

Wethersfield and access to justice, November 2024

Introduction

Single men seeking asylum have been housed in RAF Wethersfield site since 12 July 2023. The maximum length of stay for those accommodated on site is nine months, “except where the Secretary of State is unable to find suitable onward dispersed accommodation despite reasonable efforts to do so”.¹ In previous reports shared with the Home Office, NGOs working in Wethersfield have highlighted significant growing concerns around the harm being caused to those held there.² One of the concerns raised was the lack of information as to what was happening with the men’s asylum claims and what move-on system was in place. Confusion in part resulted from uncertainties surrounding the implementation of the Illegal Migration Act 2023 and the Rwanda removals scheme. After the laying of a Statutory Instrument ending the retrospective nature of Illegal Migration Act (IMA) provisions in July 2024, the Home Office started decision making on asylum claims made after March 2023, with around 7,000 interviews being undertaken a week. This includes those made by men in Wethersfield.

It remains our view that RAF Wethersfield is fundamentally unsuitable as asylum accommodation and should be closed as a matter of urgency. While it remains open, NGOs are extremely concerned about access to justice in a site widely recognised as remote; situated in a legal advice desert; and lacking in the infrastructure required to facilitate meaningful access to legal advice. Our experience is that there are significant problems onsite, including no information regarding law firms with capacity provided; no financial or logistical support provided for men to travel to legal appointments; insufficient private spaces or access to computer equipment or Wi-Fi to facilitate access to legal advice and no privacy - men are forced to disclose private matters in an environment that they are likely to be overheard. Men are attending interviews having never spoken to a lawyer or received any legal advice.

The following case study from earlier in the year illustrates a number of our concerns which have still not been fully addressed:

Case study

Omar is in his early 20s and from an East African country. He arrived in the UK on a small boat and has been accommodated at Wethersfield since. Omar struggles with poor sleep and his mental health has deteriorated since being accommodated at Wethersfield. He sought the assistance of Doctors of the World (DOTW) and Médecins Sans Frontières who are carrying out health assessments of men accommodated at the site.

¹ See Home Office [factsheet on Wethersfield](#), last updated 16th October 2024

² See Helen Bamber Foundation and Humans for Rights Network, [At what cost? The ongoing harm caused to men seeking asylum held in Wethersfield](#), June 2024 and Doctors of the World and Médecins Sans Frontières, [“Like a prison: No control, no sleep” - Mental Health Crisis at Wethersfield Containment Site Briefing Note](#), May 2024

Omar has struggled to find a solicitor. The list of solicitors that has been circulated at Wethersfield, provided by Migrant Help, is out of date, with key law firms missing. Omar contacted every provider on the list but was either told that they were not taking new clients or that they were unwilling to take on a Wethersfield client. He does not know many people at Wethersfield who have solicitors. He was eventually referred to Asylum Aid by an NGO.

There is very limited functioning Wi-Fi at Wethersfield. Sometimes it will turn on, but the connection is so weak that it barely works. Omar relies on a SIM card that was given to him by a charity in Colchester which pays for 25 GB of data per month. Once that runs out, he uses some of his limited Home Office funds to top it up. When asked whether he could do a Zoom call to provide his lawyer instructions on his case, he responded that he does not think the Wi-Fi will support a Zoom call. He will not be able to afford to top up the data on his phone to accommodate a video conference.

There is no computer room provided at Wethersfield that could be used to attend a video conference. As far as Omar knows, there is no printer that he can use to print documents that his lawyer might send him by email. His lawyer asked the staff at Wethersfield if he could use their scanner but that request was denied.

Sufficiency of legal aid provision

In contrast with formal detention, where detainees should have access to legal advice via the Detained Duty Advice Scheme (notwithstanding its current limitations), it is our understanding that there has been no legal advice surgery made available onsite in Wethersfield. There remains no meaningful access to legal advice and information for the men held there. Wethersfield is located in Essex which has very limited legal aid provision (we are aware of one solicitors firm in Colchester that takes on legal aid cases but they have been at capacity for some time now), as does the nearest neighbouring county of Suffolk.³ As a result, it is consistently hard to find local legal representation.

There is a broader national crisis of provision when it comes to asylum legal aid, which the Home Office is well aware of. 63% of the population in England and Wales do not have access to an immigration and asylum legal aid provider. Even those who do live near one of the remaining providers face significant barriers in accessing legally aided advice, due to saturated provider capacity precipitated by years of unsustainable legal aid fees, heavy administrative burdens and burnt-out practitioners. The provision of immigration and asylum advice in England and Wales is 'not even adequate for first-time adult asylum applications, with a deficit of at least 6,000 for asylum applications and appeals'.⁴

In the face of this crisis in access to justice, providers and the Legal Aid Agency have explored the use of remote advice to bring together providers who have capacity to take on referrals outside of their contract area with clients struggling to find a legal aid provider near them. However, it is

³ Dr Jo Wilding, [No access to justice: How legal advice deserts fail refugees, migrants and our communities](#), May 2022

⁴ *ibid*

essential that face-to-face advice be available – our concerns about reliance on remote advice are outlined in detail in the Appendix to this briefing.

We understand that Refugee Legal Support has started to offer a monthly workshop in Braintree for Wethersfield residents.⁵ Whilst welcome, this is in a different language each month (making it difficult to access regularly) and no substitute for proper legal representation and face-to-face individual advice.

The process for obtaining a legal representative

As mentioned, there is no duty advice scheme in Wethersfield. The ‘Statement of Requirements’ for Wethersfield makes clear that the provider running the site should provide an induction to men moved there that includes “signposting to local services and information to assist the Service User to make contact with local organisations, including...legal advisers and related services”.⁶ The Wethersfield factsheet notes that “asylum seekers are provided with a list of legal representatives and Migrant Help continues to signpost asylum seekers to Immigration Legal Advisors, including one based in Colchester, which is accessible by shuttle bus.”⁷ However, there is no direct assistance provided with referrals or with interpreting to help residents do this. There is no guarantee that the firms on the list will have capacity (as mentioned above, only one firm is local and they are already at capacity), and no consideration of levels of literacy or the challenges faced by people who do not speak English. Often the ability of residents to find lawyers has been due to the unfunded work of charities.

The risk of men not being able to obtain legal advice before their interview, and there being no representative in place to help them address errors or misunderstandings in the interview record, to obtain expert evidence which requires publicly funded disbursements, and the subsequent risk of their asylum claim being refused, is extremely concerning.

We are also concerned about the current First Responder system and the Home Office’s failure to make prompt and accurate referrals of potential victims of trafficking (PVOT) to the National Referral Mechanism (NRM). Other organisations acting as First Responders in the area have been overwhelmed and had to close their waiting list to new referrals, such as the Salvation Army. There has been a widespread lack of understanding about the NRM and the local authority and medical centre have said they would not directly ask people about trafficking indicators or screen for trafficking and would only discuss it if an individual volunteers the information.

Lawyers have worked with clients experiencing significant delays in being referred to the NRM which has significant consequences, especially given that recognition of their status as a PVOT is needed to access support or to transfer to alternative accommodation. In this context it is all the more vital that men in Wethersfield can access legal advice.

⁵ <https://refugeelegalsupport.org/news/how-were-supporting-people-who-have-recently-arrived-in-the-uk/>

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https://www.whatdotheyknow.com/request/asylum_centre_contract/response/2445088/attach/7/ANNEX%20A%20Wethersfield%20Accommodation%20Specification.pdf?cookie_passthrough=1

⁷ See Home Office [factsheet on Wethersfield](#), last updated 16th October 2024

Facilities and privacy

The Statement of Requirements makes clear that part of the support that should be available for men in Wethersfield includes “enabling reasonable visits to site from legal representatives.” And that there should be a “visitor centre, including provision of a controlled, pre-booked access e.g. for legal representatives”. There should also be:

- a. *Wi-Fi access in all common/communal areas as a minimum, available 24/7*
- b. *equipment and connectivity in all private meeting spaces that can be used for remote video calls (e.g. laptop/tablet)*
- c. *bank of internet enabled smart phones will be available 24/7 for temporary use, via a booking system, for those that don't already own one*
- d. *where suitable space is available, provide access to internet enabled computers/tablets for SU personal use*
- e. *access to printers and scanners to support official and legal interactions*
- f. *the service provider will provide support for all relevant IT / Tech needs, e.g. printing and scanning documents, accessing the internet, setting up an email address, working the phones*
- g. *access controls to ensure appropriate internet usage and block access to inappropriate materials.*⁸

The factsheet states that “legal representatives are permitted to visit the site for meetings with asylum seekers, including out-of-hours visits where required. Private meeting spaces and relevant equipment are provided.”⁹

However, there is little provision for private phone calls and no privacy in dormitory style accommodation where conversations could be overheard by other residents or guards. Nor is there sufficient security. We have been informed that the accommodation in the portacabins does not lock from the outside and residents are not provided with a key to their rooms (up to six people per room). They are provided with bedside lockers in their room but say many do not lock and no one will fix the lock when they ask. Many people have had items stolen as there is often no place to store personal belongings securely which would include documents. Bullying and abuse between the men on the site – including racial abuse – has been well documented and for the men experiencing the abuse, it may be even more difficult to find a space in which they feel safe disclosing their experiences. Is it worth remembering the sorts of topics lawyers have to take instructions on, including torture, trafficking, exploitation, physical abuse and sexual abuse. In these conditions, there is a significant risk of individual needs or requirements, such as mental health or capacity issues, being missed. One resident shared that there are some private rooms with a closing door that someone can use 'for a few minutes', but these were only introduced

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https://www.whatdotheyknow.com/request/asylum_centre_contract/response/2445088/attach/7/ANNEX%20A%20Wethersfield%20Accommodation%20Specification.pdf?cookie_passthrough=1

⁹ See Home Office [factsheet on Wethersfield](#), last updated 16th October 2024

recently after months of advocacy. It is unclear whether they have access to Wi-Fi and many men are unaware of the existence of private meeting rooms.

Access to phones is also a significant problem. Often residents do not have phones and without them they are unable to contact a solicitor. Support organisations provide phones as regularly as they can but there are often men who they are unable to assist and this has a knock on negative impact on their access to justice. Care 4 Calais, for example, has a long list of people that have requested phones who they are trying to help. NGOs have had to assist a number of men with setting up email addresses and setting up phones.

Phone credit is also not provided and Wi-Fi is intermittent. If calls are taking place that require credit or data, these will have to be conducted when connected to Wi-Fi resulting in conversations being potentially overheard. Our understanding is there is only Wi-Fi in a couple of places in the camp - next to the office and near/next to the gym area.

Migrant Help have only recently been allowed on-site and only very recently started to distribute SIM cards by operating a list system. The men are reliant on the SIM cards with data but lately they have been reporting issues with accessing signal/internet while in the camp even with these SIM cards. Care 4 Calais has distributed over 350 Vodafone SIM cards since 18th September so it is unclear if this due to the volume of people trying to use the same network in the same area or if it is because the Vodafone network is weak in the camp. Before this there was a period of around three months when no organisations were able to distribute any SIM cards due to high demand, lack of available SIM cards or no location large enough to distribute them for the amount of people that needed them (the site refused to allow organisations onsite to distribute SIM cards).

The limited data (40GB with Vodafone or 25GB a month with O2) is not sufficient and runs out quickly and so the men have to wait for the next month for it to renew. Additionally, once a SIM expires they have to get a new SIM card and therefore a new phone number. Many of the men report concerns about this as by this time they have usually registered their original phone number with the Home Office, medical services, family, friends and, if they do have one, their legal representative.

Care 4 Calais has also had to provide additional or emergency SIM cards for men that have received their Substantive Interview date but do not have any data so that they can access the internet to navigate their way to the interview using train apps and GoogleMaps, translation tools and can message or call if they need any assistance and can access resources like the Right to Remain videos to help them prepare for the interview.

NGOs often have to assist with arranging appointments and contacting clients to ensure the communication exists between client and representative which is unsustainable.

When Asylum Aid's lawyers visited a client in Wethersfield, they were taken to rooms that did not have sufficient heating or access to drinking water. One of the rooms given to them to use included a large open room in the middle of the building, which had no doors and was therefore not private. They had to conduct their meetings wearing winter coats. There was no Wi-Fi available. The

phone signal was poor, and using mobile hotspots to access internet on their laptops was patchy and frustratingly slow. One client required an interpreter, and they had to repeat most questions and ask for the interpreter to repeat most answers due to not being able to hear each other clearly on the line. Due to the poor signal, they were unable to access their Remote Desktop System, and therefore had to work on their desktops, with a risk of work not auto-saving, and unable to access any documents saved on their clients' files.

Residents have confirmed that there is still no access to a private computer or scanner.

Quality control

At present, there is no due diligence being carried out when identifying firms to signpost to in terms of capacity or quality. As was highlighted with Napier Barracks, this risks leading to referrals to firms who take on hundreds of cases and churn through them, barely taking instructions. Support organisations regularly met men in Napier who may have had a legal representative but did not know the name of the firm, had not been provided with information as to how to contact their legal representative or were only in contact with the interpreter (with all communication via the interpreter, not the lawyer). There were also a number of situations where asylum seekers in the camp believed they had a solicitor, which is in fact a volunteer/staff member from an NGO (communicating via Whatsapp) trying to find them a lawyer.

Attending substantive asylum interviews

All men in Wethersfield currently have to travel to London (Croydon or Liverpool Street) for their interviews. This requires them to travel early in the morning on a camp bus to the train station, a travel voucher is provided but no information on the journey is provided. People have traveled to London to find the interview has been cancelled or wrong/no interpreter provided. People have missed interviews because they have struggled to navigate the journey, and at least one person has told us there was an issue with camp transport in the morning so they missed their interview. In one case, the interview started at around 1pm but did not finish until 10pm, meaning that the interviewee also missed mealtimes for lunch or dinner in the camp.

NGOs have seen incorrect languages listed on the Invitation letter as well as an interpreter with the wrong language provided on the day; ticket codes provided for tickets to be collected from the wrong stations not even on the route; and invitations to interviews in entirely different locations that would take hours to get to as well as people not being provided with a ticket at all where the NGO has ended up covering the cost of purchasing the tickets.

In terms of the actual interview, some people have reported issues with errors in the interview transcript where things they have said have not been translated correctly and many of them have no lawyer to help them correct this. Also, in some cases men are requested to send the Home Office translated documents/ evidence after their interviews and they often do not have a legal representative that can help them with this and cannot afford to pay for this themselves.

There has also been an issue with people not receiving their interview letters in time which was suggested to be down to the time it was taking to receive post once it had arrived to the camp.

For example, one man received the letter after the interview date had passed, resulting in him missing his interview and causing him a great deal of stress and anxiety.

Recommendations

There is clearly a significant problem with access to good quality legal advice in Wethersfield. There is both a need to react to this urgently in the short term whilst also thinking about how to address the broader systemic problems that prevent people seeking protection from accessing justice. In 2022, a 'working group' including representative from the Home Office, Asylum Aid, Helen Bamber Foundation, Jesuit Refugee Service, Humans for Rights Network and the Immigration Law Practitioners' Association began to meet regularly to discuss how to ensure residents of Napier Barracks have access to expert legal advice, and to apply any learning from the situation in Napier to the proposed development of further large-scale institutional accommodation. These discussions with NGOs working on the ground in Wethersfield should be resurrected as a matter of urgency.

The Home Office should:

- Identify where the elements of the Wethersfield contract (detailed above) appear not to be being complied with and requesting that the contractor bring the site into compliance as a matter of urgency.
- Introduce a duty phone line in Wethersfield for use by legal representatives or NGOs (often the Home Office provides email addresses but this is insufficient - for example, if a legal representative has booked an interpreter and is unable to contact their client, an email is unlikely to obtain a quick enough response).
- Introduce a mechanism for documents to be sent between solicitors and clients in a timely and confidential fashion – i.e. confidential access to email/printer/scanning that is not through a staff member's computer.
- Amend Migrant Help's contract so that it is tasked with proactively referring Wethersfield residents to lawyers and seeing legal aid referrals through to the person receiving a client care letter/legal aid file being opened. All relevant Migrant Help staff should be trained in the differences between immigration, trafficking, housing, community care and other public law issues.
- Ensure that there are suitable facilities to host advice sessions both remote and face-to-face, including suitable private spaces with adequate heating, access to drinking water and toilet facilities for visiting legal representatives.
- Ensure that there is functioning Wi-Fi in all areas of the site but in particular in the private spaces with sufficient capacity for multiple residents to video call their legal representatives or alternatively should provide residents with additional data for their mobile phones.
- Ensure that residents are able to travel from the site to the nearest train station to attend appointments with their legal representatives whether through providing dedicated transport for this purpose or additional funds to pay for travel.

- Explore other options for ensuring that people can access face-to-face advice, such as taking residents off-site for face-to-face appointments.
- Where advice is provided remotely, it is essential that:
 - Individuals are able to access spaces where they can confidentially discuss matters with their legal representatives. Even where appointments are pre-arranged, Asylum Aid lawyers have still yet to have a remote appointment with someone in detention/barracks accommodation where they are in allocated space away from others.
 - Individuals are able to contact their legal representatives when they need to and vice versa – this requires access to both phone and internet for email/WhatsApp and a confidential device capable of accessing these communication methods.
 - Individuals are able to confidentially share documents with their legal advisers. Asylum Aid has experienced cases in both detention and Wethersfield where clients have been unable to share documents and are reliant on staff for access to faxes and emails, which raises concerns regarding confidentiality.

The Home Office and Legal Aid Agency should:

- Work together to ensure legal provider/s have capacity to take on Wethersfield residents' cases, with at least one in-person meeting between representative and client being offered.
- Ensure that a form of quality control of the firms providing advice to Wethersfield residents is carried out through the regular requesting of feedback.
- Establish a legal advice rota in Wethersfield, similar to provision in immigration removal centres where there is a weekly surgery for which people can book an appointment. Such work would need to be remunerated at hourly rates and funding for travel. Initial advice sessions should not be limited to 30 minutes. In light of continuously raised issues regarding the quality of advice on the Detained Duty Advice Scheme, the Legal Aid Agency should put in place better mechanisms to monitor and ensure that representatives are providing quality legal advice and standards of service at accommodation centres.
- Explore the provision of onsite quality legal advice from a national organisation able to take on clients when they are subsequently dispersed.
- Ensure that in-person legal advice appointments are available on request and suitable private facilities on-site to facilitate these.
- Ensure adequate remuneration of providers for their costs and time in travelling to accommodation centres and relax the guidance on circumstances in which providers are able to travel to see the client and/or make clear that travel costs (for the client to visit the provider, or the provider to visit the accommodation centre) will be met where the client is in an accommodation centre.
- Make clear the circumstances in which legal aid forms can be completed remotely where remote advice is being provided to clients in accommodation centres.

APPENDIX: The challenges of remote advice for people seeking asylum

Research commissioned by the Paul Hamlyn Foundation¹⁰ looked at the remote working methods being used by immigration advice providers, and found that that “recent technological advances have enabled remote working and a transition away from face-to-face advice” and that this “has brought benefits in terms of expanded reach, with some projects being able to extend their offer to people across a much wider geographical area”. However, crucially the report highlights that:

“In the longer term, remote working methods were shown to be unsuitable for people where their situation and vulnerability meant that lack of in-person support and contact could expose them to even more risk”.

The report identifies client groups for whom remote advice and casework are particularly challenging and this includes those seeking asylum and people with multiple vulnerabilities. Practical barriers to accessing advice safely include access to any private, safe line for communication but even where immediate practical barriers are not present, the report highlights the need to gain the trust of such clients as well as ensuring that safeguarding measures are in place in order to get the information necessary to progress the case. Doing this online “can be extremely challenging for providers and clients alike”.

This echoed the findings in Refugee Action’s report ‘No Access to Justice’¹¹ which reviewed and maps provision and demand for free and low-cost immigration legal advice throughout the whole UK, and concludes “remote advice is only a small part of the solution”. The report found that:

- Providers find it takes longer to advise remotely, meaning they face greater financial losses.
- It is difficult to create the rapport with the client needed to enable them to disclose traumatic information remotely.
- Remote advice is more suitable for follow-up appointments than as the sole form of provision.
- Remote advice also places a burden on support organisations which have to provide a private space, a device, an internet connection or data, sorting and scanning of documents, and the psychological support to access an adviser remotely, which few are resourced to provide.

Further research was conducted by the Public Law Project in 2024 (supported by Asylum Aid and the Helen Bamber Foundation), involving interviews with refugees and asylum seekers about their experiences of receiving remote legal advice.¹² It found that:

¹⁰ [How the remote delivery of immigration advice evolved during Covid The digital and capacity implications of this change](#)

¹¹ Refugee Action, No Access to Justice: How legal advice deserts fail refugees, migrants and our communities, May 2022

¹² <https://www.helenbamber.org/resources/research/remote-immigration-and-asylum-advice-what-we-know-and-what-we-need-know>

- Remote advice was more convenient for some legal aid providers and clients, particularly for short consultations and for clients who had medical conditions which made travelling difficult or who felt remote calls enabled them to speak more anonymously.
- Remote advice was suitable for some types of conversations and some people, but clients need to be able to make an informed decision about whether remote or in-person advice is most appropriate for their circumstances. For this to be a meaningful choice, providers need to be able to offer remote and in-person advice.
- Remote advice was likely to be inappropriate when clients had not met their solicitor at all, when they were experiencing significant mental health issues, when they did not have a private, quiet space, or when it was not their choice.
- Building trust between a client and their legal representative was perceived as easier in-person, but once trust had been established it made any future remote interactions easier. Establishing this trust through emotional support and reassurance was vital in allowing interviewees to feel comfortable enough to share their stories fully. Remote advice therefore worked best when clients already had an established relationship with their legal representative.
- Many of the challenges and barriers generated by remote advice were a result of the wider issues in the collapse of legal aid provider capacity and were often obstacles that cut across all modes of advice delivery. Remote advice is not a safe harbour in an ocean of unmet need, but one intrinsically connected to the wider systemic issues facing the legal aid sector.

In Asylum Aid's experience, while remote advice can work well if a rapport has already been built with the client, it is rarely the most appropriate option for the first meeting. It can be extremely difficult to take a detailed history and instruction remotely – there is a real difficulty in unpicking complex factual information that may be affected by trauma, distress or avoidance and when you are unable to pick up on physical cues.

Examples of other legal processes (apart from the first appointment) and tasks which may be inappropriate to conduct remotely include:

- Completing a mental health screening form
- Assessing re-traumatisation or distress when taking instructions or in other appointments
- Spotting interpreting errors or issues a client might have with an interpreter
- Checking maps
- Taking long witness statements, reading back and checking the client understands and agrees with the account
- Reading back medio-legal assessments including psychiatric assessments
- Taking evidence of sensitive issues e.g. sexual or gender-based violence, sexual orientation, religious conversion

Visual communication methods can also play an important role in advice provision. For example, Asylum Aid lawyers will often get clients to draw maps or write down words for interpreters to read back which is significantly more difficult to do remotely. They might also look up certain towns on

Google images and get clients to look at them to try and prompt their memories, and again this is harder to do remotely.

In this context, we believe that **every effort should be made to ensure that all people seeking asylum are able to access face to face advice, at least for their first contact with a lawyer, if not for the duration of their claim where they are part of a vulnerable group as set out above. Some people seeking asylum may prefer receiving advice remotely – for those who would prefer to see someone face to face they should be able to request this, and practically able to access it.**

The need for external scrutiny

The Law Society has already highlighted that for those who are living in “institutionalised settings”, face to face advice is particularly important. People in these settings are reliant on others to facilitate access to legal representatives. With physical visits prevented and inspections either paused or replaced with shorter, often remote, inspections during Covid-19, there was great concern that the inability to access lawyers “removed an essential element of external scrutiny of conditions in institutions at a time where these have become markedly more adverse.”¹³ The UN Committee against Torture, the Human Rights Committee and regional mechanisms have recommended a number of procedural safeguards for those in detention that could also apply to people in accommodation centres, including stating that “access to a lawyer should include the right to contact and be visited by a lawyer.”¹⁴

Lack of providers

While we appreciate that the Home Office perceives remote advice to be an answer to the shortage of legal aid providers, it is important to note the conclusion in the ‘No Access to Justice’ report that **“remote advice is not a viable solution to the severe shortage of advice in particular regions or sub-regions in England and Wales, because there is no significant surplus capacity to be redeployed remotely to other regions”**. Provision in England, Wales and in Northern Ireland may not even be adequate for first-time adult asylum applications (even allowing for some applicants having the resources to pay privately), let alone other matters for clients who are eligible for legal aid. Remote advice at best offers geographical equality of (impoverished) access, not adequacy of provision.¹⁵

¹³ The Law Society, [Law under lockdown: The impact of COVID-19 measures on access to justice and vulnerable people](#), September 2022

¹⁴ [Torture Prevention Guide.pdf \(ohchr.org\)](#)

¹⁵ Refugee Action, [No Access to Justice: How legal advice deserts fail refugees, migrants and our communities](#), May 2022