

# HOME OFFICE REVIEW OF ASYLUM SUPPORT RATES

## **Helen Bamber Foundation submission**

September 2023

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, they build the strength to move on with their lives. 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.

This submission looks at the basic needs provided for by asylum support payments, with reference to the Home Office's reports on the allowances paid to asylum seekers and failed asylum seekers from 2020 and 2021,<sup>1</sup> and the increases made since then, and the most pressing issues that have been identified by HBF in relation to our clients. Many of our clients receive asylum support, including under sections 95, 98 and 4(2) of the Immigration and Asylum Act 1999. The low asylum support rates affect them in myriad ways, permeating much of their life in the UK and with a detrimental impact on their emotional, material and physical wellbeing. In our collective clinical experience at HBF, the low rates of financial support provided to our clients can cause them considerable distress and add to their low self-esteem and mental health problems. This can significantly impede their engagement with and progress in therapy. Asylum support rates must be raised to more realistically reflect the needs of asylum seekers - we set out our recommendations below.

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<sup>1</sup> [Report on review of cash allowance paid to asylum seekers - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/81444/Report_on_review_of_cash_allowance_paid_to_asylum_seekers.pdf)

## 1. The Home Office approach to calculating asylum support rates – key concerns

HBF believes that the Home Office's methodology for assessing the levels at which to set asylum support needs changing for a number of reasons:

- 1) The assessment is based on the needs of able-bodied individuals and appears to make no allowances for those in the asylum system with additional mental or physical health needs but do not reach the threshold required to make them eligible for additional support such as that from a local authority support - under the Care Act 2014. The lack of consideration for those who have additional vulnerabilities is causing considerable difficulties for many of our clients.
- 2) The assessment methodology includes assumptions about additional funding and support that is simply not available in practice. While certain types of additional support may not always be the responsibility of the Home Office, if the department is not sure that additional funding is available *in practice* (and/or not taking steps to check that it is), then that support should not be included in calculations. We believe further steps should be taken to ensure that funding is practically available before it is relied on as part of this assessment.
- 3) The assessment methodology includes assumptions that asylum seekers are housed 'in urban areas' and proximate to essential services – this is not always the case, even more so now that the full dispersal model is rolled out across the UK, engaging less urbanised local authorities.
- 4) The amount of financial support deemed necessary to cover the costs of meeting food needs is taken from Office of National Statistics (ONS) information about the amount of money spent on the items by individuals in the lowest 10% of income group in the UK. However, ONS data does not take account of the additional needs of asylum seekers, such as the fact that they often arrive with no possessions and do not have a support network on which they can rely. There is a significant backlog of asylum cases (in July 2023, there was a backlog of 136,779 cases awaiting an initial decision for asylum claims)<sup>2</sup> and many individuals will be forced to live on crippling low levels of support for years, with an inevitable negative impact on their mental and physical health. We do not believe the lowest 10% in the ONS data is an adequate benchmark for the essential living needs of those in the asylum system.
- 5) There is no meaningful consideration of what people who actually live on asylum support experience. A small number of charities, including HBF, can provide very good information about their clients but the actual experiences of men, women and children with direct experience of asylum support, including those who have no access to charity support, is absent from the Home Office's consideration. By comparison, the Department of Work and Pensions relies on data from the Family

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<sup>2</sup> [Statistics relating to the Illegal Migration Act](#)

Resources Survey which is a survey with people living on low income. They also commission research to consider things like material deprivation among households on low income.

Given the flaws in the methodology used to reach previous rates, we do not believe that simply increase those figures in line with inflation is sufficient as the starting point was already too low.

There is no report on a review of weekly allowances paid to people seeking asylum from 2022. The review carried out in 2021, published in 2022, acknowledged evidence from NGOs but dismissed their recommendations with little or no engagement with the wider arguments behind them. For example, while the report on the review acknowledged that *"some responses also highlighted that that assessment of the level of the weekly allowance is based on the needs of able-bodied individuals, making no allowances for those with additional mental or physical health needs"* the Home Office simply stated that anyone with exceptional needs *"is able to apply for additional funds"*, disregarding our detailed submission outlining the difficulty or impossibility of accessing those funds. **We hope that this review more closely considers the submissions made by NGOs, including this one from HBF, and if the Home Office declines to take on board our evidence and recommendations then it will provide clear reasoning for doing so.**

In the following section we look at different living needs in turn but our key recommendations would be that:

- An alternative approach to assessing appropriate levels of support should be taken, with the starting point that it is essential to assess what rate would be necessary for an *acceptable standard of living*, not just what must be covered as a bare minimum. We recommend the Home Office considers the Joseph Rowntree Foundation's work on the Minimum Income Standard (MIS).<sup>3</sup> This presents a vision of the living standards that we as a society consider everyone in the UK should be able to achieve, whether they are in work or reliant on state support.
- In the interim, the rate of asylum support should be the equivalent of mainstream benefits *minus* a proportion of that figure (up to 30%) to allow for utilities, rent and other costs covered separately by the Home Office. The Home Office has previously rejected aligning asylum support allowances with mainstream social security benefits because the latter *"are not set according to the 'essential living needs' test and are generally required to cover a broader range of costs, including paying for utilities"*.<sup>4</sup> No clear explanation has been given as to why those on asylum support have different *"living needs"* to those on mainstream benefits (indeed, arguably they have

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<sup>3</sup> <https://www.jrf.org.uk/report/minimum-income-standard-uk-2021>

<sup>4</sup> [Report on review of weekly allowances paid to asylum seekers and failed asylum seekers: 2021](#), April 2022

greater needs because of arriving with no possessions; extremely long delays in asylum decision making; and their additional vulnerabilities). If asylum support was set at 70% of Universal Credit levels this would recognise **that asylum support covers a reduced range of costs - the 30% difference would account for utilities, council tax, rent etc** and would align with current practice where the Department of Work and Pension can deduct up to 25% from Universal Credit payments for certain costs (including utilities, Council Tax, rent and service charges).<sup>5</sup>

People receiving asylum support have received only minimal uprating to the weekly rate, even during the pandemic, and continue to be excluded from all cost-of-living payments, made to those on low incomes, people acknowledged as disabled through their entitlement to disability benefits, and those who are over State Pension age. These payments are for general cost of living increases in recognition of the struggles of those on low incomes, but exclude those on asylum support. This is even though the threshold for eligibility for asylum support is destitution - so far lower than access to benefits – and people seeking asylum start from an even lower base rate with no savings to fall back on.

The table below shows the current Universal Credit rate for single adults over 25, and what that rate would be if the DWP deducted the maximum amount possible (25%) for 'third party deductions' (covering Council Tax,<sup>6</sup> utilities and rent) under its current policy. It also shows what a person seeking asylum would receive if paid 70% of current Universal Credit rates or if the Home Office simply increased the support rate by Consumer Price Index (CPI) rate. It is clear that simply increasing by the CPI rate leaves those seeking asylum worse off than everyone else in the country reliant on state support:

Circumstances of individual	Universal Credit payment per month	Universal Credit payment per week <sup>7</sup>	Universal Credit payment per week if max amount deducted for rent, utilities & Council Tax <sup>8</sup>	Asylum support rate if based on 70% of Universal Credit	Asylum support rate at July 2023 after CPI increase
Single and 25 or over	£368.74	£85.09	£63.82	£59.57	£47.39

<sup>5</sup> [Universal Credit: What you'll get - GOV.UK \(www.gov.uk\)](https://www.gov.uk/universal-credit-what-youll-get) and [Find out about money taken off your Universal Credit payment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/universal-credit-payment)

<sup>6</sup> Those on low income also get council tax reductions which those with No Recourse to Public Funds - including those on asylum support are ineligible for.

<sup>7</sup> Calculated by taking monthly payment and multiplying by 12 to get annual payment then dividing by 52 to get weekly payment

<sup>8</sup> 25% deduction based on existing policy [Find out about money taken off your Universal Credit payment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/universal-credit-payment)

It is of course important to still note that studies have shown that mainstream benefits rates have severely deteriorated over recent years meaning that even those receiving UC are struggling.<sup>9</sup>

- Travel and communication should be classified as essential needs – having access to these services is crucial to people’s well-being, to their ability to stay in contact with their support networks, doctors and legal representatives, to progressing their asylum claims, and to them and/or their children continuing their education.

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. 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.

- The assessment used for the rates review should look at what support is required to enable people to maintain interpersonal relationships and a minimum level of participation in social, cultural and religious life – for example, ensuring they are able to attend religious services, see friends and family, and engage in community activities more than once a week.<sup>10</sup>

## 2. Essential living needs not adequately addressed by asylum support rates

We do not think that the methodology used previously captures all “essential living needs” of individuals in the support system, for the following reasons:

### *Travel*

In the 2022 Home Office report, it repeats the 2020 report in stating that *“we continue to consider that [travel and communication] are not essential needs in themselves, but accept that they may be necessary in limited circumstances to enable other needs to be met, including those related to maintaining interpersonal relationships and a minimum level of participation in social, cultural and religious life.”*

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<sup>9</sup> <https://covidrealities.org/learnings/write-ups/covid-realities>

<sup>10</sup> See *Refugee Action v Secretary of State for the Home Department* [2014] EWHC 1033 (Admin), para 116: “However what is involved in practice in affording asylum seekers an opportunity for a minimum level of participation in social, cultural, and religious life, is a different question. So too is the question what, if any, financial support it requires. What is meant by “minimum”? What activities are covered by “participation”? What costs, if any, are necessary to enable such minimum participation? (...) They are judgments for the Secretary of State. They are ones which she has not yet made, because on her behalf it is contended, in my view erroneously, that this is a category of need which does not require consideration. In this respect the decision making process was flawed”

For most HBF clients, travel is vital to ensuring they can fulfil their other essential needs, including access to adequate food and healthcare (see below). Furthermore, the limited rate of asylum support makes it extremely difficult for asylum seekers to engage in any other activities, due to prohibitive travel costs. These include accessing college and other educational bodies (our clients are very rarely considered eligible for Discretionary Learner Support Funds and colleges sometimes do not have travel bursaries), social support networks, and religious and/or cultural establishments.

The inability to travel for such purposes increases social isolation, prevents people from learning English and integrating within their communities more generally and causes a deterioration in mental health. The inability to travel elsewhere other than the immediate vicinity of their accommodation, combined with the often-poor quality of asylum support accommodation, increases feelings of hopelessness and negatively impacts mental health.

*"Ultimately, if you cannot afford to travel, what do you spend your time doing? Locked in your room, recounting the trauma you have been through to get here and with no outlet available for you to have an activity or something to look forward to. Your mental health deteriorates really, really quickly. It is just a natural human instinct not to be alone."*

HBF client

As mentioned above, the notion that travel costs are not essential in part relies on the assumption that, as stated in the 2020 report, 'asylum seekers are invariably accommodated in urban areas' which infers they will be close to all the services they need. In line with the Allocation of Accommodation Policy,<sup>11</sup> clients of HBF are required to be housed within zones 1-6 of London, and therefore are ostensibly accommodated in urban areas. However:

- We are aware of the more acute difficulties facing asylum seekers accommodated in less urban areas in other parts of the UK.
- Even within zones 1-6 of London, several of our clients have been placed in areas which are not in the near vicinity of affordable shops. Many of our clients have complex mental and often physical health conditions, impacting their ability to travel.

*"I am forgoing medical treatment because all I can think is how much it is going to cost me. I need to see my GP, get a blood test and pick up my blood pressure monitor but these will all be separate trips. I can't afford to do them all."*

HBF client

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<sup>11</sup> Home Office, Allocation of accommodation policy, Version 6.0, 2021

As of January 2023, the Home Office has allocated £5.62 a week to travel in its assessment of asylum support rates (see Appendix I for our calculation of currently asylum support rates). In Greater London, the region in which our clients reside, the cost of a travelling by bus for up to an hour is £1.75.<sup>12</sup> Those with a mental or physical disability are likely to need to take a bus even to travel just a short distance (e.g. to their GP surgery or to a larger shop to buy food) – to do a return journey just once a week costs £3.50 in total, leaving £2.12 for the rest of the week's travel allowance according to the Home Office; this amount only cover a single hour of bus travel.

*“The forever increasing cost of [journeys made by] Oyster [card] has been the hardest thing for me. It has been increasing by 10ps and sometimes even by pounds. So when you think you have a budget that's been tightly allocated to you, you work out what you need to survive. The constantly increasing cost of travel makes you have to reassess your budget and work out what else you will have to go without.”*

HBF client

Many of our clients suffer from symptoms of Post-Traumatic Stress Disorder, as well as other severe mental health conditions including major depressive disorder, anxiety, and psychosis. Many have 'dissociative' symptoms – i.e., have episodes in which they go 'blank' and are transiently aware of their actions and/or their surroundings. They can become lost while travelling, catching the wrong bus or train and then not know where they are. With such a limited amount of financial support, there is little room for these types of errors, which are common for people with severe mental health conditions and a history of traumatic experiences. Many people end up walking to their destination, a journey which can take several hours and cause both mental and physical exhaustion. Many also do not have friends or family who can support them in making these journeys.

The NHS Healthcare Travel Costs Scheme (HTCS) can refund reasonable travel costs if a person has been referred to hospital or other NHS premises for specialist NHS treatment or diagnostic tests. However, this excludes visits to a GP, dentist or other primary care service provider, including antenatal care.

One HBF client was referred to free physiotherapy by her GP but it was a floating service based in the building of a private clinic, so she was unable to ask for reimbursement via the HTCS as it wasn't in a hospital or NHS building. She struggled to afford the travel to the appointments, which were weekly for six weeks.

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<sup>12</sup> [Bus and tram fares - Transport for London \(tfl.gov.uk\)](https://tfl.gov.uk/road-users/bus-tram-fares)

Furthermore, in our experience the HTCS is not well known among asylum seekers who require specialist NHS treatment, and fall within the eligibility of the HTCS, nor is it actually accessible. Many hospitals have no or only a partially staffed cashier's desk, and so asylum seekers who do know about the HTCS are very unlikely to have their travel money reimbursed on the same day. Prompt reimbursement is essential when the weekly rate of support is so low. If the travel costs are claimed retrospectively, the NHS usually does this via a bank transfer. Given that asylum seekers are largely prohibited from opening a bank account, this makes it difficult / impossible to receive retrospectively reimbursed travel money.

**Recommendation: Travel should be recognised as an essential need for the purposes of assessing levels of asylum support**

**Recommendation: The allocation of money for travel should be increased to a level that would cover at least three return bus journeys a week, wherever the recipient is accommodated.**

The 2020 Home Office report states that *"the costs of travel for purposes unique to asylum seekers are covered through separate arrangements. Travel to legal appointments is met through legal aid and travel costs to reporting events, asylum interviews and appeal hearings are paid separately"*.

Many asylum seekers in receipt of asylum support do not automatically receive additional payments for travel from the Home Office when they are required to attend reporting centres on a regular basis. Their reporting frequency could be anything from weekly to annually, and, depending on their reporting time, may require travelling at peak time, which is more expensive.

For example, we have a client who has to report every week as a Foreign National Offender who has to spend about a third of his section 4 money every week just on travelling to Eaton House. Ensuring that a person receives a travel ticket or the balance uploaded to their Aspen card in event of the reporting date often requires third-party advocacy. Lack of funds in order to report is unlikely to be accepted as an adequate reason for having failed to report, and therefore puts people at risk of enforcement, due to being unable to afford to travel through no fault of their own.

**Recommendation: The Home Office should make telephone reporting more widespread.**

Travel tickets are usually sent prior to attendance at the substantive interview. However, this can be an unreliable and inflexible way of facilitating travel. We believe people should be able to choose their method of travel, especially to such pivotal appointments which incur a great amount of stress, not least due to the time many people wait to attend their substantive interview. We have known clients who feel uncomfortable and that their PTSD



symptoms are exacerbated when travelling by the London Underground, and were additionally anxious at needing to do this – instead of preferably travelling by bus – in order to attend their substantive interview, which is such a critical part of their claim for asylum and often deeply anxiety-inducing.

In our experience, it can also require third party advocacy to ensure that travel tickets or expenses are provided in advance of reporting events, interviews, and appeal hearings.

**Recommendation:** When a person is provided with asylum support of any kind and made to report in person, they should automatically have funds amounting to a day's bus ticket automatically added to their Aspen card ahead of a reporting event. The same should apply to asylum interviews and appeal hearings.

We are aware that travel to appointments with a person's solicitor can be reimbursed via the Legal Aid Agency, according to the Legal Aid Agency's 2013 Standard Civil Contract Specification. In HBF's experience, though, many solicitors are unaware of this provision, and therefore do not inform clients of this nor apply for this disbursement.

In addition, many of our clients lack knowledge of this disbursement, as well as often the literacy and confidence (as well as other skills affected by their severe mental health conditions, for example adequate concentration amidst dissociative episodes) required to request their solicitor to reimburse their travel expenses, and to continue to request this on a regular basis.

**Recommendation:** We recommend that the Home Office works with the Legal Aid Agency to simplify the process by which recipients of asylum support can have their travel expenses to attend legal appointments reimbursed and ensure that all firms with an immigration Legal Aid contract be informed of this.

### **Food**

We believe that the assessed amount to cover food of £32.14 (see Appendix I for our calculations of current support rates) is insufficient to cover the weekly diet needs of adult asylum seekers and any dependent children.

Many of our clients are likely to have been deprived of adequate nutrition in previous, often precarious living situations (e.g. detention, situations of trafficking, other exploitation and torture) and it is therefore particularly important that they be able to obtain adequate nutrition. However, fresh fruit and vegetables – essential to meet a person's dietary needs – are unaffordable within this amount while also buying a sufficient number of staple foods.

*"If I choose to go to an extra [healthcare] appointment, the whole week, I will not eat anything. I'll go to Sainsburys at 6pm to look at the reduced section for 99p. There are undoubtedly long term health effects of being consistently malnourished."*

HBF client

Furthermore, the Home Office market research used to calculate the costs of meeting certain essential needs assumes that it will be straightforward for those seeking asylum to 'shop around' to identify the cheaper outlets and take advantage of cost savings. As outlined above, while living in asylum accommodation, access to shops in which one can bulk buy cost-effectively is not guaranteed. For example, if you live within walking distance of only a small supermarket or off-licence shop, you would need to travel (and therefore spend money on further transport) to bulk-buy, and also be physically and mentally fit enough to carry these purchases home. This is not always possible. Additionally, potentially cheaper outlets such as markets may require people to pay in cash meaning that those receiving support under section 4 cannot shop at these outlets as they are unable to withdraw cash.

The asylum support rates review assumes able-bodiedness and does not adequately consider those who have physical or mental health difficulties. A client of ours is due to have an operation on his leg, which will limit his mobility even further for at least the following 10 days. This will leave him unable to go out and buy food, and he does not have anyone in the UK who can do this for him. He cannot buy enough food in advance for this period, in part because of the very low amount paid weekly and because he is already physically disabled and so already struggles to carry enough food from a larger weekly shop home. He cannot rely on the other people in dispersal accommodation to shop for him by giving his Aspen card to him nor by giving cash. He will not be able to travel to a foodbank during this period due to his increased limited mobility. Another client recently suffered a significant fall, affecting her mobility and causing her significant back pain. She has therefore very much struggled to go outside and buy food for her and her children, and could not have applied for additional support in advance of this, as it was an entirely unexpected injury. Many clients with chronic physical health issues affecting their mobility experience these issues routinely, limiting their ability to get enough food and nutrition.

Clients will also face challenges with storing items such as not having a freezer or having limited space given that they live in shared facilities. We also find that often in asylum support accommodation the cooking facilities are inadequate and there is a lack of pots and pans further limiting the effectiveness of bulk-buying and requiring the purchase of further essential items. One of our clients recently dispersed was moved to a flat which has no cooker (which is contrary to the Statement of Requirements for Asylum and Accommodation Support Contract providers), meaning that he and the other residents are not able to cook their own food, making this need even more expensive for them.

The amount allocated for food is particularly insufficient for people who are required to maintain a diet of specific foods for a health condition. Several of our clients are currently

required to maintain a specific diet yet are unable to do this within the limitations of asylum support.

Many of our clients, particularly those with children, report not having enough money to buy enough food for their family, and in our experience parents regularly skip meals themselves in order to ensure their children are more adequately fed. If asylum support payments were adequate for covering all 'essential' living needs then people within the asylum system would not report that they were going hungry and would not need to rely on charities to help them meet their basic needs in relation to food or other expenses. Such a reliance would, as defined by research from the Joseph Rowntree Foundation, constitute living in destitution.<sup>13</sup> Yet, HBF has to provide foodbank vouchers to clients in receipt of asylum support on a near weekly basis, as our clients struggle to feed, clothe and generally provide for themselves within this amount.

Even if this reliance on foodbanks was deemed in any way acceptable, it is not an adequate solution to inadequate asylum support provision. The provision of foodbank vouchers relies on asylum seekers' engagement with, and knowledge of, organisations which understand their material circumstances and these organisations' ability to issue foodbank vouchers and food directly. Once a person is referred to a foodbank, they will then need to travel to the location (see above for why this is problematic) and foodbanks try to give out as much non-perishable food as possible, meaning that food provision again excludes vulnerable asylum seekers from maintaining a nutritious diet. Furthermore, many foodbanks operate their own policies regarding how many times an individual/family can access their services. It may be that a person can only visit the foodbank three times in total, or that there is a limit on how many times a person can visit within a particular timeframe. This means that foodbank provision is a short-term fix for a long-term problem, and many of our clients find themselves back at square one but with fewer options available.

### *Healthcare*

As outlined earlier in this response, the NHS Healthcare Travel Costs Scheme (HTCS) is inadequate for several reasons for the refund of travel to secondary NHS care to people receiving asylum support. In addition, we frequently support clients who are trying to navigate receiving appropriate care and treatment from the NHS and struggle with additional costs, separate to travel; in part this is due to the very low rate of weekly asylum support leaving no room for misunderstanding, error, or delay. The Home Office calculation of asylum support rates currently includes a tiny amount for non-prescription medicines, presumably on the basis that all prescriptions are covered.

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<sup>13</sup> Fitzpatrick, S., Bramley, G., Sosenko, F., Blenkinsopp, J., Johnsen, S., Littlewood, M., Netto, G. and Watts, B. (2016) Destitution in the UK. Joseph Rowntree Foundation.

In order to receive free prescriptions, dental treatment, sight tests, glasses and contact lenses, travel costs and wigs/fabric supports, you must have a valid HC2 certificate via the NHS' Low Income Scheme. Whereas other mainstream benefits automatically qualify a person for full help with health costs, asylum support is not listed as such, and thus people seeking asylum must apply for a HC2 certificate in order to prove their low income.<sup>14</sup> Only on receipt of the HC2 are they then able to provide proof – to a hospital, optician, dentist, etc. – that they are entitled to help with health costs.

The system for providing HC2 certificates for people seeking asylum is chaotic; the online form does not allow a person who confirms that they receive financial support from UKVI to continue with the form and advises that they contact UKVI instead. However, in our experience, contacting Migrant Help to request a HC2 certificate rarely yields a prompt response; only once the HC2 is received can a person receive this healthcare for free.

With those delays, people often go for many months without this certificate. In that time, they cannot receive help with prescription costs; if they declare that they are entitled to help with health costs and do not have a valid HC2, they are likely to receive a penalty charge notice from the NHS Business Services Authority. If they use their very limited asylum support to purchase a prescription, they are likely to then be out of pocket for a significant amount of time, or remain so (the former depending on whether they are aware of the possibility to request a refund, and are able to request this for themselves). The full-board catered accommodation rate currently does not cover the cost of even one NHS prescription. In light of these two options, we often experience clients 'opting' for a third; going without their prescribed medication until such time as a HC2 arrives. It is unsafe for people to be in this position. Even once the HC2 arrives, it lasts for six months only (and must be applied for again if someone is moved to alternative accommodation), starting the entire process again.

Additionally, and of particular concern for people receiving the full-board rate only, many medications are advised by GPs but not officially prescribed, meaning that they cannot be provided for free, even if accompanied by a HC2 certificate. Changes implemented in 2018 mean that since then *'a GP, nurse or pharmacist will generally not give you a prescription for certain medicines that are available to buy in a pharmacy or supermarket, even if you qualify for free prescriptions.'*<sup>15</sup> The list of conditions is extensive, and were someone to need these on a regular basis (e.g., a sore throat over several weeks, or coughs/colds throughout several months of the winter) would amount to a significant proportion of the person's weekly allowance. The amount allocated for non-prescription medication does not take into account these changes. There is also no obligation for a pharmacy to offer a generic

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<sup>14</sup> <https://www.nhsbsa.nhs.uk/nhs-low-income-scheme>

<sup>15</sup> <https://www.nhs.uk/common-health-questions/medicines/why-cant-i-get-prescription-over-counter-medicine/>

formulation of an over-the-counter medication, leaving patients seeking asylum with very limited income at risk of buying a more expensive equivalent of the medication they need. We recently saw written in a person's NHS record, a patient who lived in a full-board hotel: *'this may increase risk to mental health as can't afford OTC medication'*.

**Recommendation:** The asylum support allowance should be increased to allow for health costs, include the wide range of ailments for which medication is not prescribed and therefore must be paid for.

**Recommendation:** In line with other eligibility criteria for, for example, Free School Meals, the receipt of support under Part 6 of the Immigration and Asylum Act 1999 should be an automatic passporting benefit for eligibility for full help with health costs. This would remove the need to continually apply for HC2 certificates, which often leaves long gaps where someone cannot prove their low income for the purposes of help with health costs. Should this not be possible, urgent reform is required to the processing and issuing of HC2 certificates to people seeking asylum, and this process should be automatic.

### *Household cleaning items and toiletries*

The 2020 Home Office report outlined that *"household cleaning items are now provided by the accommodation providers in Houses of Multiple Occupancy (HMOs)"* and so the support rates only cover toiletries (£0.82) and laundry/toilet paper (£0.52), amounting to £1.34 per week.

In our experience, residents of asylum support accommodation are often not provided with household cleaning tools required to clean their accommodation. Many people therefore are required to purchase items such as brooms and mops, all of which are too expensive to be covered by £1.34 per week.

A new packet of toilet paper is very likely to cost more than £0.52, even if someone is somehow able to purchase only one roll. The very low rate of asylum support to meet someone's basic needs, and how it is calculated, means that, should someone need to purchase a new packet of toilet paper and it cost more than £0.52 they then have less money for other essential needs.

In several cases, our clients have entered asylum support accommodation for the first time, after a period of prolonged homelessness and destitution, and needed to spend much of the full first week's payment on household cleaning items, due to the lack of cleanliness in the accommodation when they moved in, leaving no money for other needs that week.

Many of our clients are likely to have lived in unclean conditions in previous situations (including situations of trafficking and other exploitation, torture, homelessness). Due to the symptoms of Post-Traumatic Stress Disorder and the impact of traumatic events, they can be particularly susceptible to feelings of shame and inferiority and lack of hygiene can be

particularly triggering for them, leading to a deterioration in mental health. It is therefore particularly important, both for their physical and mental health, that they be able to maintain their living space and personal hygiene adequately, requiring sufficient amounts of toiletries and household cleaning items.

Furthermore, due to these symptoms and the impact of traumatic events, our clients are less likely to find and approach organisations which may be able to provide items for free, including toiletries, clothing and footwear, where they do exist.

In particular, menstrual products are often expensive. We do not consider that the number of menstrual products stated by the Home Office within the most recent in-store market research reflects the actual number of the specific product needed within the average period, particularly given that the lowest cost items are those most likely to need to be replaced more frequently and a significant minority of people experience heavy menstrual bleeding, requiring much more frequent changing.<sup>16</sup>

Many of our clients use sanitary towels instead of tampons. In our experience this is due to various factors including the psychological and physical effects of sexual violence and a lack of familiarity with tampons, as well as the relative costs of both types of product.<sup>17</sup> Many of our clients also report gynaecological conditions causing heavy periods (including fibroids, endometriosis and polycystic ovary syndrome). This also requires more regular changing of menstrual products, therefore incurring a higher cost not reflected in the in-store market research undertaken by the Home Office for the last review of section 95 support rates.

**Recommendation:** Particularly given the reported failure of asylum accommodation providers to ensure that adequate household cleaning products are available, the Home Office should include the cost of essential cleaning products in its assessment of asylum support rates. It should also increase the toiletries allowance to better cover the essential needs of people who menstruate.

### *Communication*

As with travel, the Home Office does not consider communication to be an essential need. Yet the Covid-19 pandemic has demonstrated just how essential access to data and online forms of communication are. In light of the many changes to working introduced in response to Covid-19, many essential services such as GPs are now operating online, to book appointments and carry out consultations. Many services continue to be frequently provided online e.g. access to GPs; Migrant Help webchat – which many people may feel more comfortable using than the long wait on the free helpline; applying for children's

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<sup>16</sup> See Royal College of Obstetricians and Gynaecologists, National Heavy Menstrual Bleeding Audit at <https://www.rcog.org.uk/en/guidelines-research-services/audit-quality-improvement/completed-projects/national-hmb-audit/>

<sup>17</sup> <https://www.bloodygoodperiod.com/period-poverty>

enrolment in school; Free School Meals applications etc.; and many educational courses; as well as the need to be able to access email and the internet in order to maintain contact with all of these services, including legal representatives. Furthermore, communicating with family members from whom they may have been separated is an ongoing fundamental need and right for those seeking asylum.

Asylum seekers cannot usually access a phone contract without a bank account or credit history, following legislation disallowing asylum seekers from opening bank accounts, therefore pay-as-you go is often the only option. Access to the internet is invariably not provided in asylum support accommodation – the review still states that people should be relying on libraries for internet use but these are not always available and involve the same issues with travel as raised above. This means that even clients who are able to use internet and email facilities must rely on either calling their legal representative and GP surgery (costing money via pay as you go) or travelling to their offices directly (almost always costing money for travel). This also particularly impacts households with school-age children, who often require access to the internet in order to do their homework.

**Recommendation: Communication should be recognised as an essential need for the purposes of assessing levels of asylum support, and digital inclusion should also be considered as part of that assessment, with Wi-Fi provided as standard in all asylum accommodation.**

### *Clothing*

The clothing and footwear needs of an asylum seeker, for which they are allocated £3.60 a week, are considered by the Home Office to be three pairs of underpants, three pairs of socks/tights, two vests/bras, two tops or shirts, two pairs of trousers or skirts, two cardigans/jumpers, one coat, and two pairs of shoes, nightwear, and a hat, gloves and scarf. We do not believe that the current allowance is sufficient. People often arrive in the UK with very little clothing and lack the resources to locate services, if even available in their local area, which may be able to provide clothing and footwear for free.

Wearing the same set of clothes for prolonged periods, a situation in which many of our clients find themselves, exacerbates clients' feelings of humiliation, shame and indignity, in addition to the symptoms of Post-Traumatic Stress Disorder and the impact of traumatic events. Many of our clients ask for help with this, as they arrive with very few clothes and are unable to afford purchasing more.

The current asylum support rate is also insufficient to purchase seasonally appropriate clothing. Suitable winter clothing is expensive to buy, particularly at short notice when most required, and particularly if asylum seekers have dependent children who are often still growing at fast rates. Usually over the winter, HBF collect donations of winter clothing to

distribute among our clients who are seeking asylum, but this is not a sustainable solution – state support should be sufficient to ensure people can clothe themselves.

Recommendation: The allocation of asylum support should be increased to be sufficient for the purchase of suitable clothing all year round, including for dependent children who will continually outgrow their clothes.

### *Additional payments under Regulation 10A of the Asylum Support Regulations 2000 and Maternity Grant*

These payments have not increased since their implementation; we welcome the fact that they are finally formally included in the purview of the Home Office's review. The additional payments of £3 per week for people who are pregnant or have children aged between 1 and 3, and of £5 for people with a child aged up to 1 are wholly inadequate to meet the additional needs incurred for these families.

Whilst the weekly rates were inadequate already, the cost-of-living crisis has worsened this for parents; the cost of toiletries, clothing and other equipment needed for infants and young children has increased, which are essential to maintain a child's health and development. The rates also do not allow for the rise in food prices, making buying healthy food very difficult.

There is an additional issue for people housed in full-board hotels; the majority of our clients housed in full-board hotels raise issues with the poor quality, nutritional value, repetitiveness and otherwise unsuitable nature of the food provided. We believe that the rate provided to people in full-board initial accommodation should be increased generally, however parents often need to supplement the food provided for them and their children in full-board accommodation, as their children refuse to eat the food provided. This leaves parents in this position no choice but to spend the very low full-board rate on food that their children can eat.

#### Recommendations:

- All additional payments to parents with young children should be increased, as these have not risen in line with asylum support increase, and the amount currently provided does not cover the essential living needs for pregnant people, and parents with infants and young children. These payments should be increased (immediately and annually) in line at least with those issued via Healthy Start payments, issued by the Department of Health and Social Care.
- Maternity payments for those on support under Section 4(2) should be the same as for those on Section 95, so all parents of newborn children receive £300. The essential living needs of a newborn child do not change dependent on the status of its parent's asylum claim.
- The window in which the maternity payment should be widened, both pre- and post-birth, to enable parents who may not be aware of its availability immediately to



apply and benefit from this grant. We understand the current window to submit proof of birth, in order to receive payments backdated to the newborn dependant's date of birth, is only 14 days.

- When a supported person has declared that they are pregnant, they should be automatically contacted an appropriate number of months later, encouraged to update Migrant Help and, if they have given birth, given information on their entitlement to apply for an additional amount of support.
- It should be made clear to pregnant applicants that they do not require a MATB1 to request the weekly maternity payment, only confirmation of the pregnancy. Waiting until someone is issued with a MATB1 can mean that they miss out on weeks or months of payments they are eligible for already.

### *Children's specific needs*

The 2020 Home Office review claims that *"any extra costs in some households of meeting particular needs (e.g. clothes for teenagers) are comfortably offset by the availability of economies of scale that mean other costs per person in the household fall. [...] Applying a flat rate... per person in a household therefore means that all families, regardless of their size and composition, will have sufficient to cover their full essential living needs."* This is reiterated in the 2022 report, which also highlights that children of people seeking asylum will have access to free school meals and free travel to/from school. Whilst Free School Meals are now accessible to those in receipt of both section 95 and section 4, there are frequent issues with applying for Free School Meals from the local authority (which requires literacy in English and digital skills or access to third-party advocacy, and the local authority accepting proof of the person's asylum support reference number and grant of asylum support). In terms of free travel to/from school, this does not reflect the fact that due to the age of the child(ren) and/or distance from the asylum support accommodation to the school, parents need to take their children to school, thus spending more of the available weekly allowance on essential travel, resulting in less money available for food and other essentials.

Many of our clients with dependent children struggle to fully meet their needs with the current rate of support. HBF clients with children often struggle to buy the items that they need, including adequate nutritious food, clothing and educational items.

### *School uniforms*

Home Office report (2020) estimates that the school uniform to be purchased within current asylum support rates for a child aged three-12 consists of two trousers/skirts, two polo shirts/blouses/shirts, one school jumper, one pair of shoes, one school bag, and for a child aged 13+, one additional sports top, set of tracksuit bottoms and pair of shorts/skirt.

Anyone with school-aged children will know that this is a completely unrealistic amount of uniform for a child – it would require almost daily washing which would simply be

impossible given the extremely low funding granted for laundry (see above) and ignores the fact that often children will need additional shoes for school. It is also unclear why the Home Office believes that primary school children would not need a PE kit. Even if the primary school does not require a uniformed PE kit, they would still require children to have suitable clothing for PE, which, as explained above, is not always possible for those seeking asylum.

Furthermore, it is well known that school uniforms can be prohibitively expensive due to the number of (often branded) items required, and these are not always available from the three shops surveyed as part of the assessment.<sup>18</sup>

The 2018 Home Office report claimed that *"in most cases if a child is entitled to free school meals... it is likely that the child will be entitled to apply for [school uniform] grants"*. HBF has a running record of the availability of these grants across the 32 London boroughs, and we find that they were generally inaccessible. In 19 of 32 boroughs, it is not possible to apply for a school uniform grant from the local authority, even if in receipt of free school meals, because of various reasons: in some local authorities the school uniform grant had been abolished; it was only available to people not subject to immigration control; asylum support was not listed as a qualifying benefit; or there was no information online regarding the existence of a council-funded grant scheme, despite significant research.

Many of the boroughs which do not have school uniform grant programmes advise would-be applicants that the council does not have its own grant for school uniforms, and to enquire at the school itself regarding their policy. This places the onus on the family in receipt of asylum support to find out from the children's school, rather than being an automatic acceptance, in the case of free school meals under the government's Pupil Premium scheme.

In eleven of the boroughs that do offer some assistance, children of families in receipt of asylum support can apply for a school uniform grant only if transferring to secondary school that year or starting at primary school, and therefore for a specific and time-limited purpose, or in *'exceptional circumstances'* (sometimes referring to circumstances including families having lost clothes in a fire, flood, theft, through having been made homeless, or having had to flee domestic violence).

Whilst school uniform grants are available in all devolved nations, recent research shows that only 31 local authorities in England – out of 317 – provide any assistance, however limited, with the costs of school uniforms.<sup>19</sup>

We note that the Home Office does not refer to school uniform grants in its 2020 review.

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<sup>18</sup> <https://www.childrensociety.org.uk/information/professionals/resources/the-wrong-blazer>

<sup>19</sup> [https://www.moneysavingexpert.com/news/2023/07/school-uniform-grants/#:~:text=\(1\)%20A%20further%20ten%20councils,or%20have%20been%20made%20homeless.](https://www.moneysavingexpert.com/news/2023/07/school-uniform-grants/#:~:text=(1)%20A%20further%20ten%20councils,or%20have%20been%20made%20homeless.)

We are aware that under Section 96(2) of the Immigration and Asylum Act 1999, if the circumstances of a particular case are exceptional, further support may be provided to a person seeking asylum and any dependants "*in such other ways as considered necessary*".<sup>20</sup> However, the need for new school uniforms (and other clothes and shoes for children) is a continual and annual need, and should therefore be allocated as standard, rather than requiring families to complete the complex section 96(2) application and risk remaining unable to purchase the school uniform (and other vital clothing) for their children. HBF has previously submitted several section 96(2) applications for this additional support, for the explicit purpose of purchasing school uniform and with evidence of exhausting other options, but no response or decision to these applications was ever received.

#### Recommendation:

- An additional payment should be provided each year – per child – to families with school age children in order to buy school uniforms. This should be prioritised for people who are living in full-board accommodation.

#### *Educational materials for children*

The products suggested by the Home Office are not sufficient for children to properly enjoy and thrive in their education in the 21st century. The Home Office rates review includes the costs of 'a 300 sheet A4 refill pad, and up to 20 ball point pens', ignoring the fact that children will usually also need books, a calculator, pencil case, ruler, a rubber, a pencil sharpener, pencils, coloured pencils, and craft materials for school projects, and may require more than one A4 notebook per year. Even if the children's school provides the above items at school, they are often not able to be taken home in order to complete homework to a satisfactory level. It is also not possible for children in different school years to split and share resources to a satisfactory level.

HBF believes that the current rate of £47.39 does not sufficiently reflect the needs of families with children – and it is not always possible for people who are on asylum support to use economies of scale. Families arriving to the UK to seek protection often arrive with nothing but the clothes on their backs and have to, for example, purchase full sets of clothing for each member of their household at once in order to ensure they are dressed appropriately for the weather conditions in the UK. They are exposed to high costs and are unable to shop around for cheaper alternatives. Families often don't have enough money to pay for books and other educational resources for children; due to limited funds they have to prioritise feeding their children over supporting their intellectual and social development.

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/598944/Applications-for-additional-support-v1\\_0.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/598944/Applications-for-additional-support-v1_0.pdf)

### 3. Asylum support in full-board accommodation

The £9.58 provided to those housed in full-board accommodation is inadequate to meet essential living needs. We understand that these payments were agreed in order to meet needs related to clothes, non-prescription medication and travel. See above regarding the current inadequacy of the Home Office's methodology and the amount provided to meet these needs for people who are in dispersal and full-board initial accommodation in terms of clothing, travel and medication

In addition, many people find the food provided in full-board accommodation difficult to tolerate. This is for many reasons, in part the repetition of the same food every day and the need to maintain a specific diet for health reasons, as well as the total lack of autonomy in having no money available for any kind of food chosen by the person themselves.

Clients have reported using the very small amount provided to buy basic staples, such as bread and eggs, in order to not have to eat as much of the food provided at the hotel, and of having to spend this money to buy food from outside, in order that their children will actually eat anything at all. Some clients who are traumatically separated from their families spend the entire weekly amount on calling their family for several minutes; in several cases, the family separation was a cause of chronic suicidality, and the person's limited contact with their family was the singular protective factor in terms of mitigating risk to themselves. Spending the very low full-board rate on this purpose, whilst vital for the person's mental health and family/private life, also means that people go hungry when they are not able to eat the hotel food; go without non-prescription painkillers when in pain; wear the same pair of clothes for months; and either walk to or are unable to attend essential appointments (in the latter case remaining in their hotel room for the majority of their time).

A client recently reported that he walks 40 minutes there and back to his local adult education college to study English; he walks because the full-board rate is not enough to enable him to afford the travel there. His classes are from 9am-5pm, three days per week, meaning that he misses breakfast and lunch provided at the hotel for each of these three days. Whilst this person attempts to integrate better into the UK and advance their understanding of English, they are significantly prohibited from doing so, and they arrive and leave college each day very hungry.

Other clients have reported fasting on specific days of the week, and have asked the hotel staff to save them a meal (which we understand is often issued in plastic containers, and should therefore be easy enough to set aside), for when they break their fast at 4pm. Hotel staff have declined to do this, telling them they must wait until the evening meal time at 6-7pm, leaving people choosing how to practise their faith, which is essential to their life (and often a protective factor in terms of their mental health) and going without two meals, or eating a (invariably inadequate) meal for lunch.

The psychological and material impact of the low amount of support is exacerbated by the length of time people remain in hotels. There are over 47,000 people in hotel contingency accommodation<sup>21</sup> and according to Home Office data, the average length of stay in initial/contingency accommodation before being moved to dispersed accommodation is 193 days – over 6 months.<sup>22</sup> Many of these people will be living off just over £9 a week.

**Recommendation:** The Home Office should review and increase accordingly the payment provided to those who have been granted support under section 95 or section 4 who are living in full-board initial accommodation. It should be clarified that people eligible for additional payments (e.g. £3 for pregnancy/child under five, £5 for child under one) should be paid automatically, and not require a separate request.

**Recommendation:** There is often a prolonged delay in a person being formally granted support under sections 95 or 4, and actually receiving an ASPEN card with payments (which are rarely backdated to the date the person was legally granted support), with much third-party advocacy required (in our experience) to chase the ordering and delivery of the ASPEN card. The Home Office should review the processes related to this.

**Recommendation:** The Home Office should urgently review the food provided to people living in full-board accommodation. Nearly all of our clients express significant concerns with the food provided, including, lack of cultural familiarity with the food provided; lack of variety; inadequacy to meet specific dietary/health requirements, and poorly prepared meals (including both the ingredients themselves, and meals arriving partially frozen).

### *Moving from full-board to non-catered dispersal accommodation*

When people are moved from full-board to non-catered dispersal accommodation, often after waiting a very long time to be moved to more settled accommodation, the amount credited to their Aspen card that week is only the full-board amount, even if, for example, they are scheduled to be moved to dispersal accommodation on the Monday of that week. This means that they then have only £9.58 in new, non-catered accommodation, and cannot afford to buy enough food, toiletries and other things that week. In our experience, it is necessary to notify the Home Office via Migrant Help that the person has successfully been moved to dispersal accommodation and will require the increased non-catered allowance from the following Monday. Whilst it is possible to receive an emergency voucher from the accommodation provider, this is inadequate for several reasons; there may not be time to request and receive this from the accommodation provider (particularly as it is not known when requesting this from Migrant Help if the voucher will be authorised by the Home Office, and its distribution then depends on the promptness of the specific accommodation provider and individual housing officer). Additionally, if their Aspen card is

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<sup>21</sup> [asylum-seekers-receipt-support-datasets-mar-2023.xlsx \(live.com\)](#)

<sup>22</sup> Shared with members of the Asylum Strategic Engagement Group Support Subgroup

then topped up the following week with a backdated payment proportioned for the week before – the week they moved to dispersal accommodation – that person will then have an overpayment, and have their support reduced over a longer period of time, for an entirely unavoidable purpose.

**Recommendation:** The Home Office should issue an automatic payment – proportioned for the days of the week in which the person will be in dispersal accommodation – for people moved from full-board to non-catered dispersal accommodation. Information on the KPIs for accommodation providers to notify the Home Office of a successfully completed dispersal should be published, and Aspen payments automatically made that same week (outside of the normal Monday schedule) on prompt confirmation of dispersal from the accommodation provider.

#### 4. Other concerns

##### *Emergency costs*

Whilst asylum support is meant to address destitution, the low rate means that people are constantly on the brink of not being able to feed themselves or their children, and meet their other basic needs, particularly when unexpected events happen which cannot be anticipated in advance. For example, clients with £20 uploaded to their Oyster cards, or who have recently purchased a week's bus pass, have then misplaced or had the card/ticket stolen, and then have gone hungry that week; both without the means to travel, and with no money in such a tight budget to afford anything extra.

For example, one client who suffered significantly during the summer heat wave of 2022; she was housed in dispersal accommodation, in a small room with no windows, and would simply not have been able to afford any item (e.g., a fan) which may have alleviated this situation in anyway. Fans are not an item required to be provided by the accommodation provider within the Standard of Requirements. However, during this heatwave, the Met Office issued its first red warning for extreme heat, it was declared a national emergency, and temperatures rose in some parts of the UK above 40 °C. It was warned that death and illness may occur among the fit and healthy at such temperatures, as well as in high-risk groups.

Similarly, we have been told by clients living in very cold rooms in hotels during December last year, who have no individual control of the heating or temperature of their room, that they are unable to afford additional blankets or warm clothes. Affording such items in receipt of the non-catered standard allowance would be difficult enough, but impossible for people receiving only the full-board rate.

Whilst the Home Office ostensibly makes some provision for additional costs this in that people can apply for additional support under Section 96(2) of the Immigration and Asylum

Act 1999, it is our position that this is inadequate when a need is urgent. To access support under section 96(2), people need to complete a further application form, requesting details and evidence of how all other sources that could meet this need have been explored and exhausted, and then await a response for issues which are often very time sensitive. The processing times for applications under section 96 are not known, nor is the evidential threshold. This option for additional support is therefore an unreliable, if not also inaccessible, option for many people seeking asylum.

**Recommendation:** The rate of asylum support should be increased as outlined above to enable people to better meet their essential needs and have flexibility to deal with emergency needs.

### *Inconsistency in payment amounts*

We have also noticed that sometimes people seeking asylum simply receive the wrong amounts of financial support. When querying this situation with Migrant Help, and where it has been ascertained that the lower payment is not due to a deduction made to recover an 'overpayment', we have been informed via Migrant Help that '*sometimes the wrong amounts just get paid.*'

**Recommendation:** The Home Office should only be able to issue a set number of standard amounts based on a person's circumstances that are published and for which the calculations are transparent and clear.

## Appendix I – Asylum support calculations

The 2022 figure allowed for the CPI inflation rate of 3.1% while the January 2023 figure includes the 10.1% inflation rate, following the High Court ruling in *R(CB) v Secretary of State for the Home Department [2022] EWHC 329 (Admin)*. In July 2023, the rate of support was increased to £47.39 for those in receipt of financial support only or housed in non-catered accommodation, and £9.58 for those in catered accommodation. This 5.31% increase is reflected in the below figures.

	2021	2022	January 2023	July 2023
Food and non-alcoholic drinks	£26.89	£27.72	£30.52	£32.14
Toiletries	£0.69	£0.71	£0.78	£0.82
Non-prescription medicines	£0.35	£0.36	£0.40	£0.42
Laundry/toilet paper	£0.43	£0.44	£0.49	£0.52
Clothing and footwear	£3.01	£3.10	£3.42	£3.60
Travel	£4.70	£4.85	£5.34	£5.62
Communications	£3.56	£3.67	£4.04	£4.26
<b>Total</b>	<b>£39.63</b>	<b>£40.86</b>	<b>£44.99</b>	<b>£47.39</b>