



Briefing ahead of Westminster Hall debate on asylum accommodation contract renewal, Wednesday 10 October, 2.30-4pm

On Wednesday 10 October, the renewal of asylum accommodation contracts will be debated in Parliament.

Freedom from Torture is concerned that the new contracts will not address the serious failings in the provision of accommodation for asylum seekers under the current COMPASS contracts.

This debate is a vital opportunity to ensure the new contracts are scrutinised and adequately meet the needs of asylum seekers and interests of the communities and local authorities within which they are housed.

This briefing should be read in conjunction with the [briefing supplied by Asylum Matters](#).

Freedom from Torture concerns:

1. The continued failure of the Home Office to adequately identify, record and share information on vulnerability, and the actions taken based on that information by the Home Office and the housing provider, demonstrate a disregard for the health needs and additional vulnerabilities of torture survivors.
2. Accommodation providers continue to supply housing that does not meet safety and quality standards, and fail to source accommodation which meets the basic requirements of their contracts.
3. The concessions for torture survivors in treatment with either Freedom from Torture or the Helen Bamber Foundation, specified within the Home Office 'Allocation of Accommodation policy', are not always applied correctly and consistently by caseworkers.
4. The Home Office continues to fail in its obligation to provide effective oversight of the provision of accommodation administered through COMPASS.
5. Inspection of accommodation is neither consistent nor effective and therefore fails to identify and remedy issues before they become serious and dangerous.
6. Complaints continue to be raised regularly but they are not adequately dealt with by accommodation providers.

Freedom from Torture is also concerned that the report of an inspection into the provision of asylum accommodation by the Independent Chief Inspector of Borders and Immigration, carried out in March and April 2018 and sent to the Home Office on 9 July, has yet to be published, despite a commitment to publish within 8 weeks of submission.

Key recommendations:

1. The Home Office and accommodation providers should work together more effectively to identify and meet the needs of particularly vulnerable asylum seekers, such as torture survivors, including through correctly applying the torture concessions within the Allocation of Accommodation policy.
2. The use of houses of multiple occupancy (HMO) should be reduced so that high numbers of asylum seekers are not sharing communal space. High density housing can create tensions and exacerbate existing mental health problems.
3. Accommodation providers should be required to report publicly on their Key Performance Indicators to ensure companies and their sub-contractors can be held to account. This should include what penalties have been issued in response to non-compliance.

4. A consistent inspection regime should be implemented across all Home Office-provided accommodation incorporating both the condition of the accommodation and the wellbeing of residents. We support the Home Affairs Committee call for the voices of residents to be heard through user groups which feed into the complaints and wider quality oversight processes.
5. The Inspection report by the Independent Chief Inspector of Borders and Immigration should be published and its recommendations taken into account ahead of the contracts being awarded.

Issue 1: Home Office fails to identify, manage and share information of vulnerability

In Freedom from Torture's experience the identification, recording, and sharing of information on vulnerability by the Home Office, and the actions taken based on that information by both the Home Office and the housing provider, are inadequate. The consequence is that survivors of torture are placed in inappropriate and, occasionally, dangerous accommodation that worsens their anxiety, undermines any sense of safety and hampers their rehabilitation.

In our experience, information on vulnerability and any associated special requirements, is not shared efficiently by UKVI nor acted on appropriately during the allocation of accommodation. On a number of occasions over the past year, we have submitted complaints or requested relocation on account of a property being unsuitable for the client.

Case Examples:

In one case, the client's physical health needs were not accounted for at all when he was housed by SERCO in Glasgow. The client moves with a walking stick, has been diagnosed with epilepsy, has frequently falls and faints on almost a daily basis. Despite this, the client was housed on the 14th floor of a high-rise building, with an elevator that only goes up to the 13th floor. This causes the client significant physical pain as he has to climb up and down two flights of stairs when entering and exiting his accommodation. Should there be a fire, the client would be at considerable additional risk as he would not be able to exit unassisted. The client has explained that he avoids going out because of the stairs and because he is worried he will faint or fall on them. This contributes to his social isolation and hampers his efforts to rehabilitate.

Another case that we began assisting in the summer of 2017 concerned a severely traumatised client who had experienced torture in Sri Lanka and was detained in the UK. He was given a room which did not have any windows but only a skylight. This was re-traumatising for the client as it reminded him of his detention and torture and resulted in a severe decline in his mental health to the extent that we were concerned that there was a high suicide risk. We made repeated representations to UKVI asylum support team but they refused to relocate him, stating that the medical evidence that we had submitted (including a report from our psychiatrist) was not adequate. The client eventually had to resort to legal action, but the matter was only resolved when he was granted refugee status and left his Home Office accommodation.

Issue 2: Failure to apply concession policy for torture survivors undergoing treatment when allocating accommodation

Asylum applicants accepted for treatment by either Freedom from Torture or the Helen Bamber Foundation should benefit from a policy concession which states that '*they should normally be provided with accommodation as close as possible to the centre where the treatment is to take place*'.¹ For persons who receiving treatment in London, this means that accommodation should generally be provided within travel zones 1-6. For persons receiving treatment at one of Freedom from Torture's regional or national centres, this means accommodation should be provided within one hour travelling distance of the centre.

¹ Allocation of accommodation policy, Home Office, version 5.0. 7 March 2017. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/597382/Allocation-Of-Accommodation-v5_0.pdf

The concession also requires caseworkers to note any special accommodation requirements indicated by either organisation and carefully consider any recommendations put forward. The concession states that, as a general rule, and wherever possible, persons receiving treatment by either organisation should not be required to share bedrooms with strangers. In exceptional cases, either organisation may also consider that self-contained accommodation or other special arrangements are clinically necessary for the person and notify the caseworker. It further states that, as a general rule, and wherever possible, these needs should be provided for. Any request to move a person from accommodation that either organisation considers is unsafe or unsuitable should be handled on an urgent basis.

Despite this, we continue to see a number of our clients placed in shared room accommodation, some of our London clients dispersed to areas outside of London travel zones 1 - 6 and a refusal by UKVI to engage with requests for special accommodation arrangements or relocation on therapeutic grounds.

Case examples:

Between December 2017 and February 2018, we had six cases of clients receiving treatment at our London centre being dispersed outside of London (most commonly to Tilbury in Essex) and three clients placed in a shared room. In one instance, we assisted a particularly vulnerable and traumatised man from the Democratic Republic of Congo who had been placed in shared room accommodation. In her supporting letter to the UKVI asylum support team, his therapist explained that the client suffers: PTSD (with symptoms including nightmares and waking at night while screaming); depression; auditory hallucinations; suicidal ideation and chronic pain. In this instance one of our welfare staff wrote to UKVI on three occasions and received no reply. The client was eventually relocated to appropriate accommodation approximately six weeks later, at the point that he was about to take legal action.

Our welfare staff intervened to assist another client, a 17 year old Afghan national, who was placed in shared room accommodation. He was eventually relocated to a single room accommodation approximately three months after our intervention. However, as a result, he was moved out of London, making his access to our centre and his solicitor very difficult, time consuming and incredibly expensive. This is causing him further distress and our welfare adviser was required to intervene on his behalf yet again to request relocation into zones 1-6 as per the concession.

Issue 3: Poor Information Sharing between the Home Office and accommodation providers

The policy concession noted above specifically prohibits caseworkers from asking for details of why Freedom from Torture considers that self-contained accommodation or other special arrangements are necessary, and they should not refer the case to the Home Office Medical Adviser. This suggests that they should accept the clinical authority with which we make a request for special arrangements and not challenge the adequacy of our evidence.

Even when a relocation request has been granted, we are concerned that information provided to UKVI concerning the reasons for the relocation is not always, or efficiently, communicated to the provider.

Case examples:

Freedom from Torture requested relocation for a client who was being accommodated on the first floor and struggled with the stairs on account of a disability that he had acquired because of an experience of torture. He was offered another first floor property and this had to be challenged by a community care solicitor.

Another client, accommodated in Middlesbrough by G4S, found herself on crutches after an operation to address severe back pain resulting from mistreatment by the military in her country of origin. She had been housed in a property that had stairs between her bedroom and the rest of the house. While in hospital, she requested relocation on physical health and mobility grounds, but was offered a property with exactly the same layout. She was even refused a chair for the bath as the provider argued that it would inconvenience the other occupants.

Issue 4: Personal safety & safeguarding duties

Our clients continue to report feeling unsafe while in their accommodation, mainly due to the absence of locks on the doors of their personal rooms and the obligation to live in close proximity with strangers. One client, accommodated by SERCO in Glasgow, is currently living with a flatmate who he believes is using illegal substances. The client described spending the majority of his time in his room because he feels unsafe, but continues to feel anxious because he does not have a lock on his door.

We also have considerable concerns about the safety of our clients and the extent to which housing providers take seriously their safeguarding responsibilities. In one case, we were unable to reach a client by telephone and were concerned as he was a potential suicide risk. The client's therapist contacted the housing manager at G4S and asked that he conduct a 'safe and well check' in accordance with the provider's safeguarding policy. She was told that he could not do this and that she would have to contact the company via their central system as he would need to take instruction from them. It was then extremely difficult for us to get through to the accommodation provider's central point of contact in order to arrange this and caused significant delay.

Issue 5: Ineffective inspection regime and poor complaints process

It is evident from the number, consistency and severity of the accommodation issues that we routinely deal with, that the inspection regime is failing to identify problems and ensure effective remedial action is taken. We have supported many clients over the past year to pursue complaints through their accommodation provider, regarding for example, facilities or the safety and wellbeing of our clients. We continue to document the ongoing failure of the complaints process to offer a prompt resolution to identified problems.

Throughout 2017 and to date, we continue to receive reports from clients of infestations (rodent and insect) and issues of disrepair that do not appear to be rectified in a timely manner. Our welfare staff have submitted a number of complaints to G4S and regarding clients' accommodation. The response has often been slow, if there has been any at all. In order to pursue even very simple requests, residents must often go through a complicated process involving the landlord, the managing agent and the housing provider, each of whom refers to the other. Other clients report seeing 20-30 housing officers within the space of three years. This means the same complaints need to be repeatedly raised and with such high staff turnover, issues are not dealt with and there is no institutional memory.