

Response to Home Office consultation on asylum dispersal

June 2022

The Helen Bamber Foundation (HBF) is a specialist clinical and human rights charity that works with survivors of trafficking, torture and other forms of extreme human cruelty and believes that all survivors should have safety, freedom and power. Our work alongside survivors shows us that with early and appropriate care and support survivors build the strength to move on with their lives (or strength to fly). Our multidisciplinary and clinical team provides a bespoke Model of Integrated Care for survivors which includes medico-legal documentation of physical and psychological injuries, specialist programmes of therapeutic care, a medical advisory service, a counter-trafficking programme, housing and welfare advice, legal protection advice and community integration activities and services.

Q1. Please indicate the type of organisation you represent – NGO

Q2. What is the name of your organisation? Helen Bamber Foundation

Q3. In which region/nation is your local authority/organisation located? London

Q4. Have you previously provided support or services to asylum seekers accommodated through the asylum dispersal process? Yes

Q5. What would you like to be included in a new asylum dispersal system?

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Most of HBF's clients are housed in London. As an urban area, the Home Office has assumed that this means they are close to all the services they need.¹ However, we frequently see clients placed in areas, even within zones 1-6, in which they struggle to access appropriate support such as specialist legal and immigration advice. This is exacerbated by the fact that asylum support rates do not adequately cover the costs of travelling to access services – more information on this is available in our submission to the asylum support rates review undertaken last year²: We would urge the Home Office to consider asylum support rates as part of this work on dispersal to make sure all those seeking asylum are able to access the services they need.

In addition, HBF clinicians have worked with a number of people seeking asylum placed in institutional accommodation in Napier Barracks and the (now closed) Penally Camp. The experiences of those placed in barracks accommodation has highlighted the extent to which the provision of community-based private accommodation with access to the necessary services is essential for the health and well-being of those seeking asylum. We recently responded to the planning consultation on the use of Jaguar Buildings (former RAF housing) in Badersfield, Norfolk as Initial Asylum Accommodation, highlighting concerns about the use of a semi-closed, fenced environment, with limited freedom of movement; shared facilities and lack of privacy; isolation from communities; and the inability of residents to access services, including healthcare and legal advice, and activities as they would in the community.

The plans were then amended to reduce the number of residents and HBF welcomed news that the service provider is “in discussions with the Norfolk CCG and Primary Care Directorship team regarding supplying a small level of in-house health care”, although our concerns remain.³

Based on this experience, we believe it is essential that a new asylum dispersal system provides people seeking asylum with safe, suitable accommodation with the resources to support them. Everyone in asylum dispersal should have access to accommodation in which their privacy and independence can be respected, with no requirement to share a bedroom with an unrelated adult. They should have access to cash financial support and the facilities to cater for themselves. The availability of the following services near to the accommodation must be a key consideration of any new scheme:

- **Access to NHS healthcare** – it is vital that the Home Office works with local health services/Clinical Commissioning Groups to map out local healthcare provision in all

¹ One of the arguments put forward as part of the assessment of asylum support rates is that ‘asylum seekers are invariably accommodated in urban areas’ which infers they will be close to all the services they need – see [Submission to the 2021 Home Office review of asylum support rates | Helen Bamber](#)

² <https://www.helenbamber.org/resources/reportsbriefings/submission-2021-home-office-review-asylum-support-rates>

³ [Response to planning application for initial accommodation centre in Badersfield, Norfolk | Helen Bamber](#)

new and existing dispersal areas and ensure everyone receiving asylum support is supported to register with a GP and dentist, and to access specialist healthcare where needed, in particular trauma-focussed mental health support through the NHS.

- **Access to quality legal advice and representation for their asylum claim, including face to face advice** - when planning dispersal, the Home Office must consider the availability of legal aid advice in the area and work with the Ministry of Justice and Legal Aid Agency to ensure that this work is adequately funded and that, if necessary, matter starts are increased to address demand. A new report from Refugee Action⁴ provides an invaluable overview of current legal aid provision across the country:
- **Access to opportunities to learn English** - the integration process should begin as soon as people seeking asylum arrive in the UK. For those who are recognised as refugees after arriving in the UK, their long-term ability to integrate within their new communities will depend on their experiences throughout the asylum process. Yet, ESOL provision remains inadequate for new arrivals across the UK, with particular gaps in England, meaning many new arrivals often can end up on extensive waiting lists for classes, and other barriers to learning, including childcare provision, remained unaddressed. The ability to acquire English language and other basic skills should be factored into areas for asylum dispersal.
- **Accessible location** - due to the high costs of renting in some areas, dispersal accommodation is often situated in places which are far away from main hubs and city centres. This is not adequately factored into the calculation of asylum support rates and so people often do not have enough money or cannot access it (those on section 4 support) to pay for travel by public transport to attend appointments, do their essential shopping or see a doctor. Inability to travel due to insufficient funds coupled with lack of money to pay for telephone calls hinders their ability to access crucial services and worsens social isolation and mental health problems.
- **Access to other practical and emotional support and advice services** - such as refugee charities, therapeutic support, destitution, rape crisis, HIV and LGBTQ+ support services, and places of worship.

For every dispersal area, there should be proper consultation with communities, that includes not just the local authority but also the local CCG and other health services in the area, voluntary sector agencies, and people with lived experience of the system.

⁴ [No access to justice: how legal advice deserts fail refugees, migrants and our communities - Refugee Action \(refugee-action.org.uk\)](https://refugee-action.org.uk)

In terms of the process of moving people into dispersal accommodation, we would recommend that:

- People seeking asylum should be told what accommodation they are being offered in advance, in a clear offer letter that provides sufficient detail, with the address of the planned accommodation, so that they can safely transition to the new address or explain any concerns they have about the planned move. They should be given sufficient notice of the move (at least 5 days in accordance with current policy) in a clear letter outlining all the relevant information, and never be misled about the location of their new accommodation or left at-risk in the move-in process.
- Information and support provided to the person about their local area – their nearest GP and dental practice, ensuring that households with school-age children are supported to apply for school places as soon as possible, where to go for help, what they can expect in their accommodation, how to complain or raise concerns if needed.
- The new dispersal system should avoid repeated moves across different parts of the UK as this disrupts people's ability to access essential services and make connections. Early and effective health and needs based screening as set out above would assist in ensuring that accommodation allocation is right the first time.
- Further support is needed for the 'move on' process. Once a person seeking asylum has been granted leave, we often find that local authorities are reluctant to arrange temporary accommodation until the day of eviction, despite being given plenty of advance warning. This then means that those being evicted face a very stressful period of not knowing where they will be living until the day they become street homeless and so being unable to prepare. Neither the Home Office or the local authority will take responsibility for the person getting to their new accommodation and the move is often arranged at the last minute causing high levels of stress.

Providing the right support that people need while waiting for a decision on their application should be a core part of a compassionate and fair asylum system. Asylum accommodation should be welcoming and safe; embedded in communities; with access to NHS healthcare and legal advice and support services. In response to this consultation, we would strongly urge the Home Office to put together a set of minimum standards for dispersal areas to be used as an ongoing reference tool to ensure they those moved to new areas are able to access the services and accommodation they need.