompted protests, correspondence and local concerns about behaviour, safety and public services.	Use the Multi-Agency Forum and subgroups, factsheets, direct resident-contact routes, police liaison and continuing community engagement.	Public opinion and protest activity can change quickly.	Monitor protests, complaints, antisocial behaviour, community correspondence and stakeholder feedback.
<i>Operational or planning changes may create new equality impacts.</i>	Occupancy, transport, service arrangements and the proposed operation to January 2030 may change over time.	Maintain oversight, stakeholder engagement and clear escalation routes, and review mitigations after material changes or significant incidents.	New impacts may arise between formal reviews.	Review at least every six months and earlier after material changes, significant incidents or new evidence.

The above findings indicate no significant adverse effects or disadvantages have been identified for protected groups within the wider cohort of single adult men as a result of placement at the Crowborough Site rather than elsewhere. Support at the site is materially equivalent to that provided across the wider asylum accommodation estate, including in hotels.

The Home Office will maintain an ongoing focus on residents' wellbeing and ensure that the service provider identifies emerging risks by:

- monitoring and engaging with residents to understand and address their concerns; and
- maintaining close liaison with local health professionals and voluntary-sector organisations.

Support arrangements will be consistent with those elsewhere in the asylum accommodation estate. Residents at Crowborough will receive the same level of support for their essential living needs as people accommodated in other locations.

The Allocation of Asylum Accommodation Policy sets clear criteria for identifying people whose personal circumstances make, or may make, Crowborough unsuitable for them.

The South-East Strategic Migration Partnership facilitates and chairs Crowborough's monthly Multi-Agency Forum, supporting continuing engagement between the Home Office, local authorities, health bodies, Sussex Police and other key stakeholders. This engagement supports community relations and places the site's operation in the context of the Home Office's wider duties and objectives to:

- provide accommodation for asylum seekers who need it; and
- reform the asylum system and reduce arrivals.

The Home Office Oversight team has established direct communication channels with nearby residents so that concerns can be raised and addressed promptly, helping to strengthen relations between the site and the local community.

The Home Office maintains working relationships with Sussex Police, Wealden District Council, NHS Sussex and other local stakeholders.

While the site remains operational, the Home Office will continue to identify measures to reduce pressure on local services.

This Equality Impact Assessment is a living document and will be reviewed as the operation progresses. Engagement will continue throughout programme delivery and after responsibility transfers to the operational teams.

The Home Office will also continue to consider further measures to mitigate demand on local services where they arise.

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

The duty to safeguard and promote the welfare of children in the UK has been considered. Given the site's configuration, the local authority's responsibility for unaccompanied asylum-seeking children, and the availability of suitable accommodation elsewhere for children in family groups, accommodating children at Crowborough would be inconsistent with section 55 of the Borders, Citizenship and Immigration Act 2009. Alternative provision will enable the Home Secretary to meet the relevant statutory obligations.

Section 7: Risks to vulnerable individuals and other groups

People identified as vulnerable through screening, welfare engagement or safeguarding processes will be managed under established Home Office procedures. If Crowborough cannot meet an individual's needs, they will be moved to suitable alternative accommodation within the asylum estate. The site's operation will remain under review so that risks to vulnerable people and other groups 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: **six months from date given below or earlier where necessary, if material changes arise**

SCS Name & Title: [REDACTED]

Directorate/Unit: [REDACTED] - Crowborough site

Lead contact: [REDACTED] - [REDACTED]

Date: 20/10/2026

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: 21/10/2026

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: n/a

Legal Clearance:

☒ The EIA has been cleared by HOLA lawyer.
Provide email / name of HOLA lead:

[REDACTED] - [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

[REDACTED]

☐ 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?](#)