

Asylum Accommodation and Support Contracts (AASC):

A full guide to the contractual requirements for initial and contingency accommodation for people seeking asylum

Over the past 12 months, there has been an increase in the UK in the use of ‘contingency’ accommodation (additional accommodation intended to be for temporary use) to house destitute people seeking asylum. Such provision currently includes hotels, as well as two disused Ministry of Defence sites.

The Asylum Accommodation and Support Contracts (AASC) are clear that the use of contingency accommodation should in no circumstances vary the AASC contract in respect of the provision of services by accommodation providers (Schedule 5 para 5.4.7.c). Our understanding is therefore that **all** contingency accommodation should meet the standards set out in the Asylum Accommodation and Support [Statement of Requirements](#) for initial or full board accommodation. ***To date, there has not been any detailed guidance distributed publicly by the Home Office on this point.***

What’s this document for?

This document aims to set out the **contractual requirements in the AASC contract** for initial and full board accommodation. It is intended to be an easily accessible guide for advocates to better understand the specifications of the contract, and to enable them to use the contract to challenge inadequate provision.

Where we know of additional developments that have been put on the record by the Home Office or others, we have included them. Hyperlinks in this document link to sections with more detailed information on applicable contractual standards.

This document is based on contractual standards agreed between the Home Office and its accommodation providers and set out in the AASC [Statement of Requirements](#). The language used and standards agreed are not reflective of the views of Asylum Matters.

Who are Asylum Matters?

Asylum Matters is an advocacy project that works in partnership locally and nationally to improve the lives of people seeking asylum through social and political change. We have Campaigns Project Managers in the North West, West Midlands, Yorkshire and Humber, the North East, and Wales.

In 2019, Asylum Matters produced full guides on the AASC and AIRE contract requirements, as well as posters outlining key information. These resources can be accessed [on our website](#). You can also write to us at info@asylummatters.org for more information.

We are always interested to know if you are seeing systemic problems in asylum accommodation. Contact your regional campaign manager (if applicable) or info@asylummatters.org.

Last edited: 3 December 2020

Summary

This summary section provides top line information on basic contractual standards for initial and full board accommodation. Click on the hyperlinks to access more detailed information later in the document.

The **Asylum Accommodation and Support Contracts (AASC)** govern the relationship between the Home Office and the three companies contracted to provide asylum accommodation in the UK: Clearsprings, Mears and Serco. Detailed specifications on services to be provided are set out in the Statement of Requirements for the contracts, which can be found online [here](#).

The **Advice, Issue Reporting and Eligibility Contract (AIRE)**, governs the relationship between the Home Office and its contracted advice provider, Migrant Help. The AIRE Statement of Requirements can be found at online [here](#).

There is a close relationship between the two sets of contracts in the framework of support to people seeking asylum.

GENERAL STANDARDS AND MULTI AGENCY WORKING

- The Asylum Accommodation and Support Contracts (AASC) are clear that the use of contingency accommodation should in no circumstances vary the AASC contract in respect of the provision of services by accommodation providers.
- There is an obligation in the contracts for accommodation providers to liaise and cooperate with other actors, including the voluntary sector and including through participation in multi-agency forums;
- All asylum accommodation is always required to be safe, habitable, fit for purpose and correctly equipped;
- Accommodation for disabled Service Users, or Service Users with specific needs, should be fit for purpose and able to be used in compliance with relevant legislation;
- Accommodation providers [committed before the Home Affairs Select Committee](#) in May not to move newly arrived unrelated adults entering initial or contingency accommodation into shared bedrooms;

FOOD AND DRINK

- Fresh drinking water should always be provided;
- Breakfast, lunch, evening meals should be provided. For lunch and evening meals: at least one hot and one cold selection, a vegetarian option and a drinks service;
- A food service for babies and small children, enabling them to be fed whenever necessary, should be provided;
- Special dietary, cultural or religious requirements (including, without limitation, gluten free and diabetic options where necessary) should be met;
- Additional foodstuffs or meals should be provided as required to meet the nutritional needs of Service Users for whom three daily meals may be insufficient;
- The food service should meet appropriate nutritional standards for each varied menu and satisfy cultural, religious, health or other specific requirements;
- Providers must clearly advertise the availability of religious or culturally sensitive meals to relevant Service Users, where appropriate;
- The Provider shall ensure that each varied menu is validated by a suitably qualified nutritionist or health professional as being appropriate to the dietary needs of Service Users.

PERSONAL CLEANLINESS AND HYGIENE

- New personal linen for each service user;
- Reasonable access to laundry facilities;
- Personal toiletries to be provided, including feminine hygiene products.

BABIES AND CHILDREN

- Baby care equipment and disposable nappies must be provided; Facilities to allow sterilisation of equipment for babies and children must be provided;
- Where applicable, childcare equipment including cots and high chairs should be provided.

CASH SUPPORT

- The provision of cash support to people seeking asylum is not governed by the AASC contract. Up until November 2020, there had not been standard provision in respect of cash support provided to people in contingency accommodation. In some cases, where additional support items (baby care equipment, disposable nappies, personal toiletries and feminine hygiene products) have not been provided by accommodation providers, we are aware that a small amount of cash has been provided to residents in lieu of these items. This has not been consistent across facilities.
- At the end of October, a Ministerial letter reported on [here](#) set out proposed changes to asylum support: including plans for an allowance for people in full board accommodation facilities. It committed to a weekly cash payment of £8 for people in full board, and some further backdated payments to cover clothing (£3 a week backdated until March) and travel (£4.70 a week backdated until July). *There is as yet no further public information on how these payments will be administered / implemented.*

INDUCTIONS

- Inductions should be provided within one calendar day by the accommodation provider. This should include orientation in the accommodation, signposting to AIRE (Migrant Help), but also to local VCS services and legal advice, and information on how to make complaints;
- Migrant Help, the advice provider, also have an obligation to provide an induction within one calendar day. This is happening by telephone in most contingency sites. It should assist the person to apply for asylum support and give information on relevant local support networks and voluntary sector and community-based organisations which are available to offer assistance in the local area.

STAFF TRAINING AND BEHAVIOUR

- Accommodation providers have an obligation to treat all Service Users and their dependents in a polite and courteous manner which recognises their rights as individuals;
- All staff in contact with service users (including volunteers and sub-contractor agents) must be adequately trained.

RELOCATION AND DISPERSAL

- Service users should not be moved more than once whilst they are in initial accommodation, except for health and safety reasons;
- Accommodation providers should be providing further briefings to Service Users at least five days before dispersal.

HEALTHCARE AND MANAGEMENT OF COVID-19

- Providers are required to agree and acknowledge that the safety and security of the Service Users in their care is of absolute importance and must not be jeopardised, and that they are responsible for the general welfare of Service Users in their care;
- Providers have an obligation to liaise with the Home Office, Migrant Help, relevant health authorities, including contacts from Public Health, in the management of infectious or contagious diseases;
- Providers must take necessary action to protect the welfare of a Service User with an infectious or contagious disease, as well as other Service Users, their staff and members of the public, seeking guidance from relevant medical or public health professionals if necessary;
- The provision of healthcare services specific to asylum accommodation is not a requirement under the AASC contracts, and it is our understanding that it is for specific Clinical Commissioning Groups (CCGs) to consider how to configure services if contingency accommodation is procured within their area.

ADULTS AT RISK

- The Accommodation Providers are required to be proactive in monitoring and identifying people with specific needs or at-risk Service Users within their care;
- The Providers also must be proactive in making referrals to relevant statutory and/or voluntary services for an assessment of Service User needs, where appropriate.

COMPLAINTS

- Accommodation Providers are to encourage Service Users to make complaints through Migrant Help;
- Accommodation Providers have five working days to respond to and resolve Service User's complaints after a referral from Migrant Help;
- Migrant Help are also responsible for escalating complaints if a Service User informs them that a complaint has not been resolved to their satisfaction;
- Where the Accommodation Providers are informed of a complaint directly by Service Users during property visits, the accommodation providers are required to notify Migrant Help of the complaint on the same day, including the substance of the complaint and the name and contact details of the Service User making the complaint, where known. They are then responsible for responding to and resolving the Service User's complaint within five working days.
- Migrant Help's complaints procedure is [here](#).

ACTIONS YOU CAN TAKE TO ESCALATE ISSUES:

Contact [Migrant Help](#) to make sure that concerns around asylum accommodation are put on the record, not lost in the system, and fed into performance management information collated by the Home Office. If an individual wishes to make a complaint, this can be done [via Migrant Help](#) and accommodation providers should deal with it within five working days;

Work with multi-agency groups, other advocates, and organisations such as Local Authorities and Regional Strategic Migration Partnerships to make sure concerns are escalated with the accommodation providers. Both the accommodation providers and [Migrant Help](#) have partnership teams who should engage with local organisations seeking to point out issues or better provision;

Work together with local Councillors and MPs to bring issues to their attention, get them to take action or use the media to get issues heard. Organisations like [Imix](#) work to support groups looking to make media approaches. We are always interested to know if you are seeing systemic problems in asylum accommodation, and if you have been in touch with your elected representatives or the media: contact your regional campaign manager (if applicable) or info@asylummatters.org

Section 1 – General Standards and Multi-Agency Working

CONTRACTUAL STANDARDS

Our understanding is that accommodation provided as contingency accommodation must meet the standards expected of the accommodation providers set out in the [Statement of Requirements](#) for the Asylum Accommodation and Support Contracts – and specifically the standards in that document which apply to full board accommodation and initial accommodation (Schedule 5 para 5.4.7.c).

References in this briefing are to paragraphs in the AASC [Statement of Requirements](#). For a wider explanation of the AASC contracts, as they apply across the accommodation estate, we have produced a document [The Asylum Accommodation and Support Contracts – A Guide](#).

MULTI AGENCY WORKING

Accommodation providers have an obligation under the contracts to liaise and cooperate with the voluntary sector; Local Authority organisations; the Home Office’s regional offices; other Providers (including Migrant Help); the National Health Service; and the Police, during the normal course of operations “so that the interests of the Service Users are best served” (1.5.1) The Statement of Requirements specifies that this will include, but not be limited to, participation in multi-agency forums or meetings, as required, to protect and safeguard the welfare of Service Users (1.5.2).

In practice, this has in many areas translated to the setting up of multi-agency forums in local areas where people seeking asylum are accommodated. Where such groups have not existed, many voluntary sector agencies have worked with local authorities and accommodation providers to create them, many specific to sites being used as contingency. **These forums can be useful for coordinating voluntary sector activity around sites, raising operational and other issues which are specific to the hotel and getting concerns put on record.**

ACCOMMODATION STANDARDS - GENERAL

All asylum accommodation is required at all times to be **safe, habitable, fit for purpose and correctly equipped** (2.1.1 AASC [Statement of Requirements](#)). It must be licensed for the intended use in accordance with statutory requirements and/or Local Authority rules and regulations, where the property is subject to licensing (4.1.1.d). There are detailed specifications on what constitutes safe, habitable, fit for purpose and correctly equipped which are explained in Annex B to the [Statement of Requirements](#) (p81) or [this poster](#) we have produced to explain them. If you don’t have a copy of this, and would like one, contact us at info@asylummatters.org.

DISABLED PEOPLE OR SERVICE USERS WITH SPECIFIC NEEDS

All accommodation should be suitable for Service Users with specific needs, as notified by the Home Office or where identified as necessary by the Provider, and in compliance with the Disability Discrimination Legislation; (4.1.1.g). Accommodation for disabled Service Users, or Service Users with specific needs, should be fit for purpose and able to be used for its intended purpose by disabled Service Users, in compliance with relevant legislation, including the Human Rights Act 1998 and the Equality Act 2010 (B.5.1). In providing accommodation for disabled Service Users, and/or Service Users with specific needs, the Provider shall ensure that the accommodation and its associated facilities are accessible, and, where necessary, has appropriate adaptations to enable the Service User to live independently, or in accordance with a Local Authority assessment under the Care Act 2014 (B.5.2).

ROOM SHARING

Annex C of the [Statement of Requirements](#) set out detailed provisions on room sharing. Bedroom sharing of unrelated adults of the same sex is only permitted under certain circumstances in the asylum accommodation contracts. In addition, providers must ensure that where shared rooms are used, they are appropriately sized for the number of occupants and that occupancy of a room does not exceed that specified in the appropriate space standard, as set out in relevant legislation and/or in Local Authority licensing requirements; (B.12.1.1).

However in May 2020, all the asylum accommodation providers [confirmed before the Home Affairs Select Committee](#) that new arrivals into initial or contingency accommodation estate would not be placed in shared rooms with unrelated adults, as a result of the COVID-19 pandemic.

The placing of individuals in large shared dormitories or military barracks does not meet this commitment. **We also do not have a clear picture on whether this commitment is being adhered to in practice across providers and regions** elsewhere in the accommodation estate. If you are aware of places in which unrelated adults are being required to share rooms in initial or contingency accommodation, particularly people who have entered the asylum accommodation system since May 2020, please do let us know (email info@asylummatters.org).

COMMUNAL AREAS

Unless otherwise stipulated, Service Users shall have equal and necessary access to facilities (B.12.1.3).

Providers must ensure that common and communal parts of the accommodation are kept clean (B.12.1.7). They are obliged to provide access to appropriate cleaning materials and consumables for communal areas, including, but not limited to bleach, floor cleaner, washing up liquid and worktop cleaner (B.13.1). ***We have not had clarification specifically on how COVID-19 may affect this***

Taking into account the number and mix of Service Users, the Providers are obliged to provide reasonable access to tables and comfortable chairs for recreational activities (B.13.1). ***We have not had clarification specifically on how COVID-19 may affect this.***

Section 2 – Food and Facilities, Personal Cleanliness and Hygiene

FOOD AND DRINK

Most sites currently being used as contingency accommodation are **full board accommodation**. Detailed specifications on what is required in this case are set out at paragraph 4.1.4 of the [Statement of Requirements](#) (page 46). For full board accommodation, the Provider is required to take into account the number and mix of Service Users and provide adequate dining facilities to cater for their needs (B.13.1). ***We have not had clarification on how specifically COVID-19 may affect this.***

Providers are obliged to provide reasonable access to **fresh drinking water** and a suitable drinking vessel at all times (B.13.1).

The required food provision is:

- **Breakfast** (4.1.4.3.a)
- **Lunch and Evening meals** (4.1.4.3.b).

For both lunch and evening meals there should be a choice of at least **one hot** and **one cold** selection, and **at least one vegetarian option**, and a beverage service (**drinks**) should be available with each main meal (4.1.4.3.c).

In addition, there should be:

- a **food service for babies and small children with the appropriate foodstuffs. This should enable babies and small children to be fed whenever necessary;** (4.1.4.3.d)
- options which cater for **special dietary, cultural or religious requirements (including, without limitation, gluten free and diabetic options where necessary);** (4.1.4.3.e) and
- **additional foodstuffs or meals as required to meet the nutritional needs of Service Users for whom three daily meals may be insufficient;** (4.1.4.3.f)
- The food service should meet **appropriate nutritional standards** for each varied menu and **satisfy cultural, religious, health or other specific requirements**. Providers have to **clearly advertise** the availability of religious or culturally sensitive meals to relevant Service Users, where appropriate; (4.1.4.3.4)
- The Provider shall **ensure that each varied menu is validated by a suitably qualified nutritionist or health professional as being appropriate to the dietary needs of Service Users** (4.1.4.3.5).

Providers should take proactive steps to try and ascertain whether a Service User has specific dietary needs, and should notify the Home Office if a Service User has dietary needs which have not previously been identified, as soon as practical (2.3.7)

PERSONAL CLEANLINESS AND HYGIENE

Bathrooms

There must be at least one bathroom per 5 single service users in full board accommodation (B.13.1) ***We have not had clarification specifically on how COVID-19 may affect this.***

Personal Linen

As a minimum, there should be new personal linen for each service user. The Statement of Requirements specifies 2 bath towels, 2 hand towels, 2 face flannels, 1 tea towel, 2 sheets, 2 pillows / pillow cases, 2 blankets, 1 duvet and 2 duvet covers (B.13.2)

Laundry

There should be reasonable access to laundry facilities (over and above hand washing, normally a washing machine), ironing boards and clothes irons. Laundry should include facilities to enable Service Users to dry clothes e.g. an airer or a clothes line (B.13.1)

Toiletries

Providers are required to ensure that the full board service shall include additional support items required by Service Users, including **personal toiletries** (4.1.4.3.6b) There is no detail in the contracts as to what is considered adequate toiletries, however it does stipulate that this must include feminine hygiene products (4.1.4.3.6b).

Women

Women must be provided with feminine hygiene products. (4.1.4.3.6b).

BABIES AND CHILDREN

The full board service must include **baby care equipment and disposable nappies**; (4.1.4.3.6a)

Providers must provide facilities to allow the sterilisation of equipment for babies and children. (B.13.1). Where applicable, childcare equipment including cots and high chairs should be provided, and it should be ensured that sterilisation equipment is available for children under the age of one year (B.12.2).

CASH SUPPORT

The provision of cash support to people seeking asylum is not governed by the AASC contract. Up until November 2020, there had not been any standard provision in respect of cash support provided to people in contingency accommodation. In some cases, where additional support items (baby care equipment, disposable nappies, personal toiletries and feminine hygiene products) have been provided by accommodation providers, we are aware that a small amount of cash has been provided to residents in lieu of these items. This has not been consistent across facilities.

At the end of October, a Ministerial letter reported on [here](#) set out proposed changes to asylum support: including plans for an allowance for people in full board accommodation facilities. It committed to a weekly cash payment of £8 for people in full board, and some further backdated payments to cover clothing (£3 a week backdated until March) and travel (£4.70 a week backdated until July). *There is as yet no public information on how these payments will be administered / implemented.*

Section 3 – Support to Service Users, Induction, Relocation, Staff Training

INDUCTIONS

Accommodation providers

The [AASC Statement of Requirements](#) sets out detailed information regarding the induction that people should expect in Initial Accommodation from accommodation providers. With reference to Initial Accommodation, the focus of the induction given by accommodation providers shall be, as a minimum (2.7.2):

- the accommodation provided;
- individual safety and wellbeing, including access to urgent or emergency healthcare;
- the lay-out and routine of the Initial Accommodation centre and available services;
- the operating instructions for equipment, facilities and installed items provided for comfort and general living (where applicable);
- the process for accessing health screening and related services;
- the rights, obligations and responsibilities of Service Users whilst they are within the asylum support system; and
- signposting to the AIRE Provider (Migrant Help)

Paragraph 4.2.2 of the [Statement of Requirements](#), gives very detailed information on induction briefings (not all of which is replicated here). Some points of interest are that induction briefings should be provided by accommodation providers within one calendar day of the Service User occupying the Initial Accommodation (4.2.2), in a language understood by the Service User (4.2.2.2), and that at the end of the briefing, the Service user should be provided with an information pack containing all necessary information (4.2.2.4). The should include information on local services and information to assist Service Users to make contact with local organisations, including voluntary sector services and other independent advice providers (4.2.2.6.h), legal advisers and related services (4.2.2.6.h) and relevant information on local authority services, emergency services and local shops and amenities (4.2.2.6.h). It should also include information on how to make complaints (4.2.2.7). The Provider should require Service Users to confirm in writing that this information has been provided, an information pack issued and its content understood (4.2.2.9).

Migrant Help

Migrant Help, the contracted advice provider, are also required to give inductions to Service Users under the related Advice Issue Reporting and Eligibility contract (AIRE), within one calendar day of a person arriving in initial accommodation. Detailed specifications as to what is required within this induction is in paragraph 4.4 of the [AIRE Statement of Requirements](#).

A guide we produced to the AIRE contract is [here](#). Inductions are currently only happening by telephone in most contingency sites due to COVID-19. Amongst the things which this induction should contain are information about the availability of legal advice and representation and signposting to the legal aid agency (4.4.4.4 [AIRE SOR](#)); information about how to make complaints about the accommodation provider, Migrant Help or the ASPEN provider (4.4.4.10 [AIRE SOR](#)); and information about local support networks and voluntary sector and/or community based organisations which available to offer assistance in the local area (4.4.4.12 [AIRE SOR](#)).

A crucial function of Migrant Help for people in contingency accommodation is to assist them to apply for asylum support, including Section 95 support. We do not cover that function here, but detailed specifications on it are to be found in the [AIRE Statement of Requirements](#) Section 3 (Eligibility) and further explained in [our guide](#).

STAFF TRAINING AND BEHAVIOUR

The set-up of staffing at the sites is complex, with accommodation providers often subcontracting to security firms to help staff the sites, as well as hotel staff being involved in catering and cleaning. However the AASC [Statement of Requirements](#) does include provisions related to the behaviour of staff towards people seeking asylum, as well as the training of sub-contractor agents and provider staff.

Providers and their subcontractors and employees are required to treat “all Service Users and their dependents in a polite and courteous manner which recognises their rights as individuals”. They are required to acknowledge and agree “that Service Users will need to be managed with sensitivity, compassion and respect” (1.2.1.2). In particular, they are required to “understand the background and needs of the Service User and understand that some Service Users will have particular characteristics and special needs that require the provision of particular accommodation or accommodation in a specific locality, and/or the provision of transport that is suitable for their needs” (1.2.1.1)

The [Statement of Requirements](#) says that Providers “shall fully equip and train staff (including volunteers) to ensure they are able to fulfil their roles” (1.2.3.1). They must ensure that staffing levels are appropriate at all times (1.2.3.2). All staff, including sub-contractor agents must be DBS checked (1.2.3.3). All staff likely to have direct contact with Service Users, or access to their data, must have passed immigration and right to work checks, and have been made aware of the requirement in section 55 of the Borders, Citizenship and Immigration Act 2009, of the need to safeguard and promote the welfare of children (1.2.3.4).

All staff in contact with service users (including volunteers and sub-contractor agents) have to be adequately trained in compliance with the following requirements (1.2.3.7 and 1.2.4): the asylum and asylum support systems; equality and diversity; data protection; and safeguarding. (1.2.4.1).

In addition, the training programme for staff with regular or face-to-face contact with Service Users, and/or responsibility for the safety and security of Service Users and dependent children, must cover, as a minimum, the following: ethnic diversity and cultural awareness; suicide and self-harm awareness and prevention; basic first aid; gender based violence; fire safety; health and safety; vicarious trauma; unconscious bias; counter terrorism; modern slavery; training relating to required housing standards and relevant regulatory requirements; and any other relevant training as specified by the Home Office (1.2.4.2).

This training should take account of established good practice and relevant standards (1.2.4.3) and all staff should receive refresher training annually (1.2.4.4).

All staff must display clear and unambiguous identity cards when in contact with Service Users (1.2.3.9).

RELOCATION AND DISPERSAL

Service users should not be moved more than once whilst they are in initial accommodation, except for health and safety reasons (C.3.2). Accommodation providers should be providing further briefings to Service Users at least five days before dispersal (4.2.2.9).

Section 4 – Healthcare and Management of Covid-19

HEALTHCARE

The provision of healthcare services specific to asylum accommodation is not a requirement under the AASC contracts, and it is our understanding that it is for specific Clinical Commissioning Groups (CCGs) to consider how to configure services if contingency accommodation is procured within their area.

However, as a general principle, Providers are required to agree and acknowledge that the safety and security of the Service Users in their care is of absolute importance and must not be jeopardised, and that they are responsible for the general welfare of Service Users in their care (1.2.1.9). They must provide decent conditions, to the extent that this is within their power, for Service Users and meet their needs, including in respect of facilitating access to health and social care (1.2.1.9). They are required to liaise with health contacts (including, as a minimum, contacts from health care, social care and Public Health) in their area, at least once every quarter, so that local issues can be discussed, and appropriate actions identified (1.7.1). They are also required to liaise with health contacts in their area to help Service Users to access and take up health screening whilst they are in Initial Accommodation (1.7.3).

They have an obligation to pass any health information on Service Users within Initial Accommodation that has been made known to them to a relevant healthcare provider and staff responsible for the health screening of Service Users, so that health care for the most vulnerable new arrivals can be prioritised and acted upon without delay (1.7.9). In Initial Accommodation there is a requirement for space to be provided in or near the facility if required by the local health authority for the purpose of healthcare screening (4.2.1). ***We have had no information on how this is required to translate to contingency asylum accommodation.***

Providers also have a clear specific obligation to provide direct support to Service Users in certain circumstances. Where a Service User is taken ill during Service provision, the accommodation provider has to ensure that access to medical treatment is made available (including, if required, the attendance of appropriate medical staff), and if necessary shall take the Service User to hospital (1.4.3). They are required to notify the Home Office as soon as possible from taking the decision to provide access to medical treatment or to take a Service User to hospital (1.4.3). Annex D of the [Statement of Requirements](#) details examples of urgent health needs or pre-existing medical conditions which may require action by accommodation providers.

MANAGEMENT OF COVID-19

There has not to date been any detailed written guidance that we are aware of distributed publicly by the Home Office on how it is managing Covid-19 within the asylum accommodation estate. The [Home Office in the media blog](#) contains some limited information on the use of temporary hotels to house people during COVID-19.

The AASC contracts have some general provisions around health and safety and the management of infectious diseases. Providers under the contracts are under an obligation to provide the Home Office with a health and safety plan (1.3.2) to be reviewed at least annually. As far as practical, the Home Office shall notify the Provider if a Service User is suffering from an infectious or contagious disease before the Service User enters the care of the Provider, or as soon as possible after they are made aware (1.3.3). In these instances, the Provider must ensure that suitable arrangements are made to ensure that such Service Users are accommodated, supported and transported in line with Home Office instructions, and/or the instructions of a relevant and suitably qualified health professional (1.3.3).

If a Provider becomes aware that a Service User is suffering from an infectious or contagious disease, and the Service User has not been brought to the attention of the Provider by the Home Office, they have to notify

the Home Office and the AIRE Provider (Migrant Help) immediately, as well as the relevant public health organisation, where necessary (1.3.4). Prior to receiving instructions from the Home Office about the accommodation, support and transport of the Service User in question, the Provider should take necessary action to protect the welfare of the Service User, other Service Users, their staff and members of the public, seeking guidance from relevant medical or public health professionals if necessary (1.3.4).

We are aware that in some initial accommodation / contingency sites outbreak management plans have been drawn up with public health officials. To our knowledge, these have not been made public.

Section 5 - Adults at Risk or With Specific Needs

For the purposes of the accommodation contracts, an adult at risk or with specific needs is defined as “a person aged 18 years or over who is, or may be: in need of community care services by reason of mental or other disability, age or illness (Annex G G1.1.); and unable to take care of themselves or unable to protect themselves against significant harm or exploitation (G.1.2); or at risk of self-harm or suicide (G.1.3); or a victim of modern slavery (G.1.4). This definition and some of the indicators that may identify adults at risk are set out in Annex G to the Statement of Requirements. Indicators listed (not exhaustive) include: Threats of suicide/self harm; Domestic violence/ gender based violence; Victim of Modern Slavery; Female Genital Mutilation; Lesbian, Gay, Bi-sexual, Trans and Intersex ; Mental Health conditions; Physical Disability; and victims of torture or degrading and inhumane treatment (G.G.2).

The Accommodation Providers are required to be proactive in monitoring and identifying people with specific needs or at risk Service Users within their care (1.2.1.5 and G3-G.5). The Providers also must be proactive in making referrals to relevant statutory and/or voluntary services for an assessment of Service User needs, where appropriate (1.2.1.5). They have to ensure that guidance and training provided to staff regarding the identification and management of vulnerable Service Users with specific needs, or at risk Service Users, is kept up to date and aligns with accepted good practice (1.2.5.3).

The Providers have to respond appropriately to the needs of at risk Service Users or Service Users with specific needs in their service delivery, to assure their safety and wellbeing. This includes (but is not limited to):

- referring Service Users at risk or with specific needs to relevant Local Authority teams for a care and support assessment, under the Care Act 2014 (or Social Services and Wellbeing (Wales) Act 2014 or Social Care (Self-Directed Support) (Scotland) Act 2013, as applicable);
- liaising with relevant Local Authority teams to facilitate the transfer of Service Users into Local Authority care, where this has been determined by the Local Authority as the most appropriate course of action following the care and support assessment for the Service User;
- liaising with relevant Local Authority teams to help facilitate the provision of Local Authority care and support services to Service Users within Provider Accommodation, for whom such care and support has been deemed appropriate and necessary by the Local Authority, including providing access to the Service User’s Accommodation to relevant Local Authority or health provider staff;
- participating in multi-agency forums, as required, to support the safeguarding and wellbeing of Service Users with specific needs, or at risk Service Users;
- implementing appropriate inspection and reporting procedures necessary to assure the safeguarding and wellbeing of Service Users with specific needs, or at risk Service Users; and
- maintaining complete and auditable records demonstrating how the Provider has considered and responded to the circumstances and needs of Service Users with specific needs, or at risk Service Users (1.2.5.4)

They have to ensure that guidance and training provided to staff regarding the identification and management of vulnerable Service Users with specific needs, or at risk Service Users, is kept up to date and aligns with accepted good practice, and that they have sought input from the Home Office to ensure their guidance and materials align with the Home Office’s safeguarding strategy (1.2.5.3).

Section 6 – Complaints

The [AASC Statement of Requirements](#) states that the Accommodation Providers are to encourage Service Users to make complaints through Migrant Help (H.5.2). They have an obligation to signpost to Service Users the ways and means for them to provide feedback or make a complaint via Migrant Help, including by ensuring the number to call is clearly displayed in a place which is visible and accessible, and demonstrating the process as and when necessary (4.4.2).

When a Service User reports a complaint to Migrant Help, Migrant Help should: classify and record the complaint and refer it to the Accommodation Provider for resolution within thirty minutes of being reported. ([AIRE Statement of Requirements](#) Annex A and 5.2.3). The Accommodation Provider is then responsible for responding to and resolving the Service User's complaint within five working days of receiving the referral. Within one working day of the referral, they should set out to the Service User, any action which will be taken to resolve the complaint, and when they intend to complete this action. They also must notify Migrant Help of this information, also within one working day. ([AASC Statement of Requirements](#), 4.4.2.5).

Any complaint which is not able to be resolved to the satisfaction of the Service User has to be referred by the Accommodation Provider to Migrant Help, who shall advise the complainant and if necessary, take up the complaint on their behalf. ([AASC Statement of Requirements](#) 1.2.7.4). Migrant Help are also responsible for escalating complaints if a Service User informs them that a complaint has not been resolved to their satisfaction. ([AIRE Statement of Requirements](#) 5.2.5.2). We include further information on this in [The Advice Issue and Eligibility Contracts – A Guide](#).

Where the Accommodation Providers are informed of a complaint directly by Service Users during property visits, the accommodation providers are required to notify Migrant Help of the complaint on the same day, including the substance of the complaint and the name and contact details of the Service User making the complaint, where known. They are then responsible for responding to and resolving the Service User's complaint within five working days of receiving the complaint from the Service User ([AASC Statement of Requirements](#) Annex H H.5.3). Migrant Help's complaints procedure is [here](#).

Other Actions You Can Take to Escalate Issues:

- Contact [Migrant Help](#) to make sure that concerns around asylum accommodation are put on the record, not lost in the system, and fed into performance management information collated by the Home Office. If an individual wishes to make a complaint, this can be done [via Migrant Help](#) and accommodation providers should deal with it within five working days;
- Work with multi-agency groups, other advocates and organisations such as Local Authorities and Regional Strategic Migration Partnerships to make sure concerns are escalated with the accommodation providers. Both the accommodation providers and [Migrant Help](#) have partnership teams who should engage with local organisations seeking to point out issues or better provision;
- Work together with local Councillors and MPs to bring issues to their attention, get them to take action or use the media to get issues heard. Organisations like [Imix](#) work to support groups looking to make media approaches.

We are always interested to know if you are seeing systemic problems in asylum accommodation and if you have been in touch with your elected representatives or the media: contact your regional campaign manager (if applicable) or info@asylummatters.org.