

Written evidence submitted by the Scottish Refugee Council

Recommendations

We ask the committee to recommend

- That the UK Government delays any extension of the Compass contracts until it has fully considered what this committee recommends in its inquiry report and not extend until it has responded to the committee with its conclusions.
- That regular and independent inspection is built into any extended Compass contracts as well as in any post-2019 approaches to providing this public service of housing to people seeking refugee protection.
- That refugee voice is integral to an extended contract as well as in post-2019 approaches. The performance of whoever is responsible for the service must be measured, at the very least, through a KPI on how well it involves refugees and improves practice as a result.
- That the National Audit Office conducts a social impact analysis of Compass dispersal and that such analysis should not be limited to Home Office Compass budget lines and their "savings" but to consider the extent of displacement of responsibility and cost shunting.
- That an independent advocacy service is built into any extended contracts for Compass in 2017-2019 and any approaches to this public service post-2019. This should build confidence amongst those involved in this public service and help to prevent unfunded cost shunting.
- Whether the public interest is being served in relation to accessing information on the Home Office's and its contractors' performance under Compass and, if the committee concludes it is not, make a recommendation that the Information Commissioner conduct an audit.
- That the UK Government give an undertaking not to enforce asylum dispersal on local authority areas pursuant to its power at s101 (3) of the 1999 Act. This builds trust with local authorities, constitute a partnership of equals, and help voluntary agreements be reached.
- That any extended contracts and post-2019 policy for this public service of housing have at their centre, gender, equalities and the particular needs or vulnerabilities of refugees stemming from torture, exploitation and psychological trauma.
- That the Equality and Human Rights Commission consider whether the Home Office and its contractors have, in designing and delivering this public service since 2012, had "due regard" to the public sector equality duty at s149 in the Equality Act 2010.
- That the UK and Scottish Governments have a working-level agreement on asylum dispersal. This should cover the dispersal process relating to Scotland; give an oversight role to Scottish ministers; and involve all key sectors: health, legal, local government, education and NGOs.

Executive summary

- World events have led to a massive forced displacement of peoples including those seeking protection in Europe and the UK. Compass was designed for 2011 not 2017. It is premised on an asylum population in the 20-25,000 range not for the 35-40,000 range of today. Compass was also designed with fewer local authority areas in mind than is required now.
- Compass is near the end of its 5 years. For that reason alone it should be reviewed by an independent body before any decision is taken to extend into 2019. An automatic extension would be disrespectful to the UK parliament, premature and constitute poor public policy. If the UK government insist in extending they should do so with a commitment to consider the committee's recommendations and to report to them the outcome of that consideration.
- Compass is the largest of the Home Office's asylum contracts but is has lacked any independent scrutiny since 2014 and this was largely related to transition issues rather than ongoing delivery. Part of its rationale was to reduce the number of providers but it has had the opposite effect with many sub-contractors and individual landlords involved in multiple contractual and leasing agreements.
- Through outsourcing, this public service has become largely unaccountable, particularly in terms of an independent scrutiny gap that has existed since 2014. Compass has led to ever-more impenetrable housing supply chains in relation to which it is very difficult to locate precise responsibility. We agree with much of the written evidence submitted to the inquiry that there is a need for regular independent inspection of this public service of housing.
- Just as the Home Secretary is trying to widen asylum dispersal her policy for implementing this – Compass – has corroded the confidence of many local statutory bodies and communities to be asylum dispersal areas. This undermines her in persuading more local authority areas to take in refugees seeking protection. Unless the Home Secretary gives some control or oversight to local and country-level institutions on asylum dispersal it is hard to see a sufficient increase in dispersal areas.
- We urge the Home Secretary to recognise Compass in its current form lacks support amongst those involved in it albeit for different reasons. Local authorities and devolved governments should have at the very least formal oversight of dispersal in their areas. In Scotland that means an inter-government working level agreement that empowers Scottish ministers to practically oversee the reception and integration of those dispersed through the country and to be empowered via the agreement to intervene where and when necessary.
- Compass is a largely gender and equality-blind contract. But it is a public service of the utmost importance to a population - people seeking refugee protection – who the Home Office know often have multiple, complex needs stemming from histories of persecution, exploitation and trauma. Many of the needs are gendered such as sexual violence. The Home Office as a public authority, as well as its three contractors who are the bodies exercising this public function, must pay "due regard" to the public sector equality duty at s149(1) and (2), respectively, in the Equality Act 2010. If they cannot evidence "due regard" then the Home Office and its contractors may have been running this public service in an unlawful manner, at least in terms of the public sector equality duty. We ask the Committee to recommend that the Equalities and Human Rights Commission look into this matter.

- There have been frequent and critical reports in the media from across asylum dispersal areas in the UK of delivery of the Compass contracts, including in Scotland and Glasgow. Many of these reports reflect Scottish Refugee Council's experiences. We were unsurprised but nonetheless very concerned that many of our adverse experiences are reflected in much of the written evidence that has been provided to the committee by other agencies.
- Scottish Refugee Council published [The Extent and Impact of Asylum Accommodation Problems in Scotland](#) in 2014. This report identified three broad types of problems in Compass: (i) physical standards, (ii) the treatment of people by provider staff; and (iii) in planning, contract management, and stakeholder relationships. We made recommendations to the Home Office and its contractor. Nearly all of these have not been taken up.
- We have seen some improvement in terms of stakeholder relationships, on the part of Serco specifically, but we have not seen any improvement in the physical standards of housing; in how people are treated by some staff; or in terms of forward planning and aspects of contract management. We welcome the increase in Home Office inspections but, again, we have not picked up any notable improvement in the actual quality of the dispersal housing especially at the point when someone is moved in. This must be the success measure as to whether more inspections are having the intended effect or not.
- There have been at least three shifts in dispersal patterns to and within Glasgow since the contracts started: (i) numbers have nearly tripled since 2012; (ii) people are increasingly scattered across the city and nearly always now into private rented stock; and as a result of this and in the absence of any requirements to have wraparound services in the contract we are (iii) identifying far more social isolation for the women, men and children dispersed to the city, than has ever been the case since Glasgow became an asylum dispersal city in 2000.
- From our liaison with NGOs, community-based organisations and local statutory bodies in Glasgow, we have found those newly dispersed to the city are not always getting the initial accommodation services as is required in the contract, either when they should be or at all. This includes receiving any or all information briefings, undergoing a health assessment or being moved on to their dispersal housing three weeks after being moved to Glasgow.
- Since winter 2015 there has been persistent resort to using hotel and hostels. This is to be on a temporary basis but we know that some single people have been in hotels and hostels for months and some families for around six to eight weeks. These include torture as well as trafficking survivors and mothers returned there after giving birth. We understand that shared rooms for 3 to 4 people are the norm and not the exception in the hotels and hostels.
- We recognise the challenges that the Compass contractors, and any sub-contractors, have in handling increasing numbers with no proportionate, additional funds forthcoming from the Home Office. But we do not think the increasing volumes of people seeking refugee protection and in need of support, explains the deeper problems in forward planning, oversight and developing quality stakeholder relationships. We pinpointed these issues in our 2014 report and, in our experience, only some of these have improved since then.
- We urge the committee to be sceptical of whether Compass is actually generating "savings" for the taxpayer. We suspect it is closer to the truth that costs from dispersal are displaced or

shunted onto other statutory and third sector services that are publicly-funded. We ask the Committee to recommend the National Audit Office conduct a social impact analysis of Compass asylum dispersal. This should not be limited to Home Office Compass budget lines and their "savings" but include wider displacement of responsibilities and cost shunting.

- What we have witnessed in Glasgow is a persistent displacement of responsibility and costs to intervene and advocate in cases of people who have either not had their accommodation or financial support issues resolved or who have other unmet needs. This displacement itself stems from limitations in the Compass and asylum support contracts. Neither of these contracts provides any advocacy support. It is local statutory agencies and NGOs that often step in to fill the gap.
- Scottish public authorities are funded by the Scottish government to deliver services in those policy areas in the competence of the Scottish parliament. These authorities are accountable to the Scottish ministers and parliament. Asylum dispersal is a field where Scottish ministers have locus. This is evident through s101 (7) in the 1999 Act, the concordat, as well as most policies relating to the reception and integration of those dispersed are in the legislative or executive competence of the Scottish parliament and Scottish ministers. Scottish public authorities will on a de facto basis be significantly impacted upon by any asylum dispersal.
- These impacts include money. The budgets of Scottish public authorities and the third sector will be affected by the dispersal of people seeking refugee protection who will need to access health, legal advice and aid, education and social work, children's and NGO services. One other impact is destitution. Some of those dispersed will be refused protection. They are at high risk of destitution. This risk will increase when the asylum support changes in the Immigration Act 2016 take effect, affecting individuals **and** families as well as unaccompanied children transitioning to adulthood who have been refused protection.
- Scottish Refugee Council does not entirely reject the commercial nature of the Compass contracts. But, we are very sceptical. This scepticism comes from the message the Home Secretary has sent in structuring this public service as she has: it is legitimate for contractors to make money from housing refugees. At its worst, this may legitimise a cost-cutting mind-set where it has no place, be that to maximise profits or to minimise losses. This is a public service of enormous importance to those seeking protection. They really need the stability that a safe home brings. We ask the Committee to recommend a no-profit rule in any extended or future contracts for housing people seeking refugee protection in the UK.

Introduction

1. Scottish Refugee Council welcomes the Committee's initiative in conducting an inquiry into asylum accommodation. Housing is of fundamental importance to us all. At its best accommodation becomes a home: a place of safety and security, that gives dignity and privacy, and the basis for wellbeing. This outcome is never more needed than for those without it: the women, men and children displaced from their home countries who are seeking refugee protection here in the UK.

2. Since 1985, Scottish Refugee Council has worked with people seeking and granted refugee protection in the UK. Through our direct services, policy and legal development, advocacy and public attitudes work, we work to ensure that the treatment of women, men and children in Scotland and the UK meets the [key principles of a fair and humane system to protect and welcome refugees](#). Housing is fundamental to wellbeing and integral to the effective reception and integration of refugees. If housing is planned well, based on the needs of new arrivals, receiving communities and local statutory bodies and charities, it drives community cohesion and prevents divisions.

Themes relevant to the Inquiry

Compass was made for a different time and is arguably out of date now

3. Compass was designed before the unprecedented and ongoing humanitarian and refugee crisis. At the end of June 2013 there were over [21,000](#) people accommodated under the Home Secretary's legal duty at s95 Immigration and Asylum Act 1999. At the end of June 2016 it was over [37,000](#). It is likely this number will increase in the coming years. Furthermore, there is an uneven sharing of responsibility across the UK for receiving and integrating refugees seeking protection.

Compass is near the end of its 5-year life and needs radical change not automatic extension

4. The contracts started in 2012 and end in 2017. The Home Office may extend these into 2019. These are the largest of the Home Office's asylum contracts. It is good practice in public policy to take stock and assess all the available evidence and reach conclusions on whether these contracts have delivered both on their own and on wider terms. **The Home Secretary should include the report of the Committee's inquiry on asylum accommodation in this assessment. Only after the Home Secretary has overseen and made decisions based on this assessment should a decision be made on whether and how to extend.** It would be premature and disrespectful to the UK parliament were the Home Secretary to proceed and unilaterally extend the contracts without considering what the Committee had to say first.

Compass has lacked independent scrutiny since the start of 2014

5. The transition phase of the Compass contracts was scrutinised by the [National Audit Office \(January 2014\)](#) and the [Public Accounts Committee \(April 2014\)](#). But there has been no dedicated or comprehensive independent scrutiny since. It has been largely left to investigative journalism and NGO-led research and campaigns to highlight some of the problems in refugee housing that the Compass contract management regime should have been identifying. Necessary as such journalism and campaigning are they are not sustainable solutions and can only ever provide insights or anecdotal evidence rather than the wide body of evidence that should be generated through contract management processes plus those garnered through effective stakeholder relationships. We know also of [the Producing Urban Asylum project funded by the ESRC and led by Dr.Jonathan Darling at the University of Manchester](#). That project's findings, published in December 2015, were generally critical of Compass.

Compass is increasing the complexity of provision of this public service of housing to people seeking refugee protection

6. Compass is a commercial framework implemented through the Home Secretary entering six contracts with three private sector companies: Clearsprings Ready Home, G4S and Serco each share two contracts each. This reduced the number of housing suppliers in this public service from 22 to 3. But, in reality, it has merely reduced the number of contracts that the Home Secretary has to sign. Beneath these three contractors are at least 11 sub-contractors. Written evidence provided by [Serco](#), [G4S](#) and [Clearsprings Group](#) to the Committee earlier this year confirmed that between them and their sub-contractors they were leasing accommodation from at least 1,000 individual landlords, often in the private rented sector. Far from simplifying the landscape, Compass has rendered it more complex. **We ask the Committee to consider recommending that there be standard contract, sub-contract and leasing agreement templates and that these are publicly available to be used for all accommodation that is being publicly-funded for the purpose of housing people who are seeking refugee protection in the UK.**

Compass has weakened the local and national accountability of this public service

7. The Home Secretary has outsourced this public function to three private companies working to a commercial contract. This has led, in turn, to these companies sub-contracting property management firms, who then tend to source housing in the less tightly regulated private rental sector. These sub-contractors then enter leasing agreements with a range of landlords left to agree the demarcation of responsibilities and management fees.

The result is not only more complexity but less accountability too. In July this year, Chris Stephens MP (Glasgow South West) led a Westminster Hall debate ("[Asylum Seekers: Glasgow](#)"). In that debate, he said:

"Outsourcing may well suit the UK Government, as it allows them to outsource not only service delivery but a fair degree of accountability. Many of us have lost count of how many carefully drafted freedom of information requests and parliamentary questions have not been answered, on the sometimes dubious grounds of disproportionate costs or commercial confidentiality."

A quick analysis of parliamentary questions submitted by Stuart McDonald MP (Cumbernauld, Kilsyth and Kirkintilloch East) for the periods [1 January 2015 to 30 April 2016](#) and [18 May 2016 to date](#) on "asylum housing" show that only 1 question out of 14 were answered on issues such as inspections, faults and complaints; anti-social behavior, abuse and safeguarding; and training and criminal records checks of providers' staff. Almost all of these were rejected on the grounds of the information not being centrally held or that disproportionate costs would be incurred in gathering the information. One was refused on grounds of commercial sensitivity.

This is a public service and it is wrong in principle that it is so difficult, especially for parliamentarians, to get such information and use it to inform scrutiny and hold the Home Office and its contractors (and any sub-contractors) to account. **We ask that the Committee critically interrogate if the public interest is being served in relation to accessing information on contractor performance under Compass and, and, if it concludes not, recommend that the Information Commissioner conduct an audit.**

A further strand on ensuring sufficient accountability in Compass should be the Home Office's fine regime for the Compass contracts. These are the "service credits" recovered following non-conformance with the Compass KPIs by its three contractors. A recent parliamentary

question obtained the amount of "service credits" incurred by the three contractors across the six Compass regions.

The answer from the UK immigration minister provided a [table of fines](#). This set out that Clearsprings Ready Home have never had a "service credit" applied from 2012/13 to 2015/16 (inclusive); G4S had none from 2014/15 to 2015/16; and Serco in the North-West had only £1,974 in 2014/15 and none in 2015/16. But Serco in Scotland and Northern Ireland had "service credits" applied amounting to £156,156 in 2014/15 and £443,545 in 2015/16. We were surprised at these figures in light of the persistent criticisms elsewhere and wonder if this reflects disconnect between what the Home Office contract compliance system is telling it and what refugees, NGOs and local statutory bodies experience.

These figures may raise not only a question on the efficacy of the inspection and fine regime within the contract but also the need for independent inspection outside of it. Such would regularly assess contractors' performance in managing and delivering this public service. This need becomes acute in relation to the growing HMO estate being used to deliver this public service: on 31st March 2016 there were 2,804 HMOs being used partly or wholly for this public service. By 30th June 2016 this had increased by 10% to 3,073 HMOs.

We know of no requirement in legislation anywhere in the UK that requires a HMO applicant to disclose to a local authority that their intended use of the accommodation includes housing people seeking refugee protection. There would seem to be nothing to stop the contractors to either encourage a HMO applicant and / or "piggy back" onto a successful application. Such processes become very problematic if they develop without the knowledge of local statutory or national inspection bodies, which [this expose of dozens of asylum seekers crammed into single Home Office property](#) may have showed, graphically.

We ask the committee to consider not only if there is sufficient independent inspection around Compass but also specifically in terms of HMOs that are, increasingly, being used to house people seeking refugee protection. If the committee concludes there is not enough independent inspection of this public service including how and what HMOs are used, we ask them to make recommendations on these inspection weaknesses and gaps.

Compass is a policy framework that may undermine the Home Secretary's "widening dispersal" objectives as it doesn't fund, empower or adequately involve local agencies and communities to receive and integrate people seeking refugee protection

8. The Home Office's "widening dispersal" agenda is correct in principle but it will only succeed if it is right in practice too. The Compass system as presently designed may not be capable of meeting this principle given its centralised model; its lack of direct funding to and oversight for local statutory bodies; and its vulnerability to reputational damage from media exposés.

The Home Office policy since 2000 of moving, on a no-choice basis, those seeking protection to local authority areas around the UK is, in one sense, a policy of devolution. At its best "dispersal" as a method of policy delivery should fund and empower local institutions and services to receive and integrate new arrivals and to have local democratic oversight. They are best placed to do this as they have the local knowledge, networks and ability to provide wraparound services where needed.

Compass, however, does not do that. The Home Office funds three large companies, and any sub-contractors, to source housing in "dispersal areas" with few obligations to engage with local statutory bodies, with the exception of getting HMO licences, facilitating health assessments and GP registration.

It is our experience that the system is too often housing-led and not needs-led. It does not give sufficient regard or notice to local statutory bodies or to the best interests of those dispersed. For example, we are aware that since May 2016 hundreds of people originally dispersed to Glasgow were then re-routed to the north-west of England and London. This begs a question: why were they not dispersed there in the first place?

We ask the Committee to recommend that the Home Secretary join up all of her refugee programmes across (i) asylum dispersal, (ii) resettlement and (iii) the transfer and relocation of unaccompanied children. Joining-up in this way would empower local statutory bodies and communities to receive and integrate those seeking and granted protection to give common services where possible (e.g. language support) and distinct ones where needed (e.g. asylum legal advice).

Compass as a gender, disabilities and equalities-blind system

9. We and many other agencies and groups in the refugee rights sector, notably in Scotland the independent [Refugee Women's Strategy Group](#), have had long-standing concerns about how poorly the Compass framework meets the distinct needs of women and girls, as well as others such as disabled people and people who identify as LGBT. For example, the only reference to "women" in the Compass Statement of Requirements is in the context of pregnancy. There is no reference to women's safety or protection from violence, which, we think, reflects a wider issue of how women and gender needs to be far better integrated and reflected in the Home Office's asylum support system.

Similarly, we know of no disability or other equalities monitoring. We have advocated against decisions that have placed people in top-floor housing despite medical evidence that such housing is unsuitable. In that context, it is of serious concern the Compass contracts and their delivery [have not benefited from an equalities impact assessment, any other equality-proofing measure or equality monitoring](#). Given that the profile of women, men and children seeking refugee protection includes persecution and abuse, hazardous journeys with exploitation and significant trauma, this public service is likely to be of high priority to the public sector equality duty at s149 in the Equality Act 2010.

If the UK immigration minister remains unable to supply evidence that the Home Secretary and its three contractors have paid due regard, since the start of Compass in 2012, to this duty then the Home secretary may be vulnerable to a legal challenge. **We ask the Committee consider this issue and make recommendations to address this, particularly as the rationale of the PSED is to prevent unlawful discrimination, advance equality of opportunity, and promote good community relations through the delivery of public services, such as this one.**

These potential omissions around the PSED may raise not only significant legal risks for the Home Office and its three contractors. It also makes for poor policy: the failure to monitor and prioritise gender or other equalities in asylum support data and decision making renders the Home Office unable to understand the needs of those it is supporting. This includes the

provision of appropriate housing options for women, men and children seeking refugee protection, some of whom will be survivors of sexual violence, torture and trafficked exploitation with the psychological trauma and mental health such suffering entails.

Most fundamentally the failure to include gender and other equalities is perverse when one returns to the first principle that this is a public service to people seeking refugee protection. Many are women and children: the gender breakdown of Home Office asylum statistics for 2015 reveals that women accounted for over 10,000 of the 29,000 asylum applications with 3,000 female and 6,000 male children respectively. **We ask that the committee recommend the Home Office should, as a matter of urgency, fill the gender gap in asylum support monitoring and start placing gender and other equalities at the centre of its asylum support and accommodation system.**

Guita's story

Guita is from Iraq and came to Glasgow with her two-year-old son, fleeing domestic violence. She paid a people smuggler to take them over the border in a lorry and they were then crammed into a hold of a boat to make the treacherous journey across the Med, a journey which lasted several days.

She has been living in her 'temporary accommodation' flat for three months after her neighbour phoned to complain about water damage to her flat. Though Guita says she had reported it several times, nothing was done until her neighbour's flat was flooded and she intervened. Told she would only be there for a short period, she opted not to take all of her belongings. Here they live out of a battered suitcase in a room about 3 by 4 metres, papered with peeling children's cartoon wallpaper. Her son is too big for the cot that is pushed up against the wall beside his mother's bed.

There is very little floor space but they spend a lot of time in this room as another family – a mother and her 8-year-old son - share a two bed flat. The two families do not share a language or culture. The older son of the other family and her own boy find it difficult to get along; there are squabbles and fights. So Guita and her son stay mostly in their little room, avoiding additional stress.

Now the family are out for a few hours. Guita's little boy rides his trike up and down the hall while we speak. He doesn't often get this chance for such freedom.

"I had a flood in the front of the window in my living room and bedroom and they said I must move for four days and we fix my flat," she explains. "Then after two months they say they cannot fix your flat; landlords will not pay.

"When they move me there I say to my housing officer I wait for an important letter from physiotherapy and when it arrives you must forward it to me. So after eight days they send and I lost my appointment. I had been trying since last year but because of them I missed this." She is now at the back of the queue again, and still in pain.

Now she sometimes gets searing pain and her leg gives way. She lives on the second floor and the stairs here are steep. There is more stairs from the street too.

"I feel pain and I fall down," she says. "Two times I fell down and my son he also fall down. My doctor has said I couldn't carry more than 1kg and my son is more than 17kg." But she has to carry him – he is scared of the dogs on the close, which bark loudly, and won't walk. She says the neighbours let the dogs pee in the close. She say goes out to get her shopping she must leave it downstairs and hurry up with her son, leaving him crying at the doorway while she runs to fetch the shopping. There is no-one to help her. "Drug users and people drinking in the close," she says. "Upstairs they fight and my son is afraid. He has very bad memories."

When she moved here it was not just the close that was dirty – the flat was filthy too and infested with insects. "My son has a skin problem when I first came here because it was so dirty," she

says. "I was prescribed cream and my GP wrote a letter for me to say that. The bathroom, the kitchen, all dirty. And I had to call them [the housing provider] because small insects came in." They sprayed the flat and now they are gone and it is clean, though nothing is in good repair.

But the main problem is how far from her previous community she now is. It took four weeks to change the address of the post office where she can access her support. But the GP is still in London Road; she has to take four buses to get there. "It's not nice," she says. "One day I call my housing officer, please my son is so sick. Please let me move me back. Then come and he was talking too fast and I didn't understand. My neighbour listen and she said he told me he couldn't do anything. Sometimes I'd be so angry I'd be crying. Now when I call my housing officer he doesn't pick up the phone."

One night her son had a fever. She says: "When my neighbour call my son she told me I need to call an ambulance. They [the doctors] saw bruises on my son and I explained he fell down. He said it is not like one time so they write me a letter and tell me to go to a bone hospital for children."

"Distraught she asked the housing officer if she could take her child by taxi: "She said she couldn't do anything," she shrugs.

"They don't listen. From nine days please I need my paper from the Home Office but he don't call me back. When you call they say leave your number but they don't call you back."

The Home Office, its Compass contractors and some of their sub-contractors have attracted considerable negative media coverage, in particular since January 2016

10. What the "red doors" (in Middlesbrough) and the "coloured wristbands" (in Cardiff) media exposés showed was, amongst other things, a disconnect between what internal contract management processes were telling the Home Office and what those people living in the accommodation itself felt about how they were being treated.

The Committee responded quickly to these issues and in the first phase of this inquiry made important conclusions and recommendations in its [report into the work of the Immigration Directorates Q3 2015 \(2nd March 2016\)](#) (pp.13-22). The Home Office responded with an asylum accommodation advisory board. Scottish Refugee Council was invited to join this board. We regard it as an important initiative and hope it will continue as it provides a direct link between the UK-wide refugee rights community and the Home Office.

In Scotland, critical media coverage of the Compass contracts has escalated since February 2016 to become frequent adverse media coverage

11. Recent media coverage in Scotland has been critical of how Serco and Orchard and Shipman (Glasgow) are managing and delivering this public service to people seeking refugee protection who have been dispersed to Glasgow. This coverage has appeared notably in The Times, BBC Scotland and the Sunday Herald, among other outlets. For example, see: [inquiry call over 'callous treatment of refugees'](#); [asylum seekers allegedly locked out of homes](#); [asylum seekers to leave Glasgow hostel after claims of ill-treatment](#); [asylum seeker homes defects not fixed within timescales](#); [revealed: the scandal of refugees housed in slum conditions in Scotland](#) [big profit for criticised asylum housing firm](#); [two suspended at asylum seeker housing company](#); [ban for landlord paid to house asylum seekers after dirty money probe](#); and [poor housing for refugees causing 'suffering' and 'stress'](#).

As with the "red doors" and "coloured wristbands" exposés, connecting all these stories has been a breakdown between what the Compass internal contract management processes in Scotland are saying about performance and what those actually living in the accommodation or working at community level are experiencing.

Scottish Refugee Council's services and community links concur with these reports

12. We seek to resolve complaints presented to us by refugees constructively and in the best interests of the client. But these are only the cases that are raised with us and other agencies. It is very important to recognise the inherent fear that many people seeking protection feel towards the Home Office, and their contractors or sub-contractors, because they know, ultimately, that it is the Home Office that decides their asylum claim. This fear has to be considered not only when analysing levels of accommodation problems and complaints data but also when assessing both the efficacy of the Compass monthly inspection visit and the wider independent inspection gap of this public service. For instance, we have been long concerned about the absence of any requirement in these monthly inspection visits to check on the wellbeing of those in the accommodation and the corresponding absence of a KPI to ensure such "wellbeing checks" happen.

We ask the committee to consider whether the current KPI regime in Compass sufficiently recognises the need to hear directly from those living in asylum accommodation about standards and how they are being treated. If the Committee concludes it does not, we ask it recommend (i) a KPI on refugee voices is included in any extended contract to 2019 or in any successor policy to Compass; (ii) an independent advocacy service be built into any extended contracts for Compass in 2017-2019 and within future approaches to this public service after 2019. This will build confidence and stop costs shunts to other agencies; and (iii) that periodic independent inspection is built into how this public service is monitored including scope for unannounced inspections but such are done in a manner that respects the privacy of the women, men and children in the housing itself.

Scottish Refugee Council and many other agencies have had concerns from the outset of Compass about the design of the contract itself

13. We think there are structural problems in Compass. Among these is a concern that the contract does not allow for any formal local democratic oversight of practice. It is also poorly funded with only around £3,500 per annum allocated per individual person seeking refugee protection as compared to over £8,500 in the first year for someone granted humanitarian protection through the Syrian Vulnerable Persons Resettlement Programme. This is one aspect of the "two-tier" system the Committee correctly pinpointed in its March 2016 report into the immigration directorate.

Adequate shelter is a human right. The Home Office knows better than most the profile of people seeking refugee protection: women, men and children seeking protection from persecution that often will have experienced violence and trauma and in many cases also torture and exploitation. And yet, the Compass contract does not adequately recognise such vulnerabilities inherent in the population, nor does it factor in gender differences, or acknowledge equalities issues sufficiently. As such, it is simply not fit for purpose as it cannot meet the needs of the population it was designed to accommodate.

We know of no direct funding from the Home Office to key local statutory bodies to respond to the needs of this population. We urge the Committee to consider any "savings" claimed by the Home Office made through Compass in its proper context of local statutory services and charities filling in the gaps from their own budgets via advocacy and services to lift vulnerable people out of them. We are concerned that any Compass "savings" actually stem from a displacement of responsibility onto local agencies, charities and communities and represent a false economy that masks the kinds of costs shunting that Councillor David Simmons of the Local Government Association told the committee when giving it oral evidence recently.

We recommend that the committee asks the Home Office and its contractors to disclose the criteria for calculating the costs and savings from the Compass contracts and whether this includes any consideration of other factors, including the potential for displacement costs incurred by local statutory services and agencies. If the answer is unsatisfactory we suggest the committee makes recommendations for a more holistic and therefore realistic assessment of costs and savings from Compass and the dispersal of people seeking refugee protection to local authority areas. In particular, we ask the committee to recommend that the National Audit Office conduct a social impact analysis of Compass asylum dispersal with such not limited to Home Office Compass budget lines and its "savings".

Key points from Scotland

Scottish Refugee Council's contact with people seeking refugee protection post-2014

14. We had contact with most of the thousands of people seeking refugee protection dispersed to Glasgow since 2000. However, in April 2014, the new contracts for asylum support advice were awarded to Migrant Help. We now have slightly less contact with those dispersed to Scotland, so what we present here is best considered as a detailed snapshot of accommodation issues. Nonetheless we still see hundreds of people seeking refugee protection most of whom have been dispersed here via Compass as well as some new arrivals who we assist to access the asylum procedure. Our Family Key Worker Service, Destitute Asylum Seeker Service and established and new community networks have continued to receive reports of problems throughout the life of this contract about poor standards of housing or inappropriate, neglectful and even hostile treatment by staff from both those in accommodation and agencies supporting and advocating on their behalf.

15. In order to get a clearer understanding of the extent and nature of accommodation problems through our services and community work, we undertook research that led to The Extent and Impact of Asylum Accommodation Problems in Scotland (summary), published in August 2014. The report's methodology comprised (i) statistical analysis of over 450 client files from between February 2013 to February 2014 with accommodation issues; (ii) three focus groups comprising over 40 refugee participants with direct experience of living in asylum accommodation in Glasgow and (iii) development of in-depth case studies. We also conducted a short review of key literature relating to asylum accommodation under the Compass contracts.
16. Based on this evidence, the report found that:
- People had sometimes been put in unsuitable housing indicating insufficient consideration has been given to their needs and histories of persecution;
 - People seeking asylum who are housed in Scotland were experiencing problems with the physical condition and amenities in their accommodation;
 - These problems were having an adverse impact on people seeking asylum in terms of their mental and physical health and ability to maintain social connections;
 - Front-line staff in external agencies were having to intervene to advocate with housing providers on behalf of those seeking asylum to resolve these issues; and
 - People seeking asylum had low awareness of their rights and entitlements and some were reluctant to complain for fear that it may affect their protection claim.

Based on these findings, we made recommendations, including that:

- The Home Office should initiate and lead a comprehensive review of Compass in Scotland in order to radically enhance the housing standards and experience of asylum applicants dispersed to Scotland. This review should be multi-agency and involve, at the very least, the Scottish Government, key housing bodies, refugee representatives and refugee support organisations;
- The Scottish Government should consider initiating proactive monitoring of housing arrangements, standards and experiences for people seeking refugee protection, who are in Scotland;
- The Scottish Government should consider the feasibility of arranging for periodic joint thematic assessments of housing arrangements, standards, and practices for those seeking refugee protection, who are dispersed by the Home Office to Scotland;
- The Home Affairs Committee and Public Accounts Committee in the UK Parliament should, in the near future, revisit their (then) recent Inquiries that related to asylum accommodation and Compass; and

- The Home Office should improve arrangements for the implementation of the Compass contract in Scotland in the areas of (i) planning and maintaining appropriate housing for those seeking protection; (ii) appropriate interpersonal relationships (by contractor and sub-contractor staff) towards women, men, and children seeking protection; and (iii) information on rights and entitlements for those living in asylum accommodation.

Comments and response of the Home Office and the Compass contractors in Scotland to the report's findings and recommendations

17. In mid-July 2014 we shared our accommodation report, findings and recommendations in draft form with Serco, Orchard and Shipman (Glasgow) and the Home Office. Comments were invited but none received. One month after publication we sought a meeting with the Home Office to discuss and take forward the recommendations, but unfortunately this was not agreed to.

However, in January 2015, Serco initiated a third sector forum meeting which brought together some of the NGOs in Glasgow supporting refugees. There were two further meetings of the forum in May and September 2015. It then did not meet again until April 2016, but since then it has been convened more frequently. The forum is a welcome initiative for building relationships, sharing information, and monitoring issues and trends.

It is also an important mechanism for increasing the accountability of Serco and Orchard and Shipman (Glasgow), and a way to improve service outcomes for those in the accommodation. For example, the forum provided a space to raise problems, such as the fact that welcome packs and occupancy agreements have only been available in English since the start of the contracts. Four years into a five-year contract, Welcome Packs in Glasgow are still only available in English, despite the fact that it is well known that many among the asylum seeking population do not have English as a language either at all or to the requisite level.

We do not think it should have taken until the oral evidence session before this committee on 13th September 2016 for it to be clear to Compass bodies that English-only provision of vital documents was a problem. We agree with Rupert Soames' response to [Stuart McDonald MP \(Cumbernauld, Kilsyth and Kirkintilloch East\) Q278](#): "It sounds like a no-brainer: you should have a welcome pack in the language of the person who is going to use it'.

To not provide crucial information in an accessible manner may not only be a breach of the Compass contract ([Clause 2.2.5 in Schedule 2](#)) but a symptom of a lack of sufficient regard being given to equalities and therefore to people's real needs, in practice.

More positively, as a result of concerns raised by NGOs since 2015 on at the then new Serco third sector forum a commitment was given to translate occupancy agreements into five languages. We recognise Serco and Orchard and Shipman (Glasgow) have used a interpreting company at induction but the value of a welcome pack and an occupancy agreement are when you need them, which is not at the induction stage only.

The provision of interpreting and translation services at induction and at other parts of this public service is not only welcome but inherent to compliance with the Compass contract. It is for that reason that we had concerns about recent FOI data that that we have had sight of. This stated the interpreting and translation cost incurred by Serco in delivering this contract in Scotland in 2014/15 was £5,747 in 2014/15 (when the s.95 "accommodated" population

ranged from 2,400 to 2,800) albeit it increased to £41,819 in 2015/16 (when the s.95 "accommodated" population was broadly the same: 2,600 to 3,000). It is important, in terms of accessibility and equalities, that information required in delivering this public service is in a manner and in languages that people can understand.

Position of the Scottish Government to the report's findings and recommendations and Compass in Scotland

18. We understand the Scottish Government remains supportive of the recommendations in our report, but it is recognised that their room for manoeuvre is limited given that asylum is a matter reserved to the competence of the UK Parliament. Nonetheless, asylum dispersal and any consideration of designation of asylum reception zones pursuant to s101(3) of the Immigration and Asylum Act 1999 should be an area of joint working governed by working level agreements under [the Home Office-Scottish Government concordat](#) (p10). The design of dispersal in the 1999 Act that was that, in a Scottish context, for the primary relationship to be between the UK and Scottish governments not the UK government entering bilateral arrangements with local authorities.

We ask the committee to recommend that the UK and Scottish governments enter a working-level agreement on the dispersal of asylum seekers that is inclusive of not only Scottish local authorities but also from the outset of other key sectors such as legal, health and the third sector. An inter-governmental working-level agreement would not interfere with the UK government's current or extended contracts with Serco.

Such an inter-governmental agreement would ensure that Scottish ministers, who have policy and funding responsibility for the bulk of the services for the reception and integration of people dispersed to Scotland, have strategic oversight of how this complex process is managed including so it supports and does not undermine community cohesion objectives.

We note similar points are being made by the [Combined Greater Manchester Authority](#) to have greater control over asylum dispersal in its member councils. There is good practice emerging from the Syrian resettlement process in Scotland and we think this arises from the Home Office and Scottish ministers working together in an open way with the latter having strategic oversight of how this process is managed here, supporting the effective country-level coordination of the efforts of local statutory and third sector bodies – particularly local authorities – who at the local level organise the reception and integration of Syrian families.

Persistence of Compass asylum accommodation problems

19. Based on our contact with communities and partner agencies, the findings and recommendations from our 2014 report are, for us, as relevant now as they were then. For example, the [independent evaluation of our asylum seeking families' service](#) from March 2016 reported that the rights-based approach of that service identified concerns around housing and empowered people to report defects and make complaints to Orchard and Shipman (Glasgow) and Serco. The evaluation noted that:

"Assisting families to report problems in their accommodation, advocating for these to be resolved and making families aware of their rights to safe and appropriate accommodation has increasingly become a major element of the service's work:

'At the start there were no accommodation complaints on the scale that there is now, accommodation complaint is a really big thing that have occurred over the last months or last year and become a bigger part of what we do'

This perception was supported by our review of the data. 27 of the 38 case files reviewed (71%) recorded incidents where families complained of unsuitable accommodation. This has largely been on an unplanned basis, with families contacting their keyworker by phone or in person to report problems that they have been unable to resolve themselves."

From April to August 2016 our family service worked with 35 families and has had to engage in intensive advocacy in that period on resolving 25 separate accommodation issues, spanning negative treatment to poor housing standards, and including:

- Unannounced visits and unbidden entry to accommodation
- Unplanned, short notice and disruptive relocations
- Unsuitable housing for people with mobility problems or physical health conditions
- School-going children not able to access education as stuck in initial accommodation
- Person left in initial accommodation for at least four months
- Infestation (rats and / or insects) in accommodation with families
- Electric shocks from cooker
- No hot water and boiler not working
- One case where no heating for four days; and
- Washing machine not working as well as a case where none supplied.

Increasing numbers of people seeking refugee protection dispersed to Glasgow

20. Since the publication of the Scottish Refugee Council report in August 2014 we have not found any discernible improvement in those areas that were subject to findings. However, the numbers of refugees seeking protection who have been dispersed to the city has increased significantly over the life of the Compass contract.

The [most recent national asylum statistics](#) published in August 2016 plus local data from the Scottish Asylum Stakeholder Forum show that in winter 2012 there were 1,664 people (on s95) in "dispersed" accommodation in Glasgow. In summer 2016 there were 3,900 (s95) in the city plus 404 (on s98) and 507 (on s4) making a total of 4,811 people. These are levels of dispersal to Glasgow not seen since the start of 2007.

This has exerted significant pressure on the contractors and sub-contractors as they are working within a smaller budget to that of 2011 or 2007. And, they have to do so at a time of foreseeable but ever-increasing demand as more people seek refugee protection in the UK. The Home Office continue to bear down on the contractors and sub-contractors to source suitable accommodation. This is proceeding with a persistent refusal by the Home Office to inject funds, proportionate to demand, into Compass sufficient to meet this upward trend.

We suggest the committee questions the Home Office and its providers on the financial impact of increased numbers and whether they are considering any wider displacement costs on local statutory services and charities. We also suggest the Home Office is asked whether it is prepared to inject new funds at the proportionate level into Compass.

Increasing use of private rented housing and greater dispersal across Glasgow

21. Another important development in Glasgow is the increasing use of the lower end of the private rented sector market and greater use of property in East Glasgow. In April 2015, 45% of asylum accommodation was in the north-east compared to 33% in the south and 22% in the north-west (Glasgow City Council data provided to Scottish Refugee Council).

Most asylum accommodation in Glasgow is in the city's 5% most deprived areas as measured by the [Scottish Index of Multiple Deprivation \(2016\)](#). For example, housing is increasingly being procured in the east of the city. This is an area with multiple socio-economic challenges, which includes low levels of investment in and regulation of its housing stock. Historically the east of Glasgow has not received many people seeking refugee protection and so lacks the networks and services that have developed in other areas, such as Govan in the south-west.

These developments have deepened the already high risk of [social isolation](#) for people seeking refugee protection stemming fundamentally from the denial of the right to work and the very low levels of Home Office financial support of £36 per week per person. People seeking protection are being scattered across the city into neighbourhoods of with historically low levels of public investment and unfamiliar with refugees. This is a symptom of how housing availability and costs are trumping the wellbeing of those accommodated.

We suggest the committee considers and questions the Home Office and its providers on the extent to which Compass prioritises housing-led decisions that cause harm to those dispersed including isolation and mental health. If the responses are not satisfactory then the National Audit Office should conduct a social impact analysis of Compass with a view to informing any contract extension and, in particular, any successor contracts to Compass post-2019.

Lenka's story

"I had terrible experiences in asylum housing in Glasgow. I and my two children have been treated in my accommodation in Glasgow, and how this has hurt me and my children. The roof fell in my property. A huge chunk fell directly on my son's bed. Thankfully he was at school; otherwise he may be damaged seriously. I was shocked but since then others have told me that this happened in other flats in Glasgow where asylum seekers are put.

I phoned my housing provider and they came quickly, which was good. They moved me within a few hours to accommodation at the other side of the city. I was sad to go as I had friends there. I was worried too. What about my children, they loved their school and were excelling. They have awards and are famous at their school and respect their teachers. Will they have to change school?

I didn't know my new area, I was isolated. I was asking the housing provider to repair the ceiling and move us back due to it was not safe place for us.

I was spending almost ½ of my money every week on the bus to take my two children miles across the city to get to school. They travelled 15 miles every day. I had hardly any money and it was all going on the bus. Every day: 1 and ½ hours there and 1 and ½ hours back. I was tired, hurt, and desperate to get back to my old flat, at least I knew people there.

The housing provider told me they would get me back but nothing good happened, all summer. Some of my belongings were lost. In the rush to leave most of my stuff was left. They did move some of it to another office. But, I had to get taxis to take it to the new accommodation. Some of my belongings were lost: I don't know where they are, they don't, and nobody does.

They left my Christmas tree at the old place. They laughed at me when I kept phoning to get it. How dare they, I got a good Christmas tree for my children, I saved for it: £70. It mattered to me but not to them. They didn't take my keys from me, so I could still go back. I told them I wanted the tree, they laughed again, eventually I got it. They had moved someone else into my old flat.

My children were due back at school in August, but I was still in the other side of the city. I kept trying and at last in September my housing provider said I would be moving back and to the old place, on a specified time and date. I packed everything, all ready to go.

That morning, nothing: no van, no phone call. I waited until lunchtime and called the housing provider. I was told the van would be there soon. I waited, nobody came. I called again, many times but no answer. I couldn't even leave a message. I had told my children to go to the new property after school – it was close after all. It all made sense: after school go back to the old flat.

So, as nobody was telling me what was happening, I went to the old flat, my new home again. The housing provider had a cleaner there, under contract. He was nice. But he received a call from one of the housing officers, who was angry that I was there. The cleaner passed the phone to me. The housing officer shouted at me. He ordered me: "to get out". Where was I to go, I asked? He said it again, this time to my neighbour: "she needs to get out". They sent a taxi for me and my children.

The only good thing is that they promised to move us the next day. The next day: no one came. I was crying. What was happening? I phoned them, many times, but no answer. I went to an advice

agency. They helped. They responded to them but why not me? I am the person they should be talking to. It wasn't good news. My move was cancelled.

Apparently, the Home Office instructed them to cancel the move. That was it. I had to go back, across the city, taking my children every day to school. Then, I wait around before taking them back. What kind of life is this, what kind of way to treat people? The advice agency asked the Home Office for an explanation. No response or explanation.

At last I was told a flat had been found. Finally after six months I was moved to housing closer to the school. I was relieved. That day the van did turn up. I hoped the flat would be okay, clean at least, all the main things would work. I was wrong. It was filthy: the floors, carpets, and sofa. There was rubbish behind the washing machine (which didn't work), the fridge, and under the bath. There was no heating in the living room and the cooker didn't work either. There was a terrible smell.

I couldn't believe it. After all the mistakes, the delays, the fact that my son could have been damaged when the roof collapsed. Now, they had put me in here. It was worse than what I had left. I knew I this wasn't right and no one should live in these conditions. Many asylum seekers don't stand up for the rights though, in case it damages their claim, or they are too traumatised.

My children and I had to stay overnight but after the advice agency again advocated we were moved to a hotel, until the problems were sorted out. We moved on Friday evening and over the weekend we were at a hotel. On Monday morning, the housing provider told the hotel to tell me I had to leave and return to the property.

I asked them if the problems were sorted but the company couldn't say. I didn't know what to do. Again, after help from the advice agency, I was told I didn't need to go back yet – the repairs and redecoration hadn't been done yet, but I was to go to another hotel that evening.

I am now out of the hotel, back in the accommodation, and things improved a little, But, now the electricity water supply has been closed down, the rubbish under the bath and behind the washing machine are still there – despite me asking that they be taken away - and I have been told another family may be moved in, but most of all I have been told 'not to complain again'."

Operational problems from gender and equalities perspective

22. Many of the current operational practices in the UK may not be suitable for women seeking protection, including: (i) the organisation of initial accommodation especially when single women or female-headed families are placed into hotels often isolated from support and services, or in male-dominated full-board hostels with no women-only spaces; (ii) when women are sharing with unknown men in dispersal accommodation, for example, in the case of unrelated couples; or (iii) when the health and wellbeing needs of pregnant women in full-board initial accommodation sites have insufficient regard in terms of meals or difficulties accessing health appointments and getting to and from hospital during labour.

As mentioned above, for the most of the past 1 $\frac{3}{4}$ years there has been no fully integrated and co-located initial accommodation services in Glasgow. We understand from sources in the statutory and third sector that this has had a significant and at times harmful impact including for women in so far as health assessments are not done, or done quickly enough. We further understand that such problems are not due to the local health authority but stem from this gap in fully integrated and co-located initial accommodation services. At its worst, no health

assessment may lead to what should be preventable deterioration in health or in related support needs being worsened or unmet.

More broadly, gender based violence is endemic in conflict settings and on migration journeys. In [a study of women newly arrived in Scotland seeking refugee protection](#) in 2009, 70% reported having experienced physical and/or sexual violence. Given what we know about this population, it is of concern that prompt access to specialist support may be undermined by gender and other particular needs not being integral to this public service. We hope the Committee agrees that this is an omission that must be urgently addressed.

The experience in Glasgow and, indeed, the written evidence to the committee from many other organisations across the UK on particular needs and vulnerabilities not being recognised or met sufficiently, may indicate that the Home Office, in designing the Compass contracts, did so primarily with financial and accommodation considerations in mind. If that is the case then that is clearly wrong. Any extended and post-2019 contracts must start from the profiles of the refugee population themselves and the imperative is how housing can meet those needs and not the other way around. This can be done by centring gender and equalities into their development, using the public sector equality duty, it is intended.

We ask the committee to recommend that any extended and post-2019 contracts for this public service of housing have gender, equalities and vulnerabilities stemming from torture, exploitation and psychological trauma, at their centre. In doing so, the committee will seek to ensure that in any extended as well as post-2019 contracts that it is the fundamental rights of the women, men and children seeking refugee protection are as influential in accommodation decisions as is the availability of the housing stock itself.

More use of hotels and hostels as "short-term" measures and reputational damage

23. Whilst not a problem exclusive to Glasgow, there has been a very worrying and rapid increase in the use of hotels and hostels to accommodate people seeking protection. This has been an issue in Glasgow since winter 2015. For instance, we understand from partner agencies in Scotland that the number of people, including families, staying in hotels or hostels for at least four to six weeks stood at 400 people in May 2016 (there were 1,500 in hotels across UK at that time) with approximately 100 in hotels or hostels at any one time since November 2015. This is still the case in Glasgow, albeit numbers have reduced which is welcome, but the wider picture is that hotels and hostels are, sadly, normal in Compass now.

The increased use of hotels and hostels not only raises questions as to the adequacy of joined-up forward-planning within the Home Office and its Compass contractors (and sub-contractors) but has wider adverse impacts too. One of these may be to undermine the confidence that local statutory bodies, charities and communities can have in the ability of the Compass bodies to manage this contract in an effective and sustainable way that inspires rather than undermines confidence.

In 2015, Glasgow City Council passed a [Motion](#) in 2015 expressing its "strong concerns at the reported treatment of asylum seekers" under the Compass contract in the city. After receiving the Home Office's written response to this Motion in December 2015, the Council [agreed to write to the Home Affairs Committee to call for an inquiry into asylum accommodation](#).

We know of other local statutory bodies that have had concerns about the impact of Compass on its ability to provide vital services to those newly dispersed to the city. We have been made aware of recent FOI data that would seem to indicate there was a doubling in missed health screening appointments in January to July 2015 in Glasgow as compared to the equivalent periods in 2014 and 2013. In so far as this data is valid it may have been aggravated by the tendency in Glasgow since late 2015 to use hotels or hostels for weeks and months.

Weaknesses undermining full provision of initial accommodation services

24. One of the factors behind Glasgow City Council's concerns was the lack of an initial accommodation facility in Glasgow from February 2015 to July 2016 for the provision of key services for newly dispersed asylum seekers. Under the Compass contract the contractor is required to provide office space for initial accommodation services to be given by "nominated third parties" especially Migrant Help and the local health authority, to those newly-dispersed to the city. These services include (i) provision of briefings, (ii) facilities for completion of online financial support applications ("ASF1s"), (iii) rooms for smaller meetings and private appointments as necessary, and (iv) appropriate space and rooms for the local health authority to conduct health screenings.

As the new facility at Clyde House in the Govan area of Glasgow has recently become fully operational, for most of the preceding 1 ½ we understand that those newly dispersed to the city have been transported, using taxis and buses, to health appointments in NHS offices elsewhere in the city. We understand from a range of sources that this has, at times, contributed to a reduction in the % of health assessments completed as mentioned earlier.

Furthermore, we understand that the delay in securing an initial accommodation office space has also impacted adversely on the number of briefings that can be delivered and the time taken to submit asylum support applications. These difficulties may also have been compounded by the increasing resort to hotels and hostels during this period, which are not appropriate places for health outreach work, for example.

Our concern throughout has been twofold: (i) the adverse impacts on those newly dispersed to the city and on key local statutory services, such as the local health authority and, (ii) that the demolition of the previous "high-rise" initial accommodation facility at 33 Petershill Drive in Glasgow had been foreseeable for a number of years. This latter concern raises for us, again, a question about the quality of joined-up forward planning within the Home Office and its Compass contractors and sub-contractors.

Increasingly housing-led practice in managing and delivering Compass accommodation

25. The problems in accessing these key initial accommodation services have been aggravated by ever-increasing numbers of people seeking refugee protection who are dispersed to the city with shortages in the availability of suitable dispersal accommodation. This tension between the supply and demand for housing is not peculiar to the Compass contracts but it seems to have been made worse through the unwillingness of the Home Office to inject proportionate new funds into this vital public service.

As is the case in other dispersal areas in the UK, our experience is that decisions are increasingly housing-led rather than needs-led. Some of our clients, with physical health conditions, have been accommodated in the upper floors of tenement blocks despite medical

correspondence advising against this. Others have been moved at short notice around the city to free up space, sometimes with insufficient consideration for the difficulties this creates for families with school-age children or those needing to access their local health services.

Such predicaments are rendered worse when people have to spend large parts of their small weekly financial support on transport costs, with negative knock-on effects on meeting other essential living needs. We understand that sometimes people have to be moved from their dispersal accommodation, but we have seen this happen too often and in ways that are detrimental to the wellbeing of people dispersed to the city.

Chitra's story

Chitra and her family had been accommodated at their address for 2 years. For most of that time there were three of them in a tiny bedsit: Chitra, her husband, and their three-year old son. Then Chitra had another son. So, there was even less space and the overcrowding got even worse.

They were left there for two months and there was no sign of a move, despite the monthly visit by their housing officer. The bedroom space was small and the number of beds couldn't fit inside it. In particular, the eldest son sleeps in the open plan kitchen/living room on a bed behind the sofa and as such has access to kitchen equipment which for Chitra presents a safety risk.

Orchard and Shipman staff had been inspecting their property for 2 years and 2 months but the family had been left in there despite the overcrowding and safety issues.

To make matters worse, Chitra and her family suffered anti-social behaviour from their neighbours and local youths and, crucially, these problems and incidents were reported to the Orchard and Shipman housing officer inspecting the property but Chitra said her concerns were ignored and nothing happened. Chitra felt she and her family had been left to suffer in silence.

Chitra told a local community worker about her suffering and she contacted an advice agency who raised the matter with Orchard and Shipman (Glasgow). The matter was resolved quickly and Chitra and her family were moved quickly to new, more suitably-sized accommodation. Whilst that is positive, it should not have needed this intervention. The housing officer, when doing the inspections, should have initiated it and not only doing so after receiving representations from an advice agency.

Short-term measures as evidence of forward planning issues and housing-led decisions

26. Since May 2016 the Home Office, Serco and Clearsprings Ready Homes have implemented what initially was a "transfer" agreement whereby families initially dispersed to the north-west of England were routed to Glasgow with singles being moved in the opposite direction or to London. In itself this made sense as it meant families could fill hitherto under-utilised housing but it begged a question as to why they had not, at the planning stage, been dispersed to Glasgow in the first instance given that that is where the most suitable housing stock was.

Similarly, we know of cases where singles were to be moved at very short notice from Glasgow despite not being new arrivals but living in the city for a number of years. We advocated successfully in these small number of cases and the contractor to its credit dealt

with it well when alerted to it, but the underlying concern is a question of how rigorous the selection criteria for this relocation programmes is and why people with strong links to Glasgow were being uprooted at short notice and at great distress.

As noted above, we understand that around approximately 400 single adults have been moved to London from Glasgow since May, principally from hotels, which is positive in that hotels are not suitable accommodation for the people affected or the exchequer. But, we understand also that health and other agencies in Glasgow do not know where people have been moved to and, especially, whether their (sometimes urgent) health needs are being met at their destination.

Our sense is that the Compass system in Glasgow has come under greater strain through increased numbers but that this is only part of the justification for some of these problems. Other factors should also be considered, such as the quality of joined-up forward planning and contract management that could, as we suggest above, have prevented initial accommodation service access issues, led to less resort to hotels and hostels, and the need for transfer agreements and relocations from one dispersal area to another, often hundreds of miles away.

We can't be certain that such decisions whether more about administrative preference than other factors but in so far as they are that should never justify uprooting people settled in an area or relocating people at short notice from one dispersal area to the one they should have been moved to in the first place.

Displacement of Compass costs to Glasgow's public sector, NGOs and communities

27. In light of these shifts in the numbers and geographical scattering of the dispersed population, it is important that that the Committee adopts a critical perspective to any "savings" within the Compass budget lines. Confining analysis to the Compass balance sheet may conceal the costs incurred by statutory, third and community sectors in any UK dispersal area and including in Glasgow.

We agree with what Councillor David Simmons, Chairman of the Asylum, Refugee and Migration Task Group at the Local Government Association, told the committee on 13th September 2016:

"One of the big challenges for a local authority is the risk of cost shunts. What you achieve as a saving on the Home Office contract by, for example, saying, 'We are no longer going to pay for accessing GP services' means that the local hospital, through its A&E, suddenly picks up a load of extra costs. Saying, 'We are not going to specify anything to provide appropriate educational support' means that the local authority needs to step in. The same goes for saying, 'We are not going to provide appropriate social care through the contract.' So that is one of the issues with it."

We would only add that such "cost shunts" from the Home Office and its Compass contracts are not confined to local statutory bodies but to NGOs, third sector and community-based organisations too. As Gary Christie, Head of Policy and Communities at Scottish Refugee Council told the committee also on the 13th September 2016:

"I just know that we are using resources that we would prefer not to be using to resolve accommodation problems, and I am sure that many third-sector organisations and public bodies would say that as well. We would prefer to be doing our job than things like that."

Profits and losses being made from the Compass contract generally and in Scotland

28. Furthermore, we think that any investigation into the costs or savings in Compass must include consideration of the commercial structure of the contracts. Profit is not only enabled by these contracts, it is being made by at least one of the contractors (Clearsprings Ready Home) and at least two of the sub-contractors (Jomast working under G4S and Orchard and Shipman {Glasgow} working under Serco in Scotland at least in the period 1st April 2014 to 30th September 2015), as the Committee was informed earlier this year. However, we understand that Serco is making significant losses from its Compass contracts in Scotland, Northern Ireland and the North-West of England.

Scottish Refugee Council does not object to profits *per se* through Compass but we think it raises the following serious questions of public policy and the best use of public funds:

- Should profit be permitted at all in the context of provision of such an important public service to people seeking refugee protection: women, men and children who have fled persecution and abuse and will have experienced difficult, traumatising journeys?
- Should profit be allowed at a time of public austerity or should all monies go into the public service itself and not anywhere else?

- Can profit be justified against a backdrop of persistent reports from across the UK of inappropriate housing and treatment, including in Glasgow?
- Is it appropriate and safe that the public service of providing housing to people seeking refugee protection should – as it currently is in Glasgow – be reliant on a "de facto" private subsidy arrangement between Serco and Orchard and Shipman?
- Would it not be more responsible to ensure that this service relies on public funding only?

As mentioned, Orchard and Shipman (Glasgow) reported making profits of nearly £200,000 for the 18 months from 1st April 2014 to 30th September 2015. This figure should be considered in the context not only of the private subsidy arrangement but also the Glasgow subsidiary reporting significant losses from this contract in 2013/14.

There is a wider question on the appropriateness of any profits if they have been generated in a period where reports are being presented of people being placed in unsuitable housing including reports of infestation, overcrowding and unsuitable shared accommodation.

We ask the Committee to consider the profit / loss issues in Compass from the perspective of whether there should be a no-profit rule in any extension of Compass into 2019 as well as in terms of any post-2019 contracts.

Scottish Refugee Council

November 2016