

HOME OFFICE REVIEW OF ASYLUM SUPPORT RATES

Helen Bamber Foundation submission

September 2024

The Helen Bamber Foundation (HBF) is a specialist clinical and human rights charity that works with survivors of trafficking, torture and other forms of extreme human cruelty and believes that all survivors should have safety, freedom and power. Our work alongside survivors shows us that, with early and appropriate care and support, they build the strength to move on with their lives. Our multidisciplinary and clinical team provides a bespoke Model of Integrated Care for survivors which includes medico-legal documentation of physical and psychological injuries; specialist programmes of therapeutic care; a medical advisory service; a counter-trafficking programme; housing and welfare advice; legal protection advice; and community integration activities and services.

Introduction

Many of our clients receive asylum support under sections 95, 98 and 4(2) of the Immigration and Asylum Act 1999. The low asylum support rates negatively affect all aspects of their life in the UK. In our collective clinical experience at HBF, the low rates of financial support provided to our clients can cause them considerable distress and add to their low self-esteem and mental health problems. This can significantly impede their engagement with and progress in therapy. HBF strongly believes that those seeking protection in the UK should receive the same levels of state support as any other individuals in needs, and that support should be sufficient to allow them to live in dignity and uphold their human rights. Asylum support rates must be raised urgently to more realistically reflect the needs of asylum seekers. This submission analyses the Home Office assessment of support rates and provides evidence of HBF clients' needs, as well as setting out our recommendations for change.

HBF and 24 other organisations submitted evidence to the 2023 Home Office review of asylum support rates. We were very pleased to see that the Home Office accepted our recommendations regarding additional and maternity payments – setting additional payments in line with Healthy Start payments; aligning the section 4 maternity payment with the section 95 payments; and widening the window in which a maternity payment can be applied for.

In its latest review, the Home Office acknowledged, and then rejected, a number of other recommendations, including aligning rates with 70% of mainstream benefits. The central argument for this is that “Universal Credit (UC) and other benefit payments are provided for different purposes and are intended to cover a broader range of costs”, yet the review does not state what these are (except utilities and rent – covered below). Regarding the request to include religious, social and cultural participation, and making a one-off payment for clothing, the Home Office has stated that “current provisions are sufficient to ensure individuals are able to meet their living needs” despite the wealth of evidence (to the review and in the public domain) that makes clear this is not the case.

After the 2022 review, that Home Office acknowledged that *“some responses also highlighted that that assessment of the level of the weekly allowance is based on the needs of able-bodied individuals, making no allowances for those with additional mental or physical health needs”* but simply stated that anyone with exceptional needs *“is able to apply for additional funds”*, disregarding our detailed submission outlining the difficulty or impossibility of accessing those funds.

We hope that this review closely considers the evidence made by NGOs, including the evidence in this submission, and re-engages with the recommendations that have been made in previous years and are being made this year. We urge the Home Office to approach this review with the intention of ensuring that people in the asylum system are treated humanely and receive the support they need, and that any current gaps in provision are addressed.

1. The Home Office approach to calculating asylum support rates – key concerns

HBF believes that the Home Office's approach to assessing the levels at which to set asylum support needs to change for a number of reasons:

- The Home Office's stated approach is *"to identify all needs that are considered "essential" for average, able-bodied asylum seekers and their dependants and which are not covered through other arrangements, and then to assess the cost of meeting each of these essential needs".¹* Not only is the assessment of 'essential needs' inadequate (as set out below), that assessment also makes no allowances for those in the asylum system with additional mental or physical health needs who do not reach the threshold required to make them eligible for additional support such as that from a local authority support - under the Care Act 2014. The lack of consideration for those who have additional vulnerabilities is causing considerable difficulties for many of our clients.
- The assessment methodology also includes assumptions about additional funding and support that is simply not available. While certain types of additional support may not always be the responsibility of the Home Office, if the department is not sure that additional funding is available *in practice* (and/or not taking steps to check that it is), then that support should not be included in calculations. Further steps should be taken to ensure that funding is practically available before it is relied on as part of this assessment.
- There is no meaningful consideration of what people who actually live on asylum support experience. A small number of charities, including HBF, can provide very good information about their clients but the actual experiences of men, women and children with direct experience of asylum support, including those who have no access to charity support, is absent from the Home Office's consideration. By comparison, the Department of Work and Pensions relies on data from the Family Resources Survey which is a survey with people living on low income. They also commission research to consider things like material deprivation among households on low income.

In the following section we look at different living needs in turn but our key recommendations are as follows:

- An alternative approach to assessing appropriate levels of support should be taken, with the starting point that it is essential to assess what rate would be necessary for an *acceptable standard of living*. This would include a more realistic assessment of what people seeking asylum actually need to live in safety and with dignity. We recommend the Home Office considers the Joseph Rowntree Foundation's work on the 'Essential

¹ Home Office [Report on the allowances paid to asylum seekers and failed asylum seekers: 2020](#)

Guarantee' which outlines what is needed to ensure everyone has a protected minimum amount of support to afford the essentials.²

- In the interim, the rate of asylum support should be the equivalent of mainstream benefits *minus* a proportion of that figure (up to 30%) to allow for utilities, rent and other costs covered separately by the Home Office. The Home Office has previously rejected aligning asylum support allowances with mainstream social security benefits because the latter “are not set according to the ‘essential living needs’ test and are generally required to cover a broader range of costs, including paying for utilities”.³ No clear explanation has been given as to why those on asylum support have different “living needs” to those on mainstream benefits (indeed, arguably they have greater needs because of arriving with no possessions; extremely long delays in asylum decision making; and their additional vulnerabilities). If asylum support was set at 70% of Universal Credit levels this would recognise that asylum support covers a reduced range of costs - the 30% difference would account for utilities, council tax, rent etc and would align with current practice where the Department of Work and Pension can deduct up to 25% from Universal Credit payments for certain costs (including utilities, Council Tax, rent and service charges).⁴

The table below shows the current Universal Credit rate for single adults over 25, and what that rate would be if the DWP deducted the maximum amount possible (25%) for ‘third party deductions’ (covering Council Tax,⁵ utilities and rent) under its current policy. It also shows what a person seeking asylum would receive if paid 70% of current Universal Credit rates – over £18 a week more than the current rate. It is clear that those seeking asylum are significantly worse off than everyone else in the country reliant on mainstream benefits (which have also been found to be too low):⁶

Circumstances of individual	Universal Credit payment per month	Universal Credit payment per week ⁷	Universal Credit payment per week if max amount deducted for rent, utilities & Council Tax ⁸	Asylum support rate if based on 70% of Universal Credit	Current asylum support
Single and 25 or over	£393.45	£90.80	£68.09	£63.56	£49.18

² Joseph Rowntree Foundation, [Guarantee our Essentials: reforming Universal Credit to ensure we can all afford the essentials in hard times](#), February 2024

³ [Report on review of weekly allowances paid to asylum seekers and failed asylum seekers: 2021](#), April 2022

⁴ [Universal Credit: What you'll get](#) and [Find out about money taken off your Universal Credit payment](#)

⁵ Those on low income also get council tax reductions which those with No Recourse to Public Funds - including those on asylum support are ineligible for.

⁶ Joseph Rowntree Foundation, [Guarantee our Essentials: reforming Universal Credit to ensure we can all afford the essentials in hard times](#), February 2024

⁷ Calculated by taking monthly payment, multiplying by 12 and then dividing by 52 to get weekly payment

⁸ 25% deduction based on existing policy [Find out about money taken off your Universal Credit payment](#)

2. Essential living needs not adequately addressed by asylum support rates

We do not think that the Home Office's assessment adequately addresses the "essential living needs" of individuals in the support system, for the following reasons:

Travel

The Home Office has repeatedly stated that *"we continue to consider that [travel and communication] are not essential needs in themselves, but accept that they may be necessary in limited circumstances to enable other needs to be met, including those related to maintaining interpersonal relationships and a minimum level of participation in social, cultural and religious life."*

Yet for most HBF clients, travel is *vital*, in a range of circumstances, to ensuring they can fulfil their other essential needs, including access to adequate food and healthcare (see below). The limited rate of asylum support makes it extremely difficult for asylum seekers to engage in any other activities, due to prohibitive travel costs. These include accessing college and other educational bodies (our clients are very rarely considered eligible for Discretionary Learner Support Funds and colleges sometimes do not have travel bursaries), social support networks, and religious and/or cultural establishments. We have explored this issue in more detail in our briefing calling for free bus travel in London,⁹ and the barriers to travel resulting from low levels of asylum support have been raised during campaigns calling for free travel in Scotland, Wales and Oxford. Yet, it should not be for local government to have to cover the gaps in support left by central government in this.

The inability to travel for such purposes increases social isolation, prevents people from learning English and integrating within their communities more generally and causes a deterioration in mental health. The inability to travel elsewhere other than the immediate vicinity of their accommodation, combined with the often-poor quality of asylum support accommodation, increases feelings of hopelessness and negatively impacts mental health.

Recently, families with school children placed in a hotel in Westminster were temporarily moved to a hotel in a different borough after a fire in their original hotel. While living in the new hotel, these families had to take their children to school in Westminster and they could not afford the fares.

As mentioned above, the notion that travel costs are not essential in part relies on the assumption that *"asylum seekers are invariably accommodated in urban areas"* which infers they will be close to all the services they need. In line with the Allocation of Accommodation

⁹ Helen Bamber Foundation, [Free bus travel for people seeking asylum in London](#), July 2024

Policy,¹⁰ clients of HBF are required to be housed within zones 1-6 of London, and therefore are ostensibly accommodated in urban areas. However:

- We are aware of the more acute difficulties facing asylum seekers accommodated in less urban areas in other parts of the UK, such as rural parts of Scotland.
- Even within zones 1-6 of London, several of our clients have been placed in areas which are not in the near vicinity of affordable shops or vital services. Many of our clients have complex mental and often physical health conditions, impacting their ability to travel.

In 2024, the Home Office allocated £4.96 a week to travel in its assessment of asylum support rates, designed only to cover one return bus journey a week. No explanation is given as to how it was decided that one return journey a week was sufficient. In Greater London, the region in which our clients reside, the cost of a travelling by bus for up to an hour is £1.75.¹¹ Those with a mental or physical disability are likely to need to take a bus even to travel just a short distance (e.g. to their GP surgery or to a larger shop to buy food) – to do a return journey just once a week costs £3.50 in total, leaving just £1.46 for the rest of the week's travel allowance which is not enough for another single journey.

Many of our clients suffer from symptoms of Post-Traumatic Stress Disorder, as well as other severe mental health conditions including major depressive disorder, anxiety, and psychosis. Many have 'dissociative' symptoms – i.e., have episodes in which they go 'blank' and are transiently aware of their actions and/or their surroundings. They can become lost while travelling, catching the wrong bus or train and then not know where they are. With such a limited amount of financial support, there is little room for these types of errors, which are common for people with severe mental health conditions and a history of traumatic experiences. Many people end up walking to their destination, a journey which can take several hours and cause both mental and physical exhaustion. Many also do not have friends or family who can support them in making these journeys.

The NHS Healthcare Travel Costs Scheme (HTCS) can refund reasonable travel costs if a person has been referred to hospital or other NHS premises for specialist NHS treatment or diagnostic tests. However, this excludes visits to a GP, dentist or other primary care service provider, including antenatal care.

Furthermore, in our experience the HTCS is not well known among asylum seekers who require specialist NHS treatment, and fall within the eligibility of the HTCS, nor is it actually accessible. Many hospitals have no or only a partially staffed cashier's desk, and so asylum seekers who do know about the HTCS are very unlikely to have their travel money reimbursed on the same day. Prompt reimbursement is essential when the weekly rate of support is so low. If the travel costs are claimed retrospectively, the NHS usually does this

¹⁰ Home Office, Allocation of accommodation policy, Version 6.0, 2021

¹¹ [Bus and tram fares - Transport for London \(tfl.gov.uk\)](https://tfl.gov.uk/road-and-rail/transport-for-london/transport-for-london-fares)

via a bank transfer. Given that asylum seekers are largely prohibited from opening a bank account, this makes it difficult / impossible to receive retrospectively reimbursed travel money.

Recommendation: The allocation of money for travel should be increased to a level that would cover at least three return bus journeys a week, wherever the recipient is accommodated.

Recommendation: The assessment used to determine rates for travel should look at what is required to enable people to buy the food they need (see below); access vital services; and maintain interpersonal relationships and a minimum level of participation in social, cultural and religious life – for example, ensuring they are able to travel to attend religious services, see friends and family, and engage in community activities more than once a week.¹²

In its 2020 report, the Home Office report stated that *“the costs of travel for purposes unique to asylum seekers are covered through separate arrangements. Travel to legal appointments is met through legal aid and travel costs to reporting events, asylum interviews and appeal hearings are paid separately”*.

Many asylum seekers in receipt of asylum support do not automatically receive additional payments for travel from the Home Office when they are required to attend reporting centres on a regular basis. Their reporting frequency could be anything from weekly to annually, and, depending on their reporting time, may require travelling at peak time, which is more expensive. In our experience, it can also require third party advocacy to ensure that travel tickets or expenses are provided in advance of reporting events, interviews, and appeal hearings.

For one client, the very meagre financial support was a significant ongoing frustration for him. In an annual review he had spoke about how little he felt he had to live on week-to-week, and how this was also being exacerbated by having to attend Home Office reporting every two weeks and the associated travel costs. These concerns would arise in his therapy also and were a factor in his stabilisation work ending prematurely.

Recommendation: The Home Office should make telephone reporting more widespread.

¹² See *Refugee Action v Secretary of State for the Home Department* [2014] EWHC 1033 (Admin), para 116: “However what is involved in practice in affording asylum seekers an opportunity for a minimum level of participation in social, cultural, and religious life, is a different question. So too is the question what, if any, financial support it requires. What is meant by “minimum”? What activities are covered by “participation”? What costs, if any, are necessary to enable such minimum participation? (...) They are judgments for the Secretary of State. They are ones which she has not yet made, because on her behalf it is contended, in my view erroneously, that this is a category of need which does not require consideration. In this respect the decision making process was flawed”

Recommendation: When a person is provided with asylum support of any kind and made to report in person, they should automatically have funds amounting to a day's bus ticket automatically added to their Aspen card ahead of a reporting event. The same should apply to asylum interviews and appeal hearings.

We are aware that travel to appointments with a person's solicitor can be reimbursed via the Legal Aid Agency, according to the Legal Aid Agency's 2013 Standard Civil Contract Specification. In HBF's experience, though, many solicitors are unaware of this provision, and therefore do not inform clients of this nor apply for this disbursement.

In addition, many of our clients lack knowledge of this disbursement, as well as often the literacy and confidence (as well as other skills affected by their severe mental health conditions, for example adequate concentration amidst dissociative episodes) required to request their solicitor to reimburse their travel expenses, and to continue to request this on a regular basis.

Recommendation: The Home Office should work with the Legal Aid Agency to simplify the process by which recipients of asylum support can have their travel expenses to attend legal appointments reimbursed and ensure that all firms with an immigration Legal Aid contract be informed of this.

Communication

In its latest review, the Home Office concluded that *"the research to determine the 2020 cost remains valid, and therefore, we do not consider any further considerations need to be made regarding the cost of communication needs"*. £4 a week is allocated to communication in self-catered accommodation – nothing is allocated for those in catered accommodation.

Many essential services, such as booking GP appointments and carrying out consultations, or applying for schools and Free School Meals, require being online. Many educational courses also require being able to access email and the internet. Furthermore, communicating with family members from whom individuals may have been separated is an ongoing fundamental need and right for those seeking asylum. In 2024, access to the phone and internet is a key essential need.

Asylum seekers cannot usually access a phone contract without a bank account or credit history, following legislation disallowing asylum seekers from opening bank accounts, therefore pay-as-you go is often the only option.

Restricted access to the internet negatively affects children's progress at school. It also has a considerable effect on adults and contributes to depression and feeling of isolation as they are unable to communicate with relatives left behind, some of whom are living in precarious situations and moving from place to place or living in refugee.

Recommendation: The assessment used for the rates review should look at what support is

required to enable people to maintain interpersonal relationships and a minimum level of participation in social, cultural and religious life – for example, ensuring they have sufficient money to communicate via phone and email. The Joseph Rowntree Foundation has assessed the amount needed for a single adult for communications (including phones, internet and postage) is £9 a week.

Recommendation: Communication should be recognised as an essential need and included in the catered rate.

Recommendation: Accommodation providers should be contractually obliged to provide WiFi in all catered and self-catered accommodation

Food

We believe that the assessed amount to cover food of £32.14 is insufficient to cover the weekly diet needs of adult asylum seekers and any dependent children. For comparison, the Joseph Rowntree Foundation has assessed the amount needed to afford essential food and non-alcoholic drink to be £39 per adult per week.¹³

Many of our clients are likely to have been deprived of adequate nutrition in previous, often precarious living situations (e.g. detention, situations of trafficking, other exploitation and torture) and it is therefore particularly important that they be able to obtain adequate nutrition. However, fresh fruit and vegetables – essential to meet a person’s dietary needs – are unaffordable within this amount while also buying a sufficient number of staple foods.

Furthermore, the Home Office market research used to calculate the costs of meeting certain essential needs assumes that it will be straightforward for those seeking asylum to ‘shop around’ to identify the cheaper outlets and take advantage of cost savings. As outlined above, while living in asylum accommodation, access to shops in which one can bulk buy cost-effectively is not guaranteed. For example, if you live within walking distance of only a small supermarket or off-licence shop, you would need to travel (and therefore spend money on further transport) to bulk-buy, and also be physically and mentally fit enough to carry these purchases home. This is not always possible. The asylum support rates review assumes able-bodiedness and does not adequately consider those who have physical or mental health difficulties. Many clients with chronic physical health issues affecting their mobility experience are limited in their ability to get enough food and nutrition.

¹³ Joseph Rowntree Foundation, [Guarantee our Essentials: reforming Universal Credit to ensure we can all afford the essentials in hard times](#), February 2024

Additionally, potentially cheaper outlets such as markets may require people to pay in cash meaning that those receiving support under section 4 cannot shop at these outlets as they are unable to withdraw cash.

Clients will also face challenges with storing items such as not having a freezer or having limited space given that they live in shared facilities. We also find that often in asylum support accommodation the cooking facilities are inadequate and there is a lack of pots and pans further limiting the effectiveness of bulk-buying and requiring the purchase of further essential items.

The amount allocated for food is particularly insufficient for people who are required to maintain a diet of specific foods for a health condition. Several of our clients are currently required to maintain a specific diet yet are unable to do this within the limitations of asylum support.

Many of our clients, particularly those with children, report not having enough money to buy enough food for their family, and in our experience parents regularly skip meals themselves in order to ensure their children are more adequately fed. If asylum support payments were adequate for covering all 'essential' living needs then people within the asylum system would not report that they were going hungry and would not need to rely on charities to help them meet their basic needs in relation to food or other expenses. Yet, HBF has to provide foodbank vouchers to clients in receipt of asylum support on a weekly basis, as our clients struggle to feed, clothe and generally provide for themselves within this amount.

Even if this reliance on foodbanks was deemed in any way acceptable, it is not an adequate solution to inadequate asylum support provision. The provision of foodbank vouchers relies on asylum seekers' engagement with, and knowledge of, organisations which understand their material circumstances and these organisations' ability to issue foodbank vouchers and food directly. Once a person is referred to a foodbank, they will then need to travel to the location (see above for why this is problematic) and foodbanks try to give out as much non-perishable food as possible, meaning that food provision again excludes vulnerable asylum seekers from maintaining a nutritious diet. Furthermore, many foodbanks operate their own policies regarding how many times an individual/family can access their services. It may be that a person can only visit the foodbank three times in total, or that there is a limit on how many times a person can visit within a particular timeframe. This means that foodbank provision is a short-term fix for a long-term problem, and many of our clients find themselves back at square one but with fewer options available.

See below for more information on our clients' experiences of food in hotel accommodation.

Recommendation – The allocation for food in the asylum support rates should be increased to match the Joseph Rowntree Foundation’s ‘Essential Guarantee’ level of £39 per week. This is all the more vital if the travel rate does not increase given the link between being able to travel and being able to access appropriate food.

Healthcare

As outlined above, the NHS Healthcare Travel Costs Scheme (HTCS) is inadequate for several reasons for the refund of travel to secondary NHS care to people receiving asylum support. In addition, we frequently support clients who are trying to navigate receiving appropriate care and treatment from the NHS and struggle with additional costs, separate to travel; in part this is due to the very low rate of weekly asylum support leaving no room for misunderstanding, error, or delay. The Home Office calculation of asylum support rates currently includes a tiny amount for non-prescription medicines, presumably on the basis that all prescriptions are covered.

In order to receive free prescriptions, dental treatment, sight tests, glasses and contact lenses, travel costs and wigs/fabric supports, you must have a valid HC2 certificate via the NHS’ Low Income Scheme. Whereas other mainstream benefits automatically qualify a person for full help with health costs, asylum support is not listed as such, and thus people seeking asylum must apply for a HC2 certificate in order to prove their low income.¹⁴ Only on receipt of the HC2 are they then able to provide proof – to a hospital, optician, dentist, etc. – that they are entitled to help with health costs.

The system for providing HC2 certificates for people seeking asylum is chaotic; the online form does not allow a person who confirms that they receive financial support from UKVI to continue with the form and advises that they contact UKVI instead. However, in our experience, contacting Migrant Help to request a HC2 certificate rarely yields a prompt response; only once the HC2 is received can a person receive this healthcare for free.

With those delays, people often go for many months without this certificate. In that time, they cannot receive help with prescription costs; if they declare that they are entitled to help with health costs and do not have a valid HC2, they are likely to receive a penalty charge notice from the NHS Business Services Authority. If they use their very limited asylum support to purchase a prescription, they are likely to then be out of pocket for a significant amount of time, or remain so (the former depending on whether they are aware of the possibility to request a refund, and are able to request this for themselves). The full-board catered accommodation rate currently does not cover the cost of even one NHS prescription. In light of these two options, we often experience clients ‘opting’ for a third; going without their prescribed medication until such time as a HC2 arrives. It is unsafe for

¹⁴ <https://www.nhsbsa.nhs.uk/nhs-low-income-scheme>

people to be in this position. Even once the HC2 arrives, it lasts for six months only (and must be applied for again if someone is moved to alternative accommodation), starting the entire process again.

Additionally, and of particular concern for people receiving the full-board rate only, many medications are advised by GPs but not officially prescribed, meaning that they cannot be provided for free, even if accompanied by a HC2 certificate. Changes implemented in 2018 mean that since then *'a GP, nurse or pharmacist will generally not give you a prescription for certain medicines that are available to buy in a pharmacy or supermarket, even if you qualify for free prescriptions.'*¹⁵ The list of conditions is extensive, and were someone to need these on a regular basis (e.g., a sore throat over several weeks, or coughs/colds throughout several months of the winter) would amount to a significant proportion of the person's weekly allowance. The amount allocated for non-prescription medication does not take into account these changes. There is also no obligation for a pharmacy to offer a generic formulation of an over-the-counter medication, leaving patients seeking asylum with very limited income at risk of buying a more expensive equivalent of the medication they need. We recently saw written in a person's NHS record, a patient who lived in a full-board hotel: *'this may increase risk to mental health as can't afford OTC medication'*.

Recommendation: The asylum support allowance should be increased to sufficiently cover health costs, include the wide range of ailments for which medication is not prescribed and therefore must be paid for.

Recommendation: In line with other eligibility criteria for, for example Free School Meals, the receipt of support under Part 6 of the Immigration and Asylum Act 1999 should be an automatic passporting benefit for eligibility for full help with health costs. This would remove the need to continually apply for HC2 certificates, which often leaves long gaps where someone cannot prove their low income for the purposes of help with health costs. Should this not be possible, urgent reform is required to the processing and issuing of HC2 certificates to people seeking asylum, and this process should be automatic.

Household cleaning items and toiletries

The Home Office has outlined that household cleaning items are now provided by the accommodation providers in Houses of Multiple Occupancy (HMOs) and so the support rates only cover toiletries (£0.89) and laundry/toilet paper (£0.47), amounting to £1.36 per week.

In our experience, residents of asylum support accommodation are often not provided with household cleaning tools required to clean their accommodation. Many people therefore

¹⁵ <https://www.nhs.uk/common-health-questions/medicines/why-cant-i-get-prescription-over-counter-medicine/>

are required to purchase items such as brooms and mops, all of which are too expensive to be covered by £1.36 per week.

In several cases, our clients have entered asylum support accommodation for the first time, after a period of prolonged homelessness and destitution, and needed to spend much of the full first week's payment on household cleaning items, due to the lack of cleanliness in the accommodation when they moved in, leaving no money for other needs that week.

Many of our clients are likely to have lived in unclean conditions in previous situations (including situations of trafficking and other exploitation, torture, homelessness). Due to the symptoms of Post-Traumatic Stress Disorder and the impact of traumatic events, they can be particularly susceptible to feelings of shame and inferiority and lack of hygiene can be particularly triggering for them, leading to a deterioration in mental health. It is therefore particularly important, both for their physical and mental health, that they be able to maintain their living space and personal hygiene adequately, requiring sufficient amounts of toiletries and household cleaning items.

Furthermore, due to these symptoms and the impact of traumatic events, our clients are less likely to find and approach organisations which may be able to provide items for free, including toiletries, clothing and footwear, where they do exist.

In particular, menstrual products are often expensive. Many of our clients use sanitary towels instead of tampons. In our experience this is due to various factors including the psychological and physical effects of sexual violence and a lack of familiarity with tampons, as well as the relative costs of both types of product.¹⁶ Many of our clients also report gynaecological conditions causing heavy periods (including fibroids, endometriosis and polycystic ovary syndrome).¹⁷ This also requires more regular changing of menstrual products, therefore incurring a higher cost not reflected in the in-store market research undertaken by the Home Office for the last review of section 95 support rates.

We understand following last year's review that the provision for 'feminine hygiene products' was increased by two packs per year, equating to an increase of £0.04 per week, and thus the weekly rate for toiletries (including these products) was increased from £0.80 to £0.89. However, this is simply not how people must buy these products (as well as many of the other 'essential needs' assessed by the Home Office); the extremely low rate of support, paid weekly, means that such calculations simply do not work in the context of a person's life. A person does not need to buy sanitary pads each and every week. However, at the times when they are menstruating and require these products, they will need to spend significantly more than £0.89 per week, money which they will not have, as other essential needs must still be met. Period poverty is widespread amongst asylum seekers.

¹⁶ <https://www.bloodygoodperiod.com/period-poverty>

¹⁷ See Royal College of Obstetricians and Gynaecologists, [National Heavy Menstrual Bleeding Audit](#)

There appears to have been no new research on the cost and average usage of toilet paper, despite publicly available statistics stating that in 2022, respondents in the UK aged 65 to 74 years spent an average of 80p a week on toilet paper. Those aged between 30 and 49 or 50 and 64 spent on average £1 per week.¹⁸ Those costs can only be greater in 2024.

Recommendation: Given the reported failure of asylum accommodation providers to ensure that adequate household cleaning products are available, the Home Office should include the cost of essential cleaning products in its assessment of asylum support rates.

Recommendation: The rates should also increase the allowance for laundry/toilet paper and toiletries to better cover the people's actual day to day needs.

Clothing

The clothing and footwear needs of a person seeking asylum, for which they are allocated £3.43 a week, are considered by the Home Office to be three pairs of underpants, three pairs of socks/tights, two vests/bras, two tops or shirts, two pairs of trousers or skirts, two cardigans/jumpers, one coat, and two pairs of shoes, nightwear, and a hat, gloves and scarf. We do not believe that the current allowance is sufficient. People often arrive in the UK with very little clothing and lack the resources to locate services, if even available in their local area, which may be able to provide clothing and footwear for free.

Wearing the same set of clothes for prolonged periods, a situation in which many of our clients find themselves, exacerbates clients' feelings of humiliation, shame and indignity, in addition to the symptoms of Post-Traumatic Stress Disorder and the impact of traumatic events. Many of our clients ask for help with this, as they arrive with very few clothes and are unable to afford purchasing more.

The current asylum support rate is also insufficient to purchase seasonally appropriate clothing. Suitable winter clothing is expensive to buy, particularly at short notice when most required, and particularly if asylum seekers have dependent children who are often still growing at fast rates. Usually over the winter, HBF collect donations of winter clothing to distribute among our clients who are seeking asylum, but this is not a sustainable solution – state support should be sufficient to ensure people can clothe themselves.

Recommendation: The allocation of asylum support should be increased to be sufficient for the purchase of suitable clothing all year round, including for dependent children who will continually outgrow their clothes. The Joseph Rowntree Foundation recommends £6 per week per single adult to cover clothing essentials.

¹⁸ <https://www.statista.com/statistics/285857/toilet-paper-weekly-uk-household-expenditure-by-age/>

3. Children's specific needs

The 2020 Home Office review claims that *“any extra costs in some households of meeting particular needs (e.g. clothes for teenagers) are comfortably offset by the availability of economies of scale that mean other costs per person in the household fall. [...] Applying a flat rate... per person in a household therefore means that all families, regardless of their size and composition, will have sufficient to cover their full essential living needs.”*¹⁹ This is reiterated in the 2022 report, which also highlights that children of people seeking asylum will have access to free school meals and free travel to/from school. Whilst Free School Meals are now accessible to those in receipt of both section 95 and section 4, there are frequent issues with applying for Free School Meals from the local authority (which requires literacy in English and digital skills or access to third-party advocacy, and the local authority accepting proof of the person's asylum support reference number and grant of asylum support). In terms of free travel to/from school, this does not reflect the fact that due to the age of the child(ren) and/or distance from the asylum support accommodation to the school, parents need to take their children to school, thus spending more of the available weekly allowance on essential travel, resulting in less money available for food and other essentials.

Many of our clients with dependent children struggle to fully meet their needs with the current rate of support. HBF clients with children often struggle to buy the items that they need, including adequate nutritious food, clothing and educational items.

School uniforms

The latest Home Office review does not engage with the need for children to have school uniform. However, the Home Office report of 2020²⁰ estimated that the school uniform to be purchased within current asylum support rates for a child aged three-12 consists of two trousers/skirts, two polo shirts/blouses/shirts, one school jumper, one pair of shoes, one school bag, and for a child aged 13+, one additional sports top, set of tracksuit bottoms and pair of shorts/skirt. It showed that the cost of clothing for a child or teenager, including school uniform, was £4.15 or £4.70 respectively.

As described above, the amount allocated to clothing is already woefully low. Furthermore, anyone with school-aged children will know that this is a completely unrealistic amount of uniform for a child – it would require almost daily washing which would simply be impossible given the extremely low funding granted for laundry (see above) and ignores the fact that often children will need additional shoes for school. It is also unclear why the Home Office believes that primary school children would not need a PE kit. Even if the primary school does not require a uniformed PE kit, they would still require children to

¹⁹ Home Office [Report on the allowances paid to asylum seekers and failed asylum seekers: 2020](#)

²⁰ Home Office [Report on the allowances paid to asylum seekers and failed asylum seekers: 2020](#)

have suitable clothing for PE, which, as explained above, is not always possible for those seeking asylum. It is also well known that school uniforms can be prohibitively expensive due to the number of (often branded) items required, and these are not always available from the three shops surveyed as part of the assessment.²¹

The 2018 Home Office report claimed that *"in most cases if a child is entitled to free school meals... it is likely that the child will be entitled to apply for [school uniform] grants"*. HBF has repeatedly submitted evidence that these grants are generally inaccessible in London boroughs. Research from 2023 showed that only 20 local authorities in England provide any assistance, however limited, with the costs of school uniforms.²² One local authority in London that still offers such a grant provides only £15 per child, and only twice over the time a child will spend in primary school education.

We are aware that under Section 96(2) of the Immigration and Asylum Act 1999, if the circumstances of a particular case are exceptional, further support may be provided to a person seeking asylum and any dependants *"in such other ways as considered necessary"*.²³ However, the need for new school uniforms (and other clothes and shoes for children) is a continual and annual need, and should therefore be allocated as standard, rather than requiring families to complete the complex section 96(2) application and risk remaining unable to purchase the school uniform (and other vital clothing) for their children. HBF has previously submitted several section 96(2) applications for this additional support, for the explicit purpose of purchasing school uniform and with evidence of exhausting other options, but no response or decision to these applications was ever received.

Educational materials for children

The products suggested by the Home Office are not sufficient for children to properly enjoy and thrive in their education in the 21st century. The latest Home Office rates review includes the costs of *'notepad and pens x 4'*, ignoring the fact that children will usually also need books, a calculator, pencil case, ruler, a rubber, a pencil sharpener, pencils, coloured pencils, and craft materials for school projects. Even if the children's school provides the above items at school, they are often not able to be taken home in order to complete homework to a satisfactory level. It is also not possible for children in different school years to split and share resources to a satisfactory level.

HBF believes that the current rate of £49.18 does not sufficiently reflect the needs of families with children – and it is not always possible for people who are on asylum support to use economies of scale. Families arriving to the UK to seek protection often arrive with

²¹ See The Children's Society, [The Wrong Blazer](#), 2020

²² Money Saving Expert, [School uniform grants – check if you can reduce costs by up to £200 with support from your council](#), August 2023.

²³ Home Office, [Applications for additional support](#), March 2017

nothing but the clothes on their backs and have to, for example, purchase full sets of clothing for each member of their household at once in order to ensure they are dressed appropriately for the weather conditions in the UK. They are exposed to high costs and are unable to shop around for cheaper alternatives. Families often don't have enough money to pay for books and other educational resources for children; due to limited funds they have to prioritise feeding their children over supporting their intellectual and social development.

Recommendation: An additional payment should be provided each year – per child – to families with school age children in order to buy school uniforms and educational materials. This should be prioritised for people who are living in full-board accommodation.

4. Asylum support in full-board accommodation

The £8.86 provided to those housed in full-board accommodation is completely inadequate to meet essential living needs. We understand that these payments were agreed in order to meet needs related to clothes, non-prescription medication and travel. See above regarding the current inadequacy of the Home Office's methodology and the amount provided to meet these needs for people who are in dispersal and full-board initial accommodation in terms of clothing, travel and medication

In addition, food is a well-evidenced, problem in hotels. The majority of our clients housed in hotels report finding the food very problematic. People housed in a full-board hotel cannot cook in the facilities that exist, and so are wholly dependent on the food provided there. Many people describe the food as low quality, unhealthy, inadequate in portion size, repetitive and frequently inedible. In some instances, it is too spicy, which is particularly difficult for those suffering from serious illness and children.

The food is provided in plastic or Styrofoam containers, usually served in a communal canteen or to be eaten in a person's room, depending on the hotel. There is very little choice, and reportedly little variation between the meals themselves, and due to the very limited subsistence support provided, people have no autonomy to buy any other food for themselves. Clients have reported using their very low subsistence allowance to buy basic staples, such as bread and eggs, in order to not have to eat as much of the food provided at the hotel. Families with children in particular often spend much of their very meagre allowance on food from outside of the hotel, so that their children will actually eat anything at all if/when they will not eat the hotel food. This means they will have less/no money to spend on other essentials, such as toiletries.

The food appears to be rarely freshly cooked and is warmed up by hotel staff in a microwave. Clients have reported to us that they have received cooked meals from their friends but have not been permitted to heat this food in the hotel microwave.

In one case, sympathetic church members cooked meals for an HBF client, as they were aware that she was struggling to eat the food at the hotel and already at a very low weight. She too was not permitted to heat up this food. 14 months later, she has continued to lose a significant amount of weight and is now also being tested for anaemia. She and her GP attribute this to the poor food provided at the hotel, and she cannot supplement her nutritional intake with the meagre asylum support she receives.

There is a lack of fresh fruit and vegetables in the food provided in hotels, and often the meals provided are unhealthy and lack nutrition. HBF frequently sees letters provided by GPs on behalf of their patients, requesting improvements or modifications to the food given to them in the hotel.

HBF has seen reports from local GPs concerned about children losing weight or not growing as expected and recommending healthier diets, and letters from specialist doctors concerned about weight loss and the effect that unhealthy eating is having on their patients suffering from different diseases.

For a client recently diagnosed with iron deficiency anaemia, the GP advised that she will *'need to incorporate iron rich foods in her diet. Please consider this when providing her with food and please try to incorporate foods including – lentils, beans, spinach, dried fruits, red meats etc into her diet'*. Months later, this request has still not been adequately responded to by hotel caterers.

One of our clients diagnosed with a rare form of cancer, and undertaking proton beam radiotherapy whilst at the hotel was diagnosed with *'disease related malnutrition'* and prescribed supplements. Whilst this was partly because of the cancer and its treatment, the oncology dietician noted that as he lives in a hotel he has *'no access to suitable foods to maintain stable weight during treatment. Current dietary intake causing abdominal pain and gastrointestinal issues.'* In a later oncology review, it was noted that he had contracted scabies yet again, and that he remained living in a hotel. Despite legal proceedings and extensive medical evidence, this client was not moved to dispersal accommodation by the Home Office and was also asked to share a room with strangers, despite his significant physical and mental health conditions. He had still not been moved from the hotel at the point that he was finally granted refugee status, and instead remains in the hotel awaiting his eviction notice, as he cannot obtain his own accommodation independently with his current health issues.

Other clients have reported fasting on specific days of the week (for religious reasons), and have asked the hotel staff to save them a meal (which is often issued in plastic containers, and should therefore be easy enough to set aside), for when they break their fast at 4pm. Hotel staff have declined to do this, telling them they must wait until the evening meal time

at 6-7pm, leaving people choosing whether to practise their faith, which is essential to their life (and often a protective factor in terms of their mental health) and going without meals. One client could often not make his appointments with HBF or community activities because they clashed with meal times and the hotel staff refused to give him food any earlier or later. He had to choose between accessing support services and eating.

A recent report on the food provided to people seeking asylum housed in hotel or hostel accommodation in London emphasises the themes our clients raise on a regular basis.²⁴ The research found that people found it very difficult or impossible to meet their and their children's nutritional needs, that inadequate food access had a negative impact on physical health, and that experiences of food in such accommodation were broadly experienced as degrading and dehumanising. People reported universally low-quality food with no consideration for dietary needs, that the structure and timings of meals at hotels were constrictive with no consideration for religious fasting, and that there was no effective or transparent complaints mechanism, with no accountability for the standards of food provided.

In information recently shared with us by the Home Office, the length of time people spend in initial or contingency accommodation before being moved to dispersal accommodation was *'under 200 days'* during quarter two of 2024. We are working with clients who have remained in full-board accommodation for over two years. Regardless, more than six months still represents a significant amount of time for people and their children to be housed in a hotel, many of whom are recently arrived in the UK, and whilst in hotels remain reliant wholly on the food provided and £8.86 per person per week to meet all other basic needs, including travel, non-prescription medication, communication, and food to supplement the often inadequate, unsuitable food provided in full-board settings.

Recommendation: The rate of asylum support paid to people living in full-board hotels should be significantly increased, taking into account the impact (material, psychological, etc.) of living in this type of institutional accommodation for protracted periods of time.

Recommendation: Catered food standards should be increased to meet the standards for school meals, and at least adequate standards of hygiene and nutrition, particularly for people during infancy, childhood, pregnancy, breastfeeding, and people with medical dietary requirements.

Recommendation: No families should be housed in full-board hotels for more than 6 weeks (this is also the timeframe in which - for most homeless families, depending on when they

²⁴ Sustain, [Food experiences of people seeking asylum in London: areas for local action](#), March 2024

arrived in the UK - people can be lawfully housed in B&Bs as temporary accommodation provided by local authorities)

Recommendation: Financial support should be provided to people whilst accommodated under Section 98. At minimum, support under Section 95 – once granted – should be backdated to the date a person was housed under Section 98.

Moving from full-board to non-catered dispersal accommodation

When people are moved from full-board to non-catered dispersal accommodation, often after waiting a very long time to be moved to more settled accommodation, the amount credited to their Aspen card that week is only the full-board amount, even if, for example, they are scheduled to be moved to dispersal accommodation on the Monday of that week. This means that they then have only £8.86 in new, non-catered accommodation, and cannot afford to buy enough food, toiletries and other things that week. In our experience, it is necessary to notify the Home Office via Migrant Help that the person has successfully been moved to dispersal accommodation and will require the increased non-catered allowance from the following Monday. Whilst it is possible to receive an emergency voucher from the accommodation provider, this is inadequate for several reasons; there may not be time to request and receive this from the accommodation provider (particularly as it is not known when requesting this from Migrant Help if the voucher will be authorised by the Home Office, and its distribution then depends on the promptness of the specific accommodation provider and individual housing officer). Additionally, if their Aspen card is then topped up the following week with a backdated payment proportioned for the week before – the week they moved to dispersal accommodation – that person will then have an overpayment, and have their support reduced over a longer period of time, for an entirely unavoidable purpose.

Recommendation: The Home Office should issue an automatic payment – proportioned for the days of the week in which the person will be in dispersal accommodation – for people moved from full-board to non-catered dispersal accommodation. Information on the KPIs for accommodation providers to notify the Home Office of a successfully completed dispersal should be published, and Aspen payments automatically made that same week (outside of the normal Monday schedule) on prompt confirmation of dispersal from the accommodation provider.

5. Other concerns

Emergency costs

Whilst asylum support is meant to address destitution, the low rate means that people are constantly on the brink of not being able to feed themselves or their children, and meet their other basic needs, particularly when unexpected events happen which cannot be

anticipated in advance. For example, clients with £20 uploaded to their Oyster cards, or who have recently purchased a week's bus pass, have then misplaced or had the card/ticket stolen, and then have gone hungry that week; both without the means to travel, and with no money in such a tight budget to afford anything extra. Another example is in periods of extreme weather needing to urgently buy a fan or heater/additional blankets/warm clothes. Affording such items in receipt of the non-catered standard allowance would be difficult enough, but impossible for people receiving only the full-board rate.

Whilst the Home Office ostensibly makes some provision for additional costs this in that people can apply for additional support under Section 96(2) of the Immigration and Asylum Act 1999, it is our position that this is inadequate when a need is urgent. To access support under section 96(2), people need to complete a further application form, requesting details and evidence of how all other sources that could meet this need have been explored and exhausted, and then await a response for issues which are often very time sensitive. The processing times for applications under section 96(2) are not known, nor is the evidential threshold. This option for additional support is therefore an unreliable, if not also inaccessible, option for many people seeking asylum. A recently released response²⁵ to a request for information under the Freedom of Information Act underscores the difficulty in accessing support under section 96(2); very few applications for this support are submitted annually relative to the number of people in receipt of asylum support, and between 6 and 24% of applications were granted, including partially, between the years of 2020-2023.

Recommendation: The rate of asylum support should be increased as outlined above to enable people to better meet their essential needs and have flexibility to deal with emergency needs.

Recommendation: A review should be undertaken specifically with regards to applications for support under Section 96(2). Within this, we would recommend that the Home Office:

- provide more detailed guidance on what is required for a successful application, including case studies
- reduce the evidential burden
- instate a right of appeal with regards to a refusal of such applications
- Automatically grant support under 96(2) on request for specific purposes, such as a person with dependent children who are of school age and therefore have an annual need to buy school uniform.

²⁵ Home Office [response to Freedom of Information request reference FOI2024/05259](#), answered on 22 August 2024

Inconsistency in payment amounts

We have also noticed that sometimes people seeking asylum simply receive the wrong amounts of financial support. When querying this situation with Migrant Help, and where it has been ascertained that the lower payment is not due to a deduction made to recover an 'overpayment', we have been informed via Migrant Help that *'sometimes the wrong amounts just get paid.'*

Recommendation: The Home Office should only be able to issue a set number of standard amounts based on a person's circumstances that are published and for which the calculations are transparent and clear.

Overpayments

The rate of asylum support provided at all stages is inadequate to meet people's basic needs and the overpayment regime worsens this further, deducting even more money (from an already very low sum) designed (as above) to meet a person's absolutely essential living needs.

In our experience, the majority of overpayments recovered by the Home Office are due to official errors, of the Home Office issuing an incorrect payment (e.g. people who required and received an emergency payment due to a lack of functioning Aspen card, and who were then considered to have been 'overpaid' when support was issued to the Aspen card to cover the same period. Recovery of overpayments reduces the already minimal amount for many months, even years.

Recommendation: The Home Office should urgently review the recovery of overpayments of people receiving asylum support. The mechanism for recovery/'clawback' of 'overpayments' from asylum support should be abolished, save for exceptional cases of fraud.

For more information, contact

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