

#### Equality Impact Assessment [EIA]

#### 1. Name and outline of policy proposal, guidance, or operational activity

Wethersfield Site – Delivery of the Wethersfield site aligns with and supports all strategic objectives of the Asylum and Protection Transformation programme – (1) a flexible, sustainable, efficient system, (2) customer journey optimisation, (3) strong partner and public trust, and (4) improved colleague experience

#### Policy background and intention

The Home Office is currently accommodating nearly 50,000 people in hotels across the UK consisting of over 41,000 asylum seekers and around 9,200 Afghans. The total cost to taxpayers of hotel accommodation across both cohorts is more than £6.8m per day; asylum seekers - £5.6m and £1.2m for Afghans.

Due to continued pressure on asylum accommodation, the Home Secretary has requested 40,000 additional beds in the next calendar year. Given the likely sustained demand for asylum accommodation, capacity that can be set up at pace is urgently required.

There are statutory obligations for asylum seekers which the Home Office has obligations to fulfil. The Immigration and Asylum Act 1999 sets out legal obligations to support asylum seekers who would otherwise be destitute. That support is the provision of adequate accommodation and/ or subsistence to meet essential living needs.

The Home Office has been developing proposals to utilise Royal Air Force (RAF) Scampton and (Ministry of Defence, Police and Guarding Agency (MDPGA)) Wethersfield for asylum accommodation.

The current proposed inflow point is new arrivals after completion of screening. Under current plans, information captured during screening will need to be used to assess suitability of individuals for the site and specifically to shared sleeping quarters, which will be further validated based on information gathered in the application process. There will also be procedures in place so that ongoing suitability concerns can be identified and appropriately acted upon. The exact process, roles and responsibilities for this are being defined, and will be reflected in the Allocation of asylum accommodation policy (accessible) - GOV.UK (www.gov.uk) to ensure they take account of our obligations under caselaw.

It has been agreed by the Minister for Immigration that the sites will accommodate Single Adult Male (SAM) asylum seekers. This decision was made based on SAM's being the largest proportion of individuals entering the support system for the first time after arriving in the UK. It was also deemed most suitable to these particular sites, which are located in rural areas, so as not to impact so significantly on local services such as schools and healthcare provisions.

The accommodation at Wethersfield will not be an immigration detention centre and the induction process will make clear to new arrivals that they are free to come and go as they wish.

Departures from the sites will primarily be into more traditional dispersal accommodation, either when the asylum claim decision is ready to be served (i.e.

decisions not served on site) or if there is a change to ongoing suitability of the individual to be accommodated at the site. Maximum length of stay onsite is currently being considered, and will depend on the exact specification of the accommodation and services available onsite.

We intend to use the Wethersfield site for asylum accommodation for as long as it remains expedient to do so. For the first year of use, we intend to rely on emergency planning law provisions available to the Crown to obtain planning permission. Thereafter we would propose to regularise the planning law position more formally, considering what other sites or what other accommodation is available to house the supported asylum-seeking population at that point in time.

This EIA is a living document; we will keep equalities impacts under review as proposals develop for the site, and as the site starts and continues to be used.

#### MDPGA Wethersfield

The Wethersfield Site is a MOD facility, consisting of two main areas, the main camp and the airfield. The main camp has recently been used as the headquarters and training centre of the MoD Police. Additionally, there is an Essex County Fire and Rescue Service training facility on the north side of the airfield.

Main Camp: The area of the main camp available consists of approximately 15 Ha (36 Acres) and includes six barrack blocks sufficient for around 800 beds which have been in recent use and will require minimal work to convert to asylum accommodation standards. There is minimal requirement for renovation merely the confirmation of statutory compliance (utilities certification etc) and the installation of furniture. There are a further two blocks currently fitted as offices however it is estimated that these could be returned to accommodation standard providing a further c.400 beds, providing c.1200 in total. There is sufficient hard standing area on the camp to provide a further c.500 bedspaces in modular accommodation allowing utilisation of the central catering and welfare facilities to a site total of 1700. As a legacy of the US Air Force's occupation of the site there is significant leisure and sporting facilities in good condition together with other buildings that could be utilised for additional service provisions. To the South of the main camp, and within the same compound, there are a number of SFA houses which are still occupied by UK service families.

Airfield: The site's total area is approximately 40 (ha) 100 acres in total, of which approximately 10 ha, 22 acres is hard standing (former runways / taxiways etc), it is not currently intended to use this for Home Office purposes.

The site is located approximately 7 miles North of the town of **Braintree**, and 12 miles North East of Stansted Airport.

## Summary of the evidence considered in demonstrating due regard to the Public-Sector Equality Duty.

The public sector equality duty under s.149 of the Equality Act 2010 requires that in exercising their functions public authorities must have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Under s.149 the nine specified protected characteristics are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race (including ethnic or national origins, colour or nationality); religion or belief; sex; and sexual orientation.

Schedule 18 to the Equality Act 2010 sets out exceptions to the public sector equality duty. In relation to the exercise of immigration and nationality functions, s.149(1)(b) – advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it – does not apply to the protected characteristics of age, race (insofar as it relates to nationality or ethnic or national origins) or religion or belief.

Schedules 3 and 23 to the Equality Act 2010 permit the authorisation of discrimination in relation to age, nationality, national or ethnic origins, or place or duration of residence in certain circumstances. This includes where the discrimination is authorised by the Immigration Rules.

Direct discrimination is treating someone less favourably because of one or more protected characteristics, and indirect discrimination is doing something in a way that has a less favourable impact on someone who shares a protected characteristic than it does on others who do not share it, unless that treatment is objectively justified. The test to be applied is whether an individual would have received the less favourable treatment if they did not have the protected characteristic.

Schedule 3, paragraph 26 to the Equality Act 2010 includes an exemption from the prohibition of direct discrimination on the basis of sex when providing separate public services if a joint service for persons of both sexes would be less effective, and the limited provision is a proportionate means of achieving a legitimate aim.

Further, detailed consideration in relation to this specific proposal is given to each of the characteristics below.

#### Sources:

- Published statistics on the asylum population: <u>Asylum and resettlement</u> datasets - GOV.UK (www.gov.uk)
- Internal Home Office Management Information
- Policy guidance: Allocation of Accommodation Policy Allocation of asylum accommodation policy (accessible) - GOV.UK (www.gov.uk)
- · Asylum support policy guidance:
- https://www.gov.uk/government/collections/asylum-support-asylum-instructions
- Service Specification:
- AASC Schedule 2 Statement of Requirements.pdf (parliament.uk)
- Engagement with other government departments and relevant public bodies including DHSC, NHS England, UKHSA, MoJ, MoD.

# 3a. Consideration of limb 1 of the duty: Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010 (the 2010 Act).

#### Age

All decisions to provide accommodation to an adult asylum seeker are made on a needs basis, regardless of age. Consideration of whether an asylum seeker is destitute is based on establishing fact and evidence.

Direct and indirect indiscrimination in respect of age has been considered. The accommodation at Wethersfield is for those over the age of 18 (it is not set up to

meet the needs of families with children or unaccompanied asylum-seeking children who are under the legal care of local authorities) and the suitability criteria sets out that those over the age of 65 would not be suitable because as a general rule the elderly are more likely to have a vulnerability that means they are unsuitable for some forms of accommodation – for example because they cannot share rooms.

Wethersfield will only be used to accommodate single adult males, which is the greatest proportion of individuals entering the support system for the first time after arriving in the UK. As per the published asylum population statistics, in general this group are in their early twenties.

As only those between the ages of 18 and 65 would be accommodated at Wethersfield, the policy gives rise to direct discrimination on the ground of age as those under 18 and over 65 are precluded. However, s.13(2) of the 2010 Act provides an exception in relation to this protected characteristic, if the treatment is justified as a proportionate means of achieving a legitimate aim. The policy aim is to ensure we meet our legal obligations to accommodate asylum seekers who would otherwise be destitute and to enable the move away from accommodating individuals in hotels, which is expensive and unsustainable. There is a greater need to accommodate male asylum seekers in the 18-65 age range, therefore we are achieving a clear and legitimate aim.

The accommodation provided at Wethersfield will be a similar standard to other existing asylum accommodation. Therefore, the treatment of the age profile of those who might be accommodated at Wethersfield will not be materially different to those already being housed in similar types of Home Office accommodation.

The proposal is considered to be directly discriminating in relation to age.

#### Sex

The accommodation and support arrangements at Wethersfield are only used to accommodate adult males. In that sense, there is differential treatment between males and females arriving in the UK in that males may be provided with accommodation and support at Wethersfield and females will not. However, female asylum seekers with the same need for accommodation and support will be provided with equivalent assistance at an alternative initial accommodation centre or hotel. There is therefore direct discrimination on the basis of sex. However, schedule 23(3) of the 2010 Act permits sex discrimination in relation to communal accommodation. "Communal accommodation" is defined as "residential accommodation which includes dormitories or other shared sleeping accommodation which for reasons of privacy should be used only by persons of the same sex" (para.3(5)). Wethersfield therefore falls under this definition.

In applying this exemption, account must be taken of paragraph 3(3) of schedule 23 and a) whether and how far it is reasonable to expect that the accommodation should be altered or extended or that further accommodation should be provided, and (b) the frequency of the demand or need for use of the accommodation by persons of one sex as compared with those of the other. The sleeping quarters available at the site range from single and double rooms to group rooms up to 6 people, depending on whether it is the existing accommodation which is used or modular accommodation. In theory it is possible to have a mixed site and have females only and male only blocks. However, the majority of asylum seekers are male. Suitable facilities for children are currently unavailable at the site. As there are far more male asylum seekers than females and many of the female claimants have children, it has been decided that is appropriate to use the site for male asylum seekers only.

In relation to demonstrating that the accommodation is managed in a way that is as fair as possible to both men and women (schedule 23 para 3(2)), we are considering measures to ensure that as far as possible the accommodation is comparable to other asylum accommodation. In this respect, we will ensure that the service on site is the same i.e. full board service, access to transport, access to NHS healthcare.

The proposal is considered to be directly discriminating in relation to sex.

#### Race

The future operation of Wethersfield will accommodate Single Adult Males from various countries and backgrounds are therefore not considered to be directly or indirectly discriminating in relation to race. Either from those living on site, or to other cohorts who are all accommodated in suitable accommodation.

However, regardless of nationality and race, all decisions on whether to accommodate an individual will be on an individual basis as set out in the Allocation of asylum accommodation policy (accessible) - GOV.UK (www.gov.uk) and the Asylum Accommodation and Support Contracts Statement of Requirements. Consideration of whether an asylum seeker is destitute is based on establishing fact and evidence. Those who are not deemed suitable will be provided with suitable accommodation within the existing estate.

The proposal is not considered to be directly or indirectly discriminating in relation to race.

#### Religion or Belief

The Home Office does not collect data about the religious beliefs of those applying for asylum support. However, by virtue of the profile of the top nationalities receiving support (as set out in Published Statistics on Asylum Seekers) a significant proportion of those individuals will identify as Christian or Muslim, though the proportion that practice their religion and to what extent is not known.

All decisions to provide accommodation to an adult asylum seeker are made on a needs basis, regardless of religion. Consideration of whether an asylum seeker is destitute is based on establishing fact and evidence.

The standard service specification for those in initial accommodation requires culturally appropriate food to be provided (for instance Halal meat for Muslims). Facilitation of the practice of religion will take into account the diverse culture and religious background of the resident and meeting of their spiritual needs as far as practicable. The site will therefore need to make available dedicated, segregated onsite faith and worship rooms.

The accommodation at Wethersfield will include a dedicated multi-faith building to be used by those who follow a particular religion or belief. The multi-faith building will be divided into multiple rooms to enable individuals to undertake different religious or belief activities throughout the day. The site will also contain discreet markers pointing towards Mecca. The requirements that are placed upon the provider operating the site also sets out that religious material sufficient to meet the needs of the population, relating to the religion of Service User are to be available for personal use.

Should an individual choose not to use the multi-faith rooms, the provider will be offering free shuttle services to locations where they can use existing religious buildings to practice their religion or belief.

Residents will be signposted to local religious and cultural facilities. Transport to places of worship should be provided as required (e.g., Friday prayers) and the provider will offer a choice of meals which cater to any dietary needs in relation to the religion of service users.

The proposal is not considered to be directly or indirectly discriminating in relation to religion or belief.

#### Disability

Asylum seekers with accommodation-related care needs that are not linked to destitution fall to be assisted by local authorities under separate statutory arrangements - the Care Act 2014 or the Children Act 1989 (or equivalent legislation in Scotland, Wales and Northern Ireland), following an appropriate care assessment by the relevant local authority. Those with lesser disabilities may be eligible to be supported by the Home Office under section 95 of the 1999 Act but are unlikely to be found suitable to be accommodated at the Wethersfield site. The site is not used to accommodate those who have serious mobility problems or physical disability or for those who have complex health needs within the meaning given by the Healthcare Needs and Pregnancy Dispersal Policy at paragraph 4.16.

Should it come to light that an individual is no longer suitable, they will be transferred to other accommodation. This will be relevant to the extent that such vulnerabilities constitute a disability for the purpose of an equalities consideration.

Those accommodated at the site are likely to be aware that it was formerly used as a military barracks. For some asylum seekers this association may trigger memories of past mental trauma in their home countries, which is why the site is unlikely to be deemed suitable for those who are vulnerable or have serious mental health needs.

There is an additional duty under the 2010 Act to make reasonable adjustments for a person who is placed a substantial disadvantage because of their disability when compared to a person who does not share their disability. The site is not considered practical for any individuals who require adjustments. Those individuals will be identified through existing processes - in particular asylum screening and the targeted questions set out in the section 95 application form.

The proposal, as currently assessed, is not considered to be directly or indirectly discriminating in relation to disability.

#### **Sexual Orientation**

All decisions to provide accommodation to an adult asylum seeker are made on a needs basis, regardless of sexual orientation. Consideration of whether an asylum seeker is destitute is based on establishing fact and evidence.

Data on the number of individuals applying for asylum support who identify as gay, lesbian, bisexual, transgender or intersex (LGBTi+) is not collected. Experimental data was collected in 2018 on the number of asylum applicants whose claims were based wholly or in part because they are LGB. This indicated that less than 4% of claims were on that basis.

There is no evidence that individuals with the protected characteristic of sexual orientation require a materially different form of support than others. There may, however, be some circumstances where dormitory style sleeping arrangements are unsuitable for some gay males, for example because they may be subjected to the prejudices of others and potentially subject to harassment. These issues fall to be handled on a case-by-case basis according to existing processes. Where an

individual raises safeguarding concerns because of their sexuality then they can be moved from the site if it is felt that their welfare is compromised.

The proposal is not considered to be directly or indirectly discriminating in relation to sexual orientation.

#### Gender Reassignment

The Home Office does not routinely collect information based on gender reassignment. It is possible that individuals with this protected characteristic may suffer some form of prejudice, in the form of hostile or abusive behaviour, if accommodated alongside large numbers of others who do not share their characteristic. Accommodating these individuals at the site are considered on a case-by-case basis and reviewed in line with the suitability criteria.

The proposal is not considered to be directly or indirectly discriminating in relation to Gender Reassignment.

#### Marriage and Civil Partnership

The status of an individual's marriage and civil partnership is not considered as part of Wethersfield. Wethersfield is only accommodating single adult males. Those married or in civil partnerships who have claimed asylum together are accommodated elsewhere in the asylum accommodation estate.

The proposal is not considered to be directly or indirectly discriminating in relation to marriage and civil partnership.

# Pregnancy and Maternity

The Home Office does not collect or record information on pregnancy and maternity status of individuals in a reportable format. However, based on the number of those applying for maternity grants, in 2021/22 approximately 2,100 people in the asylum support system were pregnant. Females are not being accommodated at Wethersfield. Pregnant asylum seekers and those with babies are accommodated elsewhere in the asylum accommodation estate. Pregnancy and maternity status are not considered as part of this proposal. Wethersfield will only accommodate single adult males.

The proposal is not considered to be directly or indirectly discriminating in relation to pregnancy and maternity.

3b. Consideration of limb 2: Advance equality of opportunity between people who share a protected characteristic and people who do not share it.

Under paragraph 2 of Schedule 18 to the 2010 Act, the requirement under s.149(1)(b) to advance equality of opportunity between those who have a protected characteristic and those who do not, does <u>not</u> have to be considered in relation to immigration and nationality functions in respect of race, religion or belief and age, where race relates to nationality or ethnicity or national origins.

The following protected characteristics have been considered in respect of limb 2:

- disability
- · gender reassignment
- · marriage and civil partnership
- · pregnancy and maternity

- sex
- sexual orientation
- race

The Home Office has considered advancing equality of opportunity between individuals who share a protected characteristic and individuals who do not share it. This proposal does not alter the way destitute asylum seekers who are supported under section 95 or section 98 of the 1999 Act are provided with support.

Consideration of this matter is not therefore strictly necessary, but there is in any event no evidence that accommodating Single Adult Male in need of accommodation at the sites, instead of at a hotel or other facility, will impact on the quality of support they receive or impair their ability to pursue their asylum claims.

3c. Consideration of limb 3: Foster good relations between people who share a protected characteristic and persons who do not share it.

The duty is to have due regard to the need to foster good relations between individuals with different protected characteristics. The 2010 Act specifies that this includes:

- tackling prejudice
- promoting understanding

# Background

The Wethersfield site is situated in an area that has not previously been used to house significant numbers of asylum seekers.

#### Community relations

Residents will be able to leave the premises at any time and current policy will permit an absence from the site for up to 7 days at a time. Service users will be able to interact with local people or pass close to some local amenities nearby, for example recreational centres and schools. We are aware that there is a primary school in close proximity to the site at Wethersfield, this will be discussed as part of local community engagement.

Those who are accommodated at Wethersfield will be provided with meals, facilities to use on site and provision for faith and other activities. Additional facilities will be brought online as the site develops, including a sports facilities and social spaces. The provision of these services and facilities on site will minimise the impact on the local communities.

The proposal results in placing asylum seekers in areas of the country not previously used to accommodate asylum seekers and there may be impacts on community relations that will need to be carefully managed in partnership with the police, local authorities and others. The Home Office will work with the Accommodation Service Provider, Police, Health and other key stakeholders, including the community, in order to establish procedures which will manage associated risks in respect of community relations and to address unease, conflict and a division between the asylum seekers and the community at large.

Considerations will need to be made at the planning stage to recognise if additional onsite provisions such as medical, faith and transport are needed.

The Home Office will engage and consult through scheduled meetings and forums. Once the site is announced, the Home Office will establish a Multi-Agency Forum, bringing together statutory and other agencies on a regular basis, both in the implementation stage and when the site is operational. By working with local police liaison and the local council, the Home Office will address anti-social behaviour where it may occur through the established support from the voluntary sector. The site induction pack will include information on the local environment and ways to avoid anti-social behaviour.

The Home Office intend to offer the Local Authority an incentivisation payment aligned to the published funding instructions for dispersal accommodation. More information provided at <a href="Funding Instruction for Local Authorities">Funding Instruction for Local Authorities</a>: Asylum Dispersal Grant (publishing.service.gov.uk)

# Local services (GPs/Hospitals/emergency services)

In relation to accommodating destitute asylum seekers at Wethersfield, we are considering the impact on the community, including blue light services. The equalities impacts on the community will be re-assessed as the site is scaled up. We recognise the impact on local services will increase as the number of asylum seekers on site increases.

Healthcare consideration will be assessed once the Home Office and NHS England are able to meet with local health partners to finalise on-site health provisions.

The cohort are eligible for free NHS health care in the same way as UK citizens and other permanent residents. Arrangements will be in place to enable those who are resident at the Wethersfield to access those services where they are needed by registering them with a particular GP. However, we must consider onsite medical capability where a nurse practitioner deals with almost all cases presented on a daily basis which would typically be seen in a GP surgery.

The Statement of Requirements for the Asylum Accommodation and Support Contracts is likely to be utilised to define services for users. This will include:

- The Provider shall signpost to Service Users the ways and means for the Service User to provide feedback or make a complaint.
- Provider's responsibility to proactively monitor the residents within their care with specific needs or who may be at risk, and to notify the Authority.
- Ensure all staff have sufficient degree of safeguarding training and clarity on procedures for managing and escalating wellbeing needs for residents.
- The Provider shall comply with statutory requirements safeguarding the health and safety of residents, dependent children, visitors and staff, including RIDDOR.
- Evacuation routes and processes in case of emergency and fire, as to be determined by Provider and approved by Home Office.
- The Provider shall provide a Health and Safety Plan which shall be reviewed at least annually.

Once engagement has commenced, the Equality Impact Assessment will be amended accordingly, reflecting the details of what have been put in place.

## Policing

Policing consideration will be assessed once plans to use the site are announced and engagement commences with the local police force. There will be a number of measures in place designed to minimise impact on the local police force. These measures include, but are not limited to:

- On-site security provision.
- Internal and external patrols to ensure safety and to prevent unauthorised access to contracted location.
- The service provider will manage a booking and sign in process for visitors.
  No overnight visitors.
- If supplier subcontracts security services, the Supplier's Staff shall be on-site and on-duty at all times (24/7/365). The Supplier to determine the exact number needed.
- · Continuously manned reception area.
- The supplier is to carry out security assessment prior to site opening and is responsible for developing security management plan.
- Adhere to the supplier staff conduct as articulated in AASC contracts and all Supplier Staff delivering the security Services shall have SIA licence accreditation and enhanced DBS checks.
- Incident reporting and contacting the authorities when unacceptable behaviour occurs on site.
- Windows, locks, doors and entry controls, CCTV, and accommodation owned or used by the provider in connection with the provision of the services meet appropriate security standards.
- · Terror evacuation plan.

By working with local police liaison and the local council, we will address anti-social behaviour where it may occur through the support we have through the voluntary sector.

#### **Transport**

Transport provision consideration will be completed once we have engaged with local partners.

- Provisions will be made to transport service users to the site when they first move.
- Services will be provided to ensure reasonable access to local town and amenities
- Service provided will ensure service users can attend appointments including medical, legal and maintain religious observances such as Friday prayers at a mosque

# Potential for protests

The site will facilitate visitors, as long as they do not compromise the safe, secure and efficient operation of the sites.

There is potential for protests from 3 key groups:

- · Local residents who object to the usage of the site for accommodation.
- Pro-immigration groups who have concerns about the perceived conditions on the site.
- Anti-immigration groups who object to the housing of asylum seekers or their arrival in the country.



# 4. Summary of foreseeable impacts of policy proposal, guidance or operational activity on people who share protected characteristics

Protected Characteristic Group	Potential for Positive or Negative Impact?	Explanation	Action to address negative impact
Age	Nil	Entire cohort will be single adult males from within the asylum applicant population.	N/A
Disability	Low	Those with disabilities will be assessed for their suitability at the site on a case-by-case basis, however there is limited assessable accommodation available at Wethersfield at present.	Understand the likely need (in terms of % of population) and incorporate into the site construction planning.
Gender Reassignment	Low	Home Office does not routinely collect data on this characteristic, however consideration should be given on a case by case basis of the risk of adverse behaviours from other occupants.	Accommodating people who fall into this characteristic at Wethersfield will be considered on a case by case basis.
Marriage and Civil Partnership	Nil	Single adult males only.	N/A
Pregnancy and Maternity	Nil	Single adult males only.	N/A
Race	Low	Majority of the population (66%) is of 6 non- white ethnic groups, however there is a likelihood of adverse behaviour between them.	Those who are not deemed suitable will be provided with suitable accommodation within the existing estate
Religion or Belief	Medium	Although the majority of the supported population is from primarily Muslim countries it is split between Sunni and Shia Islam which can create adverse behaviours.	Consideration should be given to separate worship areas and the mixing of these populations should be monitored.
Sex	Nil	Entire cohort will be single adult males from within the asylum applicant population.	

Sexual Orientation	on this characteristic; however	Accommodating people who fall into this characteristic at Wethersfield will be considered on a case by case basis.
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#### 5. In light of the overall policy objective, are there any ways to avoid or mitigate any of the negative impacts that you have identified above?

As set out above, there are no noted significant negative impacts or disadvantages for protected groups (within the wider group of single adult males) arising from accommodating them at Wethersfield, as opposed to accommodating them somewhere else. Service provision on the site is not materially different to the provision in other full-board accommodation facilities and hotels.

The use of any dormitory style bedrooms, in addition to certain aspects of the physical layout and history as a former military barracks, make it unsuitable for some asylum seekers, but appropriate ways of identifying these cases have been put in place.

The Home Office will ensure that there is an on-going focus on the wellbeing of individual residents after they arrive at the site and any emerging risks identified – for example through the regular weekly meetings with residents to understand and act on their concerns and close liaison with local health professionals and voluntary sector groups.

The support arrangements on site are similar to the arrangements in other parts of the asylum accommodation estate and residents receive the same level of support to meet their essential living needs as those accommodated in other facilities. As set out above, clear criteria will be put in place to identify those whose personal circumstances mean they are unsuitable to be accommodated at the site.

On commencement of engagement there will be a focus on fostering good relations with the local community, some of which should be on contextualising the issue of the use of the site against the Home Office's wider legal duties to provide accommodation to asylum seekers who require it and the plans to reform the asylum system and reduce the intake of arrivals from France. A focus will be establishing an effective working relationship established with Essex Police and Braintree District Council.

We will explore if there are further mitigations which can be put in place to mitigate demand on local services

6. Review date: quarterly, unless there is a need to review sooner.

#### 7. Declaration

I have read the available evidence and I am satisfied that this demonstrates compliance, where relevant, with Section 149 of the 2010 Act and that due regard has been made to the need to: eliminate unlawful discrimination; advance equality of opportunity; and foster good relations.

SCS sign off: Oliver Banner

Name/Title: Deputy Director, Non-Detained Accommodation Centres

Directorate/Unit: Asylum and Protection

Lead contact:

Date: 23 March 2023