



A re-inspection of Napier Barracks

March 2022

David Neal

Independent Chief Inspector of
Borders and Immigration

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Any enquiries regarding this publication should be sent to us at

Independent Chief Inspector of
Borders and Immigration,
1st Floor, Clive House,
70 Petty France,
London SW1H 9EX
United Kingdom

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To help improve the efficiency, effectiveness and consistency of the Home Office's border and immigration functions through unfettered, impartial and evidence-based inspection.

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Email us: chiefinspector@icibi.gov.uk

Write to us: Independent Chief Inspector of
Borders and Immigration
1st Floor, Clive House,
70 Petty France,
London, SW1H 9EX
United Kingdom

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Foreword

Shortly after my appointment as Independent Chief Inspector, the first inspection report on Napier Barracks and Penally Camp was published to enable the Home Office to learn from its findings when considering future forms of asylum accommodation.¹ Nearly a year on from that report, and my first visit to Napier Barracks in April 2021, I was keen to review the improvements to which the Home Office had committed in its response. As part of this review, I visited Napier again on 23 March 2022.

This inspection found that the management and oversight of Napier have improved with the appointment of dedicated site managers for Clearsprings Ready Homes (CRH) and the Home Office. While Home Office staff are still not on site every day, I saw plenty of evidence of the strong working relationships that have developed between the Home Office, the provider, and its subcontractors.

The introduction of a 90-day maximum duration of stay is recognised by staff, stakeholders, and residents alike as a significant improvement, giving residents certainty over the time they will spend at Napier. I consider this is central to the improved atmosphere on the site. While safeguarding issues are still identified after residents arrive, the frequency of these occurrences has reduced, indicating a more stringent application of the suitability criteria before they are accommodated at the site. Staff were described by residents as “kind”, and this really matters. The security guards presented a less intimidating image, the barbed wire on the perimeter fencing had been removed, and ‘cover from view’ fencing had been installed. The onsite healthcare arrangements had been formalised but there were still significant issues in obtaining adequate dental care for the residents.

Recreation facilities had been redecorated and expanded, the cookhouse had been refurbished, and more activities were being provided. While minor improvements had been made to individual sleeping areas, I was disappointed that the overall condition of the dormitories had not improved. The residents and staff I spoke to, and stakeholders in their conversations with my inspectors, all raised the lack of privacy, the noise levels, and disruption to sleep as issues that affected everyone in the shared dormitories.

The Home Office has plans and funding to improve the dormitories and accommodate an additional 50 residents and is considering options to further increase capacity. However, no work will start until the outcome of an ongoing judicial review. It is therefore unclear whether the Home Office will make any significant changes to the site during the busy summer peak, which could further delay improvements to the dormitories.

The tools used by the Home Office, its provider, and the subcontractor to monitor resident arrivals and departures are rudimentary and do not capture safeguarding and management data requirements. There is no access to a shared platform that allows data to be updated centrally, leading to repetition and resource-intensive processes. By now, I would have expected bespoke tools to be in place that provide the functionality required for a multi-agency delivery model, incorporating best practice that can be shared across future accommodation sites.

¹ Penally Camp closed on 21 March 2021.

More generally, I would like to be able to observe a lessons learned process which captures the progress over the past year and uses it to inform core planning for future work. I am not sure that I can. I continue to search for something as basic as a template that covers the mechanics of standing up future sites, and a checklist that captures the conclusions from the journey that Napier has been on over the past year. I hope that there is one. Policymakers must place a premium on the tactical detail required to deliver future projects and recognise the need for energetic holding to account from the start of planning, to ensure that providers deliver the services they are paid for.

There has been a lot of hard work at the Napier site from the Home Office, the provider, subcontractors, and NGOs. However, even in the imperfect world in which we live, much of this work should have been done over a year ago.

This report makes 4 recommendations to the Home Secretary and was sent to her on 21 April 2022.

A handwritten signature in black ink, appearing to read 'D Neal', with a horizontal line underneath the name.

David Neal
Independent Chief Inspector of Borders and Immigration

1. Background

- 1.1** Napier Barracks in Folkestone is a former Ministry of Defence barracks which was opened as contingency asylum accommodation in September 2020. The Home Office contracted Clearsprings Ready Homes (CRH) to manage the accommodation under the Asylum Accommodation and Support Services Contract (AASC). CRH subcontracts to several other companies to provide services at the site.
- 1.2** The Independent Chief Inspector of Borders and Immigration (ICIBI) carried out an inspection of the use of former military barracks as contingency asylum accommodation between November 2020 and March 2021. The ICIBI was assisted by Her Majesty’s Inspectorate of Prisons (HMI Prisons) to carry out visits to Napier Barracks and Penally Camp in Wales, given their experience of inspecting large institutional settings, particularly during the COVID-19 pandemic.
- 1.3** The inspection report was published in July 2021 and highlighted several concerns about the establishment and operation of the camps, principally:

“the failure by the Home Office to consult local stakeholders, on whose services and support the camps would be reliant, before taking the decision to proceed with their use; inadequate assessments of the physical and mental health of those selected to be moved to the camps; poor communication with the camp residents; poor employment practices by the camp contractors at Napier Barracks; and use of insecure means to share the personal information of the Napier Barracks residents by sub-contractors.”²
- 1.4** In its response to the report, the Home Office stated that there had “been a significant amount of work at Napier to make improvements to the site, including addressing the issues that were raised in the report.”³
- 1.5** A year on from the initial inspection, the Independent Chief Inspector sought to evaluate the progress made on implementing those improvements, identify good practice, and make recommendations for further improvements to the management and operation of the site.

² [An inspection of contingency asylum accommodation: HMIP report on Penally Camp and Napier Barracks – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97442/hmip-report-on-penally-camp-and-napier-barracks-2021.pdf)

³ [Response to an inspection of contingency asylum accommodation – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97442/hmip-report-on-penally-camp-and-napier-barracks-2021.pdf)

2. Recommendations

Recommendation 1

- 2.1 Develop or procure bespoke tools to manage and track the duration of a resident's stay and the time taken to relocate vulnerable residents. The tool should be:
- hosted on a shared platform to allow Home Office, provider, and subcontractor staff to input real-time updates
 - replicable across new accommodation centres when they are established

Recommendation 2

- 2.2 Review the policy and application of the suitability criteria for residents living at Napier to provide onsite staff with the flexibility to make informed and ethical decisions on whether residents, whose vulnerabilities are identified, should continue to be accommodated there

Recommendation 3

- 2.3 Implement an assurance regime to:
- ensure that residents' personal information is shared between Home Office, provider, and subcontractor staff in accordance with the relevant data protection requirements
 - ensure that right to work and DBS (Disclosure and Barring Service) checks are conducted on provider and subcontractor staff

Recommendation 4

- 2.4 Implement standard processes by which all residents:
- are transferred to Napier, to ensure they are provided with 24 hours' notice of their transfer and information about the site in advance
 - are transferred from Napier, to ensure they are provided with notification of their transfer and their full onward address 7 days in advance, and confirmed times for transportation to their new address

3. Scope and methodology

3.1 This re-inspection reviewed the improvements the Home Office had made to the management and operation of Napier Barracks following the ICIBI/HMIP inspection of February 2021.

3.2 The re-inspection was carried out with reference to the ICIBI's expectations for inspection.⁴

3.3 Inspectors:

- reviewed the ICIBI report on the inspection of Napier Barracks and Penally Camp that was conducted in February 2021, and the Home Office's response to it
- held video conference calls with Strategic Migration Partnership⁵ representatives, non-governmental organisations (NGOs) and charities involved in the provision of services to the residents of Napier
- analysed the documentary evidence and data provided by the Home Office in response to the inspectors' evidence request
- between 23 and 25 March 2022, conducted onsite observations at Napier, and interviewed and held focus groups (via MS Teams and in person) with Home Office staff, provider staff, relevant stakeholders, and residents
- on 28 March 2022, presented their initial findings to Home Office senior management

⁴ [ICIBI expectations for inspection – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/94444/ICIBI_expectations_for_inspection.pdf)

⁵ "Strategic Migration Partnerships (SMPs) are Local Government led partnerships funded by, but independent of, the Home Office, whose role is to coordinate and support delivery of national programmes in asylum and refugee schemes as well as agreed regional and devolved migration priorities. There are 12 SMP partnerships across England, Wales, Northern Ireland and Scotland." See: [Home – EELGA SMP](#)

4. Key findings

Leadership and management

Resources and management tools

4.1 In its response to the 2021 ICIBI/HMIP inspection report, the Home Office said it had:

“appointed a Senior Civil Servant to oversee the operation at Napier and drive forward improvements to the site; a Home Office team now work on Napier oversight full time. Clearsprings Ready Homes has appointed a director to oversee operations at Napier and a full-time site manager is also in place.”

4.2 During this re-inspection, the Home Office told inspectors that it had also appointed a Grade 6 Contract Compliance Delivery Lead as the overall lead for Napier and to manage the team of 5 staff that oversees the site. Home Office staff were on site at least one day per week, clear management structures were in place and inspectors observed regular interactions between Home Office, provider, and subcontractor staff while on site.

4.3 The Home Office showed inspectors a “bespoke checklist (...) in collaboration with the provider to drive continuous improvement” at Napier. The checklist was based on one created by the ICIBI for the inspection of contingency asylum accommodation.⁶ It refers to the key requirements for the provision of Initial and Contingency Accommodation⁷ under the Asylum Accommodation and Support Services Contract (AASC), through which Napier is run under a contract change notice.⁸ When asked why the Home Office had not implemented such a checklist earlier, a senior Home Office manager told inspectors that one had been in place when the site opened but the appointment of the Home Office site manager and receipt of the report on contingency asylum accommodation provided an opportunity for a “fresh pair of eyes” to review it.

4.4 Inspectors examined documents relating to the management of the site, including the operational management plan, business continuity plan, evacuation plan, outbreak management plan and the joint risk and issues register. These were generally comprehensive and updated regularly, but inspectors noted that the onsite health staff were only provided with the revised outbreak management plan after requesting a copy. The business continuity plan had not been updated since June 2021, despite referencing a required review in September 2021. When asked for the reason behind this, the Home Office told inspectors, “The BCP approved [on] 10 June 2021 is the latest version. It was not reviewed in September, and we have taken steps to work with CRH [Clearsprings Ready Homes] to review and amend as [a] priority.”

⁶ This report was sent to the Home Secretary on 16 February 2022 but at the time of writing had not been published.

⁷ “Initial accommodation is short-term housing that can be full-board, half-board or self-catering. It is usually in a hostel-type environment. It is for asylum seekers who need accommodation urgently, before their support applications have been fully assessed and longer-term accommodation can be arranged.” See: [Living in asylum accommodation – GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/living-in-asylum-accommodation)

⁸ [Salesforce \(cloudforce.com\)](https://www.salesforce.com)

Safety

- 4.5** Significant work had been undertaken to address the fire safety concerns raised by the Crown Premises Fire Safety Inspectorate (CPFSI) that remained unaddressed at the time of the 2021 inspection. Inspectors were shown details of the remedial works, and the work itself, the enhanced fire safety training provided to staff on site, and the follow-up fire risk assessments conducted by an independent consultant in July 2021. Inspectors also examined the records of evacuation drills, fire alarm tests and fire extinguisher servicing that were now in place and regularly carried out. Inspectors noted that the accommodation block damaged by fire in January 2021 had not been repaired, but the Home Office said it had plans to refurbish it and bring it back into service as part of its strategy to increase site capacity.
- 4.6** The introduction of a maximum duration of stay of 90 days meant that residents were now accommodated at Napier for shorter periods. As part of its response to the CPFSI recommendations on mitigating fire risks, and to help mitigate COVID-19 risks, the Home Office had reduced the maximum capacity of the site from 431 to 337 in March 2021, and then to 308. Two accommodation blocks were retained for isolation in the event of an outbreak. Inspectors were told there had been 9 cases of COVID-19 among the residents in 2022, with one active case during the period of the re-inspection. Residents took a lateral flow test on arrival at Napier and were asked for details of their vaccination status, with vaccinations arranged on a regular basis. Visitors to the site only had their temperature taken but were not required to take a lateral flow test. None of the residents spoken to by inspectors raised concerns about COVID-19 safety.
- 4.7** Inspectors asked the Home Office for data on the number of residents that had been accommodated at Napier between June 2021 and February 2022, the number of days each spent at Napier, and their planned destination after they left (such as other contingency accommodation or Dispersed Accommodation (DA)).⁹ The data showed that 964 residents had arrived and 1,010 had left Napier over this period. However, the Home Office was “unable to provide details on the number of days spent at Napier” or the “details of the planned destinations of service users once they leave Napier”.¹⁰ Inspectors noted that, given the Home Office’s inability to provide such basic data, it was unclear how they assured compliance with the 90-day stay limit.

Assurance processes

- 4.8** Following the 2021 ICIBI/HMIP inspection, the Independent Chief Inspector raised concerns with the Home Office about the methods used by the provider and its subcontractor to share residents’ personal information, and the employment conditions of some onsite staff. During the re-inspection, a senior Home Office manager told inspectors that the Home Office was “doing what we are expected to do” regarding the sharing of residents’ personal information, and its subcontractor now used secure and approved methods to do this. However, they were unable to demonstrate how this was enforced or audited and said, “unless someone identifies a breach, no issues are identified.”

⁹ Described as “longer-term temporary accommodation managed by accommodation providers on behalf of the Home Office. You will normally be able to stay in dispersal accommodation until your asylum claim has been fully determined. It is not always possible to stay in the same property.” See: [A Home Office Guide to Living in Asylum Accommodation – English \(publishing.service.gov.uk\)](#)

¹⁰ Following the onsite phase of the inspection, the Home Office told inspectors that it had “recently included” ...“a tab on the live register that calculates the number of days spent [at Napier] once we have the dispersal date”. “All dispersal addresses are recorded on both CID and ATLAS systems, so available but not recorded on the live register.” “The 90 [day] target is monitored manually under scrutiny from both SBHL and HO – and although works, there is room for improvement through automation.”

- 4.9** A Home Office manager told inspectors that it was for the provider to check with the subcontractor that right to work and DBS (Disclosure and Barring Service) checks were carried out on their staff, with another saying that they had “to have a degree of trust”. Inspectors asked to see the right to work information for 2 members of the subcontractor’s staff randomly selected from the staff list. This was provided quickly by the subcontractor’s human resources department, leading inspectors to question why the Home Office did not undertake such basic assurance processes to ensure that the checks were being carried out.

Home Office communication with residents

- 4.10** The 2021 ICIBI/HMIP inspection report highlighted poor communications between the Home Office and residents at Napier. Video meetings with residents and the Home Office team overseeing the site had just started and these still took place, providing an opportunity for residents to raise issues about the management of the camp, but still did not provide information about individual asylum claims, which was one of the residents’ most important questions. Inspectors were told by non-governmental organisations (NGOs) providing services to Napier residents that residents tended not to engage in the meetings, either because the wrong interpreters had been arranged or because Home Office staff were unable to answer their questions. They questioned whether the effectiveness of the sessions had been evaluated. Home Office managers told inspectors that the meetings were voluntary and gave residents an opportunity to raise any issues they had about Napier. This meant that “Nobody could say that they didn’t have the opportunity to speak to the Home Office” and that “they wouldn’t bother if they thought no one would listen.” Another manager said, “we don’t have complaints”, as issues were picked up during the meetings and resolved.

Asylum screening interviews

- 4.11** In March 2022, the joint Home Office/Clearsprings Ready Homes issues log for the management of Napier recorded that 201 residents (two-thirds of those onsite) had not been given a full asylum screening interview. The log noted that this was making it “more difficult for the Home Office to progress their asylum interview as vital screening information has been missed or inputted incorrectly” and was causing problems with residents obtaining ARC¹¹ and ASPEN¹² cards. The Home Office onsite team had arranged for a “specialist team” to complete the interviews, estimating that this would take 26 days. However, by the time of the re-inspection, that team had been diverted to work on the Ukraine crisis and the exercise was “on hold”.
- 4.12** A Home Office manager told inspectors they had a “high degree of confidence” that this cohort of residents had been screened against the suitability criteria before being accommodated at Napier, and that the issue affected the whole asylum system and was not specific to Napier. Inspectors were concerned that Home Office staff and managers did not know what impact the delay in conducting asylum screening interviews would have on the residents’ asylum claims, and that efforts to complete the interviews had been suspended, presumably lengthening the time these residents would have to wait for an asylum decision. Inspectors observed very few substantive asylum interviews being conducted during the re-inspection, but Home Office staff did not know whether this was due to the impact of the screening interview issue or because residents’ claims had been deemed inadmissible.¹³

11 “The ARC is a credit card-sized plastic card issued by the Home Office to individuals who claim asylum. It contains information about the holder’s identity or claimed identity although it is not evidence of identity.” See: [Application registration card \(ARC\) – GOV.UK \(www.gov.uk\)](https://www.gov.uk/application-registration-card-arc)

12 An ASPEN (Asylum Support Enablement) card is a debit payment card given to asylum seekers by the Home Office.

13 “In broad terms, the Rules allow an inadmissibility decision to be taken on the basis of a person’s earlier presence in or connection to a safe third country, even if that particular country will not immediately agree to the person’s return.” See: [Inadmissibility: third country cases – GOV.UK \(www.gov.uk\)](https://www.gov.uk/inadmissibility-third-country-cases)

Safety

Arrival at the accommodation

- 4.13** On the first day of the re-inspection there were 272 residents on site, with 30 new arrivals due that day. Inspectors were told that new arrivals were not scheduled at weekends.
- 4.14** Inspectors were told by staff and residents that residents were not always given adequate notice that they were being moved to Napier or told where they were going. Some arrived thinking that they “may be in prison” or were “being deported back to France”. One resident told inspectors that he was given 2 hours’ notice of his transfer and did not know where he was going. Home Office managers told inspectors that there was a problem with asylum seekers failing to travel when told they were being transferred to Napier due to negative publicity about the site. However, once they had heard what it was like, often through friends, they frequently requested a transfer. Inspectors were told that ‘failure to travel’ caused logistical issues and that the policy around this was being reviewed, with one option being to stop asylum support for those who failed to travel.
- 4.15** Inspectors observed 2 groups of residents arriving at Napier and being warmly welcomed by subcontractor staff. Residents were treated with dignity and respect and a good rapport was quickly established.
- 4.16** Residents took a lateral flow test (LFT), were asked about their vaccination status, and offered a vaccination appointment. Health assessments were not routinely conducted but all residents were registered with a GP on arrival. They were given personal cleaning kits (with further supplies available in the storeroom) and then taken on a tour of the site by the subcontractor staff.

Safeguarding

- 4.17** Inspectors reviewed the Home Office ‘Allocation of Accommodation Policy’ which was published in May 2021 and included the suitability criteria for being accommodated at Napier.¹⁴ It applied to “single male asylum seekers with no child dependents” and said, “Women and dependent children are not suitable to be accommodated at the facility.” Additionally, those meeting any of the following criteria were not suitable:
- “they have not yet been screened
 - they have been referred to the National Referral Mechanism and it has been found that there are reasonable grounds to believe they are a victim of modern slavery or a decision on this matter is still pending (PVOT)
 - they would be defined as vulnerable under the Asylum Seekers (Reception Conditions) Regulations 2005 regulation 4(3) and have had an individual evaluation of his situation that confirms he has special needs for support under s 95 of the 1999 Act
 - they have serious mobility problems or physical disability
 - they have complex health needs within the meaning given by the Healthcare Needs and Pregnancy Dispersal Policy at paragraph 4.16
 - they have arrived in the UK within the last 14 days or have not yet completed any quarantine period required under rules relating to the Covid-19 epidemic

¹⁴ [Asylum accommodation requests – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/94444/Asylum-accommodation-requests-2021.pdf)

- the following cases:
 - they are aged over 65
 - they have a history of disruptive behaviour
 - cases being dealt with by the Foreign National Offenders – Returns command
 - they have been granted refugee status or other forms of leave to remain
 - they are awaiting removal”

4.18 Caseworkers were instructed to consider each case individually.

“...if a caseworker is unsure about whether an individual is suitable to be accommodated at the site, they should discuss the matter with a senior caseworker or manager. Those with minor medical ailments can be accommodated at Napier, but where there are serious medical issues caseworkers should refer to the Healthcare Needs and Pregnancy Dispersal Policy.”

4.19 Men who meet the suitability criteria are accommodated at Napier for a maximum of between 60 and 90 days, after which they are normally moved to DA. Where residents are relocated earlier than this (through a transfer request or because they no longer meet the suitability criteria), they are usually relocated to hotel accommodation.

4.20 Subcontractor staff told inspectors that the suitability criteria were applied effectively but that people “slip through the net”, normally because residents had not disclosed information about their vulnerability to the Home Office before they were moved to Napier. This was corroborated by the onsite medical staff, who believed that the current cohort of residents was “more appropriate to come here” than those who arrived at Napier in its first months of operation. They were confident that where a vulnerable resident was identified they would be relocated “within 24 hours” for their own wellbeing.

4.21 The Home Office provided inspectors with data which showed that, between June 2021 and February 2022, 40 residents had been identified with a safeguarding or other concern that deemed them no longer suitable to be accommodated at Napier. Most of these cases were “safeguarding” issues, but 5 were age dispute cases. The Home Office was unable to provide information regarding the nature of the safeguarding concerns, when the concerns were first raised, or how long it took to relocate the residents to alternative accommodation.

4.22 Inspectors were provided with evidence that onsite staff had undergone safeguarding training but found that awareness of the suitability criteria was inconsistent. While those with key roles in decision-making were familiar with the suitability criteria, onsite security staff and some subcontractors lacked detailed knowledge of them.

4.23 During the 2021 ICIBI/HMIP inspection it was found that a third of the residents said they had experienced mental health problems and there were concerns about a lack of investigation and action regarding safeguarding issues. In its response to that inspection, the Home Office said it had introduced onsite Migrant Help¹⁵ advisers who were “trained in identifying safeguarding needs”, and inspectors met with them during the re-inspection.

4.24 Potential vulnerability was reported via a robust system of incident reports, and mainly completed by the onsite nurse, the subcontractor’s welfare officer, provider staff, and

15 “Those seeking asylum in the UK can come to us to seek help with applying for accommodation and financial support, to report issues with asylum accommodation, and any other advice needed during their asylum journey. We also provide support during the post-decision period, whether the decision has been positive or negative.” See: [What we do | Migrant Help \(migranthehelpuk.org\)](https://www.migranthehelpuk.org)

managers. Reports were sent to the provider and Home Office safeguarding teams, who arranged further support and, where necessary, a transfer off site to alternative accommodation. In most cases, residents were moved to hotel accommodation where additional support could be put in place. However, it was considered by some onsite staff that the level of support would not be as good as that provided at Napier.

- 4.25** NGOs raised concerns that some residents deliberately did not disclose vulnerabilities as they knew that if they did, they would be moved to a hotel rather than to DA. Home Office senior managers and safeguarding staff told inspectors they did not believe that residents avoided raising such issues, and in any case, considered it unlikely that residents could hide a mental health issue as the onsite staff were very good at “picking up signs”, such as noticing if a resident was staying in their room or missing meals.
- 4.26** Inspectors were told about an incident when onsite medical and welfare staff believed that a vulnerable resident would have benefitted from remaining on site because of the support and sense of community that it provided him. They were over-ruled, and the resident was moved off site. Inspectors discussed this incident with a senior Home Office manager who was not aware of the case but described the situation as a possible “unintended consequence” of the suitability criteria policy. Despite the decision to remove the resident in this case, the manager was encouraged that conversations were being held about ethical decision-making. The manager suggested that the Home Office could review the policy of automatically relocating residents if they no longer met the suitability criteria, and that cases could be considered on a case-by-case basis.
- 4.27** Inspectors were told that transfers of those with an identified vulnerability should be completed within 48 hours of being identified, but normally took place on the same day. While still on site, vulnerable residents were checked by security guards every 30 minutes.
- 4.28** Security staff told inspectors that they had undergone safeguarding and ligature training and inspectors observed that they carried ligature knives (hooked knives specifically designed to release a ligature safely). They said that they had previously seen “lots of self-harm” among the residents but this was no longer the case.
- 4.29** Home Office senior managers and safeguarding staff told inspectors that a fortnightly multi-agency forum (MAF) met to discuss safeguarding and other issues arising at Napier and its impact on the local community and services. Forum members include the police, fire services and the local council.

Personal safety

- 4.30** Prior to the re-inspection, one stakeholder told inspectors that they had received reports of residents being threatened by staff, but no such incidents were raised with inspectors by residents or NGOs while they were on site. Staff were observed being courteous and friendly to the residents, who said that they were “treated kindly” and “in a respectful way”. Inspectors found the atmosphere in Napier to be calm. One resident said that he did not feel safe as his luggage could be stolen while he slept, but inspectors noted that each resident was supplied with a lockable cabinet in their sleeping area.

Legal rights

- 4.31** The onsite Migrant Help supervisor told inspectors that his role was to provide advice and support, such as problems with ARC and ASPEN cards, providing details of legal representatives to residents, referring safeguarding issues to the welfare officer, liaison with charities and NGOs who wanted to provide services on site, and to signpost residents to those who could assist with their issues.
- 4.32** Stakeholders told inspectors of their concerns about the availability and quality of the legal representatives to whom residents were referred. The Home Office AIRE (Advice, Issue Reporting and Eligibility Support) contract with Migrant Help states that they should provide advice and guidance to residents before their screening and substantive interviews, and after their asylum decision: “information on the availability of legal advice and representation and signposting of Service User’s (sic) to the Legal Aid Agency, where appropriate”.¹⁶
- 4.33** A Migrant Help senior manager told inspectors that Migrant Help staff were unable to recommend legal representatives. Before the COVID-19 pandemic, they had advised residents to use local legal representatives and they had been provided with details of 12 firms by the Legal Aid Agency when Napier was established. Legal representatives were now “supporting clients on a national basis” and, while there might be a specific issue with availability in Kent, they said that residents should be able to access legal provisions as people could now work nationally. A legal clinic was sometimes held by a local NGO on a Friday to assist residents to register with a legal representative, but the clinic had not operated every week.
- 4.34** The Home Office said that residents with admissible claims had their asylum interviews conducted by video conference at Napier and were given 4 weeks’ notice of their interview. This provided time for residents to contact Migrant Help if they needed assistance to register with a legal representative and to prepare for the interview. Inspectors were told by Home Office managers that there was no issue with legal representatives being given permission to enter the site.
- 4.35** Inspectors observed only a small number of substantive asylum interviews being conducted during the re-inspection. Migrant Help staff estimated that 15 to 20 interviews were taking place per month.
- 4.36** Napier residents were unable to obtain updates about their asylum case directly from the Home Office and had to do this via their legal representative. Migrant Help told inspectors that residents at Napier could not be seen to receive “preferential treatment from the Home Office” in this regard, or be “fast tracked”, as they had to follow the same process as other asylum seekers.¹⁷

¹⁶ [Salesforce \(cloudforce.com\)](https://www.salesforce.com)

¹⁷ “Ask your legal adviser if you want an update on your application.” See: [Claim asylum in the UK: Get a decision – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/claim-asylum-in-the-uk-get-a-decision)

Respect

Accommodation

- 4.37** The 2021 ICIBI/HMIP inspection report found that the Napier site was dilapidated and in poor condition. Despite some superficial improvements, the re-inspection found that the site still had a neglected appearance, with paint peeling from walls, ceilings, and doors in many areas. However, external areas were tidy and well kept. Photographs of the site can be found at Annex A.
- 4.38** The Home Office showed inspectors a checklist it used to ensure that provision of the accommodation was in line with the Asylum Accommodation and Support Services Contract (AASC). Maintenance logs were used to record issues and progress and inspectors were told that the Home Office, provider, and subcontractor held monthly contract meetings. They also met twice weekly and were in daily contact.
- 4.39** The 2021 ICIBI/HMIP inspection found that subcontractor staff were sleeping on site, but this was no longer the case and inspectors observed that accommodation used for this purpose had been taken out of service.
- 4.40** The 2021 ICIBI/HMIP inspection also found the sleeping accommodation to be in a poor condition and unfortunately there had been little improvement. Some blocks had single and twin rooms and other blocks had 2 sections of dormitory-style accommodation housing up to 12 men on each side of shared toilet and shower facilities. Additional shower and toilet blocks were positioned between the dormitory buildings. Despite the provision of flimsy partitions and curtains, the issues of privacy, noise and the resulting lack of sleep remained. Sleep deprivation was a problem that was consistently raised with inspectors by residents, staff, and stakeholders. New mattresses had been provided since the 2021 ICIBI/HMIP inspection and bedding was being changed once a week. A new laundry has also been provided for the residents.
- 4.41** In its response to the 2021 ICIBI/HMIP inspection, the Home Office had undertaken to provide electric sockets for each sleeping area, and inspectors found this to be the case. It also said that “Individual lights have been provided to enable individuals to control the light around them at night.” Inspectors found that this was not the case in the first dormitory they inspected. The reason given was that the residents had not wanted lamps and they had all been removed. Inspectors were later told that this was an error, and the procedure should have been to provide a lamp for all new arrivals who could return them to the central store if they were not wanted.
- 4.42** Residents could complete an initial accommodation satisfaction survey by means of a QR code on the wall of each block. Inspectors were not provided with evidence of how this information was used to monitor accommodation issues.¹⁸
- 4.43** Inspectors noted that the showers and toilets were clean and functional, with privacy curtains provided in the shower areas. With the addition of prefabricated shower and toilet facilities between the dormitories, toilets were provided on a ratio of 1 to every 3 residents. Cleaning

¹⁸ Following the onsite phase of the inspection, the Home Office told inspectors that the survey would not “be specific to Napier, or indeed any specific site. The survey is used to inform areas of service delivery so that areas for improvement can be identified” and, “They’re not intended to identify individual issues and couldn’t do so as they’re completely anonymous. Individual issues need to be raised via Migrant Help as issue reporting, complaint, request for assistance or feedback.”

was carried out twice a day and there was sufficient provision of soap and hand sanitiser around the site (although wall-mounted sanitiser dispensers were not always refilled).

Activities

- 4.44** Inspectors noted that there were several indoor recreation areas on site (containing sofas, TVs, pool tables, table tennis tables and air hockey), a large gym, a classroom, a library, an art and music room, and a seating area within the temporary Migrant Help office (the main office was undergoing refurbishment). Some of these areas had recently been redecorated.
- 4.45** A multi-faith room was available, and the subcontractor employed a spiritual and pastoral team (8 staff in total) that visited all their sites. They told inspectors that they visited Napier once a month or as often as required, leading prayers or just to talk to residents. An NGO also told inspectors that they provided a chaplaincy service. Inspectors observed that Friday prayers on site were well attended by residents.
- 4.46** During the re-inspection, many residents spent much of their time outside in the good weather. Facilities for football, basketball and volleyball were available and inspectors observed a weekly football tournament and awards ceremony that residents seemed to enjoy.
- 4.47** Many of the activities on site were run by NGOs and charities, some of whom were critical of the process to gain access to the site, citing “lots of red tape to go through”. The Home Office provided inspectors with its recently updated NGO Guidance document that had been published shortly before the re-inspection. The aim of the document was to make the approval process and expectations for providing onsite services clearer for all parties, while regulating access to the site for the safety and security of the residents.
- 4.48** Despite the valuable contribution these NGOs and charities made to the calm atmosphere at Napier, some told inspectors that Home Office staff had never engaged with them. Inspectors raised this with Home Office managers, who said they were keen to see what more potential there was for NGO engagement and collaboration. Inspectors concluded that, given the value they could add to the smooth running of the site, NGOs and charities should continue to be engaged and included in any plans to increase the number of residents at Napier, or the opening of future asylum accommodation centres.
- 4.49** Some NGOs told inspectors that there was no budget for recreation facilities on the site and that when equipment was damaged it was not replaced. The Home Office site manager told inspectors that damaged equipment (such as footballs or the pool tables) was mended or replaced and there was a service contract in place for the gym equipment. Inspectors noted that the facilities and equipment appeared to be in good order. In addition, a local charity financed 5 passes for a local gym that were available for residents to borrow. It also organised trips to the local sports centre.
- 4.50** The same charity hosted English lessons twice a week and daily drop-in sessions on weekdays. Some residents with a good standard of English ran classes for other residents. The charity also arranged involvement in voluntary activities in the local community for residents.
- 4.51** Inspectors spoke to a local social enterprise that came on site twice a week to host a running group. They had also distributed running shoes to the residents and organised cycling sessions. The running club was a way for residents to meet people from the local community who also took part in the running sessions.

- 4.52** Residents could also take part in art projects (Migrant Help were running a tile painting session while inspectors were on site), gardening, voluntary activities such as litter picking, beach cleaning and renovating local footpaths. Inspectors were told that music workshops had recently been run on site and they witnessed impromptu singing and dancing by residents outside their dormitory.
- 4.53** Residents were free to leave Napier, and a free return bus service to Folkestone operated twice a day.
- 4.54** The Home Office funded a police liaison officer who worked at Napier and 2 local asylum accommodation hotels. He took residents off site for football matches, developed positive relationships with residents, and hosted awareness sessions that he had designed on anti-social behaviour, British society, knife crime, and drugs and alcohol. He told inspectors that it would be useful to have more guidance and input from the Home Office as to its expectations of his role. NGOs told inspectors that they were concerned by the image created by a police officer delivering these sessions. Inspectors noted that the subcontractor had also developed their own session on UK values.
- 4.55** There were 4 interview rooms at Napier. Inspectors found them to be basic, with hard plastic chairs and poor-quality flooring which was ripped and coming away from the floor in some areas. Wifi routers enabled residents to connect to the internet for their asylum interviews. Soundproofing had been added to the walls, but it did not cover the doors (including an adjoining door between the 2 rooms that the inspectors used), and inspectors noted that it was possible to hear what was being said in the adjacent room. This had the potential to inhibit residents from disclosing sensitive information at interview for fear of being overheard, an issue that stakeholders had raised with inspectors. In mitigation, the Home Office onsite manager told inspectors that only a small number of interviews were being carried out. The provider onsite manager said they tried to use interview rooms that were diagonally opposite one another when more than one interview was being conducted.
- 4.56** Wifi was available throughout Napier, but residents and NGOs told inspectors that reception was patchy depending on the location within the site.

Catering

- 4.57** Inspectors were told by residents, staff, and NGOs that the food at Napier was of good quality and served in sufficient quantities. There had been complaints about food in the past, but inspectors noted the challenge of satisfying such a diverse range of preferences. Residents were encouraged to complete a survey, available via a QR code on the dining room tables, that provided a feedback mechanism for the caterers. Inspectors were told that this resulted in an 80% satisfaction rating, but they did not know the number of residents in possession of a mobile phone and did not see the details of the survey results. Inspectors were told by onsite provider staff that details of residents who attended the canteen for lunch and dinner were recorded to enable those who were not eating to be identified in case they had an illness or other welfare issue.
- 4.58** Water, tea, and coffee were always available to residents in each block. They were also able to obtain snacks and fruit from the central storeroom from 3pm to 5pm each day.

Respectful treatment

- 4.59** Residents told inspectors that they were treated “with respect” by staff and “they ask if you need help”. They found staff to be “helpful and friendly”, saying the best things about Napier were “food and staff”. They also said that staff were “kind”.
- 4.60** Residents were free to travel in and out of Napier and could stay off site for up to 7 days but had to provide details of where they were going. Records were kept of their movements in and out of the site by the security staff. If they stayed out past midnight and had not notified the security staff that they would be staying elsewhere, the security staff would inform the administration team, who would call the resident to check on their welfare. Residents were not permitted to have social visitors on the site.
- 4.61** Where possible, residents were spoken to in their own language and many of the staff spoke several languages. If required, a telephone translation service was available, with instructions for its use available throughout the site. Signage and information were widely available in the 10 most common languages on the site.
- 4.62** The provider safeguarding manager told inspectors that there were occasional “conflicts and disagreements” between residents, but the level of such issues was “nothing” compared to the situation seen previously. Residents confirmed this and said there were no fights between residents.

Feedback and complaints

- 4.63** Inspectors were told that weekly calls between the Home Office and residents from each block were conducted via laptop, during which residents could raise any issues about the provisions and management of the camp. They were also able to raise any problems through the onsite Migrant Help staff or the subcontractor’s onsite welfare officer. The onsite staff attempted to resolve issues locally (such as helping residents apply for an ARC card) but could escalate issues or complaints through incident reports which were logged and highlighted to the Home Office.
- 4.64** Residents could also contact Migrant Help via their telephone helpline to make a complaint, but there could be long waiting times (up to an hour) during peak hours. A senior Migrant Help manager told inspectors, “In the early days, it would have been about dorm-style accommodation and food. Now we don’t get any calls about food. We don’t hear negative things.”

Healthcare

COVID-19

- 4.65** The Home Office response to the 2021 ICIBI/HMIP inspection made clear that, in relation to COVID-19, “the same regulations apply to asylum seekers as the general population” and residents “accommodated at Napier are not detained but are expected to comply with Covid regulations in place at the time”.
- 4.66** Government guidance at the time of the re-inspection was that individuals were not legally required to self-isolate if they tested positive for COVID-19 but were advised to stay at home and avoid contact with other people.¹⁹ When a resident tested positive for COVID-19, they were requested to self-isolate in line with the current guidance (although this could not be enforced) in accommodation set aside for this purpose. Inspectors noted the concerns of the onsite health staff about plans to return 1 of the 2 isolation blocks to general accommodation use. A local government stakeholder also told inspectors that COVID-19 management remained a concern.
- 4.67** Hand sanitising stations were installed at entrances and exits to communal areas, and while inspectors noted these were not always full, additional bottles of hand sanitiser were plentiful and could be found on tables in communal areas such as the canteen and recreation rooms.
- 4.68** Senior Home Office and provider staff on site advised that the site had arranged “vaccine hesitancy talks” and that vaccine take-up was encouraged.

Physical and mental health

- 4.69** A nurse practitioner was available on site from Monday to Thursday, from 9am to 5pm. They were contracted to the local GP surgery and the regional Clinical Commissioning Group. Their job description was the same as a nurse practitioner at the surgery, and the Napier site functioned as an outreach facility to the surgery. The surgery provided staff cover on Fridays, either via telephone or sometimes through a GP attending the site for part of the day. The same arrangements applied to cover staff absences at the site. An administrative assistant attended the site when new residents arrived and ensured that they were registered with the surgery.
- 4.70** Residents were not routinely assessed by the nurse practitioner on arrival as this was not a requirement of their role. Residents were asked to declare any health issues and advised how to access healthcare on the site. Blood tests and x-rays to screen for tuberculosis were arranged for new arrivals who had arrived from or travelled through high-risk countries.
- 4.71** To access the onsite healthcare, residents visited the nurse practitioner’s office and were asked to summarise their medical issue. They were usually given an appointment on the same day or within 24 hours if that was not possible. Appointments lasted for 30 minutes as residents frequently presented with a number of issues, and an interpretation service was used. The nurse was able to make onward referrals to the GP or other facilities including mental health provision, which they described as “the whole primary care package”, having developed links with them since the site opened.

¹⁹ [Coronavirus \(COVID-19\): guidance and support – GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/coronavirus-covid-19-guidance-and-support)

- 4.72** Inspectors heard concerns from NGOs operating at Napier that residents were unable to approach the GP's surgery directly, but always had to do so via the onsite nurse. The nurse explained that residents could go direct to the local surgery, but they had to go through triage with a call back from a clinician. If the nurse was on site at Napier, they provided that function. They said that residents were "entitled to a second opinion like anyone else".
- 4.73** The nurse practitioner told inspectors that residents' medical records were usually available as most had previously been registered with a GP. Where this was not the case, residents frequently had the paperwork with them which the nurse could summarise on the GP's system. NGOs operating at Napier raised concerns regarding external medical appointments that were missed when residents moved on from the site. The onsite nurse acknowledged this and said that all they could do was "tell them [residents] how to access GP services where they're moved to and ask them to make that appointment locally."
- 4.74** All parties involved in the management of the site and NGOs providing services on site agreed that provision of dental care was an issue, although this reflected the national situation. A dental charity attended the site monthly but its most recent visit was cancelled due to COVID-19. The charity could only see around 10 residents on each visit. This was insufficient as residents tended to have disproportionately high dental needs due to their long journeys to the UK and poor diet *en route*. Home Office staff told inspectors that they were seeking to improve dental provision on site, but in the meantime, residents were advised to ring 111 or an emergency dentist line if urgent care was required. Similar issues existed with the availability of opticians' appointments, with an NGO that provided services to Napier telling inspectors that some opticians refused to see residents as "double appointments are required so that extra time is available for translation/interpretation".
- 4.75** Transport to and from medical appointments was also an issue. The nurse practitioner reported that there were usually 2 to 4 residents requiring transport to appointments each day, but this could rise to as many as 7. A dedicated onsite driver had been replaced by a taxi firm based a considerable distance from the site, which often arrived late to collect residents. Subcontractor staff gave an example of a resident whose taxi arrived 4 hours late, requiring Home Office authorisation to reimburse them for the provision of alternative transport. The subcontractor staff raised concerns that costs played a part in this change to the transport arrangements.

Preparation for leaving the accommodation

- 4.76** The Home Office and the subcontractor each had separate systems in place to identify residents that had been accommodated at Napier for 60 days, so that the process of relocation could begin at day 65. The aim was to ensure that moves to DA occurred before the 90th day of a resident's stay. These systems were simple Excel spreadsheets that recorded residents' personal data, with key columns for their arrival date at Napier, and their 90th day at the site. Home Office and subcontractor staff were unable to access each other's spreadsheets, so they had to email each other a copy of their own versions each day. The receiving party then manually checked and transferred data as necessary onto their own versions.
- 4.77** The spreadsheets were filtered by date and checked daily to identify residents eligible to start the dispersal process. While the Home Office was unable to provide data on the length of time residents spent at Napier, inspectors were told by Home Office staff that they were "absolutely confident" that between June 2021 and February 2022, only 2 residents had exceeded the 90-day time limit. This had only been for 1 or 2 days in each instance and had occurred in agreement with the residents concerned due to their individual circumstances. The success of meeting the 90-day dispersal target was supported by subcontractor staff, who said the "system in place works well" and that they "wouldn't like it to change". Inspectors did not observe anything to contradict these assertions but noted that neither the Home Office nor the subcontractor were able to provide data in support of their statements that the 90-day target was met, or details of the planned destinations of residents after they left Napier.
- 4.78** While it was clear that restricting the duration of the residents' stay was taking place, the process for providing notice to residents about being moved off site was inconsistent. Inspectors were told by Home Office staff that residents usually received around one week's notice of their move and were told the area they would move to but not given the address until the day they left. However, subcontractor onsite staff told inspectors that the amount of notice provided was dependent on the provider of the DA, and no formal notice of their move was provided to residents by the Home Office. While residents moving to DA in one of the AASC provider's areas received one week's notice by letter, including the address and postcode of their next accommodation, those moving to DA in the other 2 providers' areas sometimes only received 2 days' notice, and were only told the region they were going to. Actual addresses were received the night before the move. A list of upcoming transfers was displayed in the window of the subcontractor's office, and residents checked this to find out when they were due to be moved.
- 4.79** Issues with transfer transport were also reported by the subcontractor, who reported that transfer transport to 2 of the providers' areas turned up with no warning, giving residents little notice of the time of their departure from Napier.
- 4.80** The view of the subcontractor onsite staff was supported by the onsite NGOs and residents. Residents told inspectors, "You don't have any information about when you leave." Several organisations supporting residents on site told inspectors that the short notice provided created difficulties linking residents with healthcare providers and organisations that could help settle and integrate them into their new area.
- 4.81** One stakeholder told inspectors that residents were entitled to £8 a week while at Napier, and that this amount increased when they were moved to DA. However, the increased payment was not received until the Monday following their move, and the late notification of their

onward address made it difficult to signpost residents to local food banks which could help residents struggling to buy food pending receipt of their increased allowance.

- 4.82** A senior provider manager told inspectors that while residents wanted to leave, some were “daunted” by the prospect. A stakeholder told inspectors that at Napier, all a resident’s needs were met, and as they did not know what to expect at their next location, they were “almost set up to fail”.
- 4.83** The Home Office response to the initial report on Napier said that it “aimed to better manage the expectations of service users and provide a degree of certainty” through implementation of the 90-day limit. It also said that this would enable it “to give residents more notice of any planned moves”. However, inspectors found that the process for leaving Napier was inconsistent and that the Home Office had more work to do to improve the notice period and information provided to residents in advance of their planned moves.

Annex A: Photographs



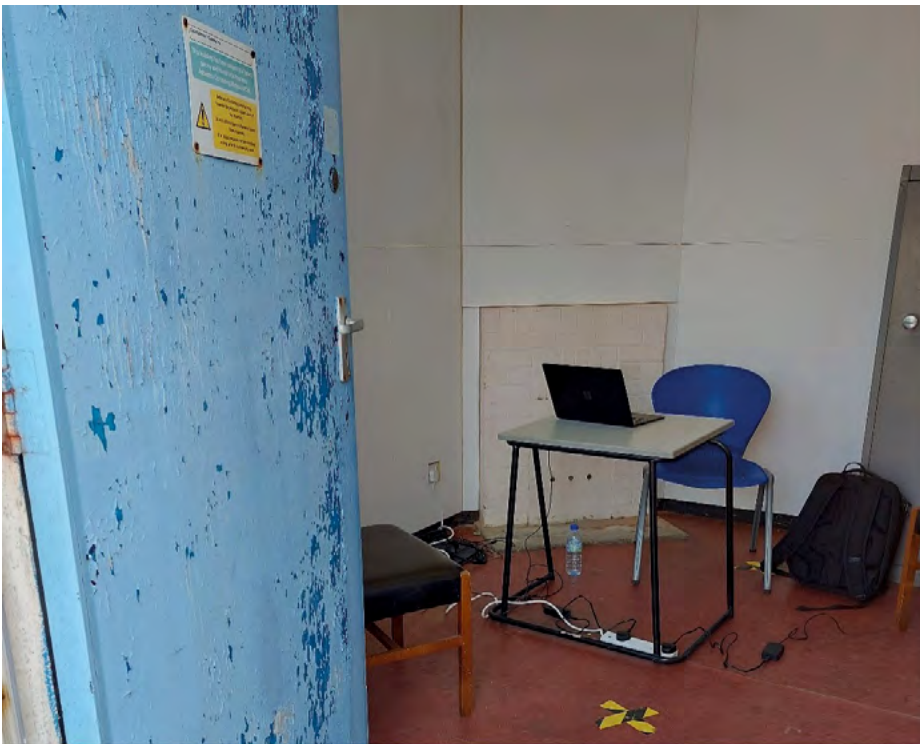
View of accommodation blocks



Resident sleeping area



Showers in dormitory block



Interview room



Classroom



Gym



Recreation room



Library

Annex B: Role and remit of the Independent Chief Inspector

The role of the Independent Chief Inspector of Borders and Immigration (until 2012, the Chief Inspector of the UK Border Agency) was established by the UK Borders Act 2007. Sections 48-56 of the UK Borders Act 2007 (as amended) provide the legislative framework for the inspection of the efficiency and effectiveness of the performance of functions relating to immigration, asylum, nationality and customs by the Home Secretary and by any person exercising such functions on her behalf.

The legislation empowers the Independent Chief Inspector to monitor, report on and make recommendations about all such functions, in particular:

- consistency of approach
- the practice and performance of listed persons compared to other persons doing similar activities
- the procedure in making decisions
- the treatment of claimants and applicants
- certification under section 94 of the Nationality, Immigration and Asylum Act 2002 (c. 41) (unfounded claim)
- the law about discrimination in the exercise of functions, including reliance on section 19D of the Race Relations Act 1976 (c. 74) (exception for immigration functions)
- the procedure in relation to the exercise of enforcement powers (including powers of arrest, entry, search and seizure)
- practice and procedure in relation to the prevention, detection and investigation of offences
- the procedure in relation to the conduct of criminal proceedings
- whether customs functions have been appropriately exercised by the Secretary of State and the Director of Border Revenue
- the provision of information
- the handling of complaints
- the content of information about conditions in countries outside the United Kingdom, which the Secretary of State compiles and makes available, for purposes connected with immigration and asylum, to immigration officers and other officials

In addition, the legislation enables the Secretary of State to request the Independent Chief Inspector to report to her in writing in relation to specified matters.

The legislation requires the Independent Chief Inspector to report in writing to the Secretary of State. The Secretary of State lays all reports before Parliament, which she has committed to do within 8 weeks of receipt, subject to both Houses of Parliament being in session. Reports are published in full except for any material that the Secretary of State determines it is undesirable to publish for reasons of national security or where publication might jeopardise an individual's safety, in which case the legislation permits the Secretary of State to omit the relevant passages from the published report.

As soon as a report has been laid in Parliament, it is published on the Inspectorate's website, together with the Home Office's response to the report and recommendations.

Acknowledgements

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Re-inspection team members

Lead Inspector: Chris Green

Inspector: Louise Milligan

Inspector: Rachael Wood

Inspector: Katie Kennedy



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