

Written Evidence Submitted to the Home Affairs Committee's Inquiry into Asylum Accommodation

About Us

JustRight Scotland (JRS) is a registered charity established by human rights lawyers. We use the law to defend and extend people's rights. We believe in lawyers working with non-lawyers and others towards the shared aims of increasing access to justice and reducing inequality in Scotland. We do this by providing direct legal advice to individuals and organisations, running outreach legal surgeries and helplines, delivering rights, information, training, and legal education, and contributing to research, policy and influencing work.

We run four legal centres, each focused on addressing key areas of concern for marginalised and disadvantaged groups in Scotland. Our Scottish Refugee and Migrant Centre provides free legal advice and representation to asylum seekers, refugees, and migrants in Scotland. Our key focuses are on women, children, and family reunion. The Scottish Refugee and Migrant Centre also hosts two participatory projects, including our Rights Reps Project which works with asylum seekers being housed in hotel (institutionalised) accommodation in Scotland.

Through our varied work the structural inadequacies of the current system of asylum accommodation have been highlighted to us. Our focus will be on the use of asylum hotels, although we acknowledge and stress that inadequacies unfortunately characterise the privatised nature of asylum accommodation, as a whole.

Rights Reps Project

The Rights Reps Project was launched by JRS in 2023 in attempt to address the issues with the dispersal of asylum seekers into institutionalised accommodation outside of traditional dispersal locations in Scotland.

This shift in Home Office policy led to the proliferation and normalisation of hotel accommodation in areas that had not historically accommodated asylum seeking populations. These areas lack the adequate and specialised infrastructure required to receive, support, and cater to the needs of increasingly vulnerable populations leaving asylum seekers at risk of systematic rights violations. The concentration of advocacy organisations, support networks, legal advice, and community groups within the central belt of Scotland has meant that there is inequality embedded within the framework of dispersal. Asylum seekers placed in hotels outside the central belt have faced information inequalities, barriers to accessing services, and social/geographic isolation as a result.

The Rights Reps Project attempts to support asylum seekers placed in institutionalised accommodation outside the central belt in monitoring rights violations occurring in these areas. We provide training on rights, entitlements, and the law to provide asylum seekers with the tools to advocate for themselves in areas where they lack the relevant organisations that traditionally support with this.

Our Response

We submitted our written evidence to the Home Affairs Committee Inquiry into asylum accommodation.

Summary:

Based on the evidence collected by our legal casework, community outreach, and participatory rights projects, we have put together this evidence on the current standard of asylum accommodation provision in Scotland. We have focused on the use of remote hotels in Scotland, highlighting the issues that accompany the institutionalisation of isolated accommodation structures to house increasingly vulnerable populations.

We first present the problems embedded within geographically isolated hotel accommodations in the Scottish context. We highlight the geographic inequality that underpins the concentration of services within the central belt of Scotland (Glasgow, Edinburgh, and surrounding areas), and how accommodation outside of these areas are characterised by barriers to accessing basic services, specialised support, legal assistance, and mental and physical health support. These barriers and corresponding social isolation are compounded by lack of affordable transportation. We also emphasise that these areas have not historically accommodated asylum seekers, leading to a lack of awareness about the needs of this particularly vulnerable population. This has also led to exploitation of fear by the Far-Right throughout the country, leading to hotel accommodations becoming targets of violence. The lack of connection to advocacy organisations, specialised infrastructure, and support has led to an increase in risks of exploitation and rights violations.

We then highlight the standard of provision within hotel accommodation by accommodation providers. Our outreach work has revealed systematic patterns of rights violations, particularly in areas of the right to privacy, safeguarding, and accountability. We have also emphasised issues surrounding lack of communication and clarity regarding the responsibilities of accommodation providers towards residents in hotels.

As a result of our specialisation in age-dispute cases, we have seen a significant increase in age-disputed young people being housed in adult-accommodation. We have detailed the safeguarding risks this poses, along with risks of re-trafficking and exploitation that are imminent with the current structure of asylum accommodation.

Lastly, we present our recommendations. We welcome the commitment made by the UK Government to halt the use of hotel accommodation, and emphasise the need for accessible, safe, community-based accommodation for asylum seekers. We hope the Government will collaborate with relevant stakeholders to ensure this is provided in a way which upholds the dignity and meets the needs of an increasingly vulnerable population.

Geographic Isolation and Institutional Accommodation:

The implementation of new dispersal regulations has resulted in the increased use of institutional accommodation in remote and geographically isolated areas of Scotland. This shift has had significant consequences for asylum seekers, who are now housed in areas with limited infrastructure, specialised services, and community support. Unlike previous arrangements where asylum seekers were accommodated in the central belt with better access to services, the current model has exacerbated vulnerabilities by placing individuals in location where specialised services are unavailable.

Barriers to Accessing Services:

Most asylum support services, including specialised healthcare, trauma counselling, integration assistance, and legal advice, are concentrated in the central belt of Scotland (Glasgow, Edinburgh, and surrounding areas). The placement of asylum seekers in remote hotels significantly impedes their ability to access these services. Specifically:

- Legal advice: There is a stark absence of immigration lawyers outside the central belt of Scotland, with only one legal representative located in Fife and one in Dundee. Without legal support, asylum seekers struggle to navigate their claims, understand the asylum system, and attain knowledge about their rights, leading to prolonged asylum processes and increased risk of procedural injustices. This is further impacted by the legal aid crisis and the creation of legal-aid deserts¹
 - A recent session with hotel residents in Aberdeen revealed that many asylum seekers did not know their lawyers' names, their firms, or have their contact details. They struggled to communicate digitally and appeared to take advice from interpreters instead. In Aberdeen and Aberdeenshire, there are more than 600 asylum seekers; there are no local legal aid immigration lawyers. This lack of access to lawyers and lack of understanding of the asylum system a situation we have seen replicated in outreach work across Scotland. The current hotel arrangements, with shared rooms, a lack of private spaces, and poor internet are inadequate for providing quality access to justice, making it difficult for asylum seekers to maintain the confidentiality necessary for effective meetings with their lawyers.

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¹ https://www.justrightscotland.org.uk/wp-content/uploads/2024/08/Legal-aid-reform-briefing-FINAL.pdf and https://www.heraldscotland.com/news/24822187.beyond-breaking-point-scotlands-legal-aid-crisis/

- Healthcare and Mental Health Support: Many remote localities lack the expertise and resources necessary to support asylum seekers, who often present with complex health and trauma-related conditions. Recognising the embedded geographic inequalities in the Scottish landscape, existing healthcare facilities in these areas area already underfunded, overstretched, and ill-equipped to address the specific needs of asylum-seeking populations. Moreover, there are barriers to accessing healthcare in terms of timely and adapted health information and practical support to get to appointments from hotels. Some of this can be attributed to constraints within the health system itself, but also as a result of lack of preparation and capacity from the accommodation providers.
- Transport Limitations: Due to financial constraints £8.86 in allowance for those in hotels most asylum seekers cannot afford transport to urban areas where services are available. Mears, the housing contractor in Scotland, provides limited and inconsistent shuttle services, with the last transport option in many locations departing as early as 4pm, further restricting access to essential services. Furthermore, our partners in Aberdeen, the Grampian Regional Equality Council (GREC), have highlighted the inefficiency of requiring over 600 asylum seekers in the region to travel more than four hours to the central belt in Scotland for Home Office meetings—an unnecessary hardship. Some of these meetings end up being conducted online from the central belt, raising the question of why they cannot simply be held remotely from Aberdeen. There have been various reports of appointments being cancelled mid-journey, causing further distress, especially for those with disabilities.

Case study 1: In Hotel Y, a resident who had recently undergone surgery was scheduled for an exam at the hospital. Due to severe pain, he was unable to walk and requested that Mears arrange a taxi for him. His request was denied on the grounds that only pregnant women and certain other individuals were eligible for transport assistance. As a result, he missed his medical appointment. Accessing healthcare appointments remains a significant challenge for many asylum seekers. Residents of hotels have reported that when they approach Mears for assistance, they are frequently told that staff are too busy and asked to return later, only to face the same response upon their return. A significant number of residents have struggled to book GP appointments and have received no support from the accommodation provider in navigating the healthcare system.

Social Isolation and Community Exclusion

The positioning of asylum accommodation in geographically isolated areas has also led to severe social isolation for many asylum seekers. This has compounded already existing mental health concerns and led to an epidemic of loneliness amongst many asylum-seekers.

- Lack of Community Spaces: Many of the hotels being used for asylum accommodation do not provide communal areas for the residents to gather outside of the dining hall. This reduces opportunities for social interaction in a comfortable environment.
- Distance from Community Support Groups: Most refugee and asylum seeker support networks, including faith-based organisations such as mosques and churches, operate within town centres and urban communities. Asylum seekers in isolated locations are cut off from these vital support systems, leading to increased mental health concerns, loneliness, and difficulty integrating into Scottish society.
- Lack of Opportunities for Integration: The lack of access to educational facilities, language cafes, community integration initiatives, colleges, and other learning opportunities as a result of geographic isolation leaves asylum seekers with little to occupy their time, resulting in a lack of routine and purpose. This further contributes to feelings of isolation, depression, and loneliness. Without structured activities, asylum seekers become heavily reliant on Mears staff for information.
- Third-Sector Access to Hotels: Due to the lack of support provided by the state, support is often "outsourced" to third sector and community organisations. In areas outside the central belt of Scotland this support is not well established, although many groups and organisations are attempting to meet unmet need as much as possible. Third sector partners that seek to provide educational and social services within the hotels face significant challenges in obtaining approval for entry; they have reported that although they have followed all the security protocols, they have had issues with accessing the hotels. They have highlighted inconsistent and opaque regulations determining who is granted access. Those who attempt to highlight issues within the hotels have reported facing punitive actions, including being barred from entry, further restricting asylum seekers' access to external support and advocacy.

Case Study 2: Hotel X is positioned 2.5 miles away from the town centre. This is an hour walk, or a ten-minute car journey. The hotel is situated at the end of a long dirtpath, along an unlit road with no pavement and no speed limit. The hotel is isolated from any amenities; the closest supermarket is a 40-minute walk away, the closest GP is also 40-minutes away. No public transport reaches the hotels; therefore, residents of the hotel are completely dependent on the contractor's provision of transport services- the shuttle to and from the town centre runs four times a day, with the latest shuttle running at 4pm. The shuttle does not run on Sundays. According to several individuals, an organisation attempted to donate bicycles to individuals in the hotel to support with transport. The contracted accommodation provider refused to accept these donations because "asylum seekers do not know the road rules in Scotland". After pushback, they allowed the donations but refused to store the bikes, leaving them to get stolen or damaged by the elements.

There are no specialised asylum support networks, services, or groups that operate in this town- leaving the residents dependent on services and community initiatives that don't meet their needs. We have been alerted to several instances of the contractor's staff barring community organisations from entering the hotel and providing services to those residing there. We have been alerted to numerous instances of depression, suicidal ideation, anxiety, loneliness, and other serious mental health concerns that are compounded by the conditions in the hotel and lack of support available to individuals unable to exercise autonomy.

There have been several attempts by the Far Right to target asylum seekers at this hotel, further raising concerns over safety.

Risks of Exploitation and Rights Violations

As a result of the geographic isolation of institutional accommodation, the lack of advocacy organisations outside the central belt of Scotland, and the knowledge gap among residents in hotels, there has been a lack of monitoring and oversight in remote asylum accommodations. This has resulted in increased reports of mistreatment and neglect, along with an increase in rights violations of asylum seekers by contracted accommodation providers and service providers. Our outreach work has highlighted stark differences between areas where advocacy organisations are active and those where asylum seekers have little to no external support.

In isolated hotels, we have recorded multiple reports of:

- Threats by Mears staff and hotel staff against residents. Some threats included "telling the Home Office to rescind their asylum claim", threats of deportation, being sent to Rwanda, and forced homelessness.
- Inadequate food provision and substandard living conditions.
- Theft in hotels and lack of processes for addressing this.
- Confiscation of personal items by staff without explanation.
- · Racist abuse by hotel and security staff.
- Delays in addressing medical needs.
- Violation of privacy by hotel staff- walking into individuals' rooms without knocking.
- There have also been multiple reports of targeting and punitive action against those who make formal complaints.

Case Study 3: Room sharing is implemented in this hotel and has led to privacy concerns amongst residents who are unable to take phone calls from their lawyers or doctors in a confidential setting. As stated by one individual, "everyone knows your business". This lack of privacy extends to treatment of residents by staff in the hotel, who have been entering rooms without permission. A testimony by one individual stated:

"The staff member opened my room door in the early hours and threatened me as he said I was smoking in the room; I do not smoke. The staff member is racist and has made threats to kill me and has tried to hit me before, but I did not let him. I tried to hide in my bathroom as I am scared of the staff member. The staff do not give us privacy, they will walk into the room even if we are naked".

The Far-Right and Targeted Violence

In addition, the expansion of dispersal locations outside the central belt of Scotland without active community engagement by contracted accommodation providers has allowed the Far-Right to exploit fear in local populations. Far-Right groups, such as Patriotic Alternative and National Action, have been able to infiltrate local communities and spread misinformation about vulnerable communities being accommodated in hotels- making them a target.² These groups have a history of violence against racialised communities. The placement of asylum seekers in buildings isolated from support structures makes hotels a primary target of Far-Right violence, as we saw during the fascist riots in 2024.

The lack of engagement by the Home Office, as well as by accommodation providers, with local communities prior to the placement of asylum seekers in new localities provides the Far-Right with recruitment opportunities and presents a national security concern- considering many of these groups have been designated as terrorist networks. ³ Many of these localities face historic inequalities, poverty, and lack of equal access to services. The Far-Right have been able to exploit these grievances, as we have seen at the Muthu Hotel in Erskine and now at the Mercure Hotel in Dumfries.⁴

Standard of Service Provision Within Hotels

Communication:

Through our outreach, communication issues between the contracted accommodation provider and hotel residents have consistently been highlighted. Decisions made by hotel and accommodation providers are not being conveyed to residents, leaving them with lack of clarity on changes affecting their daily lives. This lack of transparency creates significant distress and uncertainty. Example: Accommodation providers at a hotel in Scotland banned mugs from being used outside of one specified common area. This decision was taken abruptly and not communicated to any of the residents. This decision was isolated to this specific hotel and no explanation was given.

Additionally, the roles and responsibilities of various staff members within the hotels are not being clearly defined for residents. Many asylum seekers have reported confusion over whether an individual is hotel staff or Mears accommodation staff. This is exacerbated by the fact that residents are often not provided with accessible documents outlining the roles and responsibilities of the various stakeholders involved in their accommodation.

Privacy:

Given the geographical isolation of these hotels from vital services- especially specialised healthcare, mental health support, and legal advice- many essential interventions must take place over the phone. However, in some hotels, Wi-Fi is either not adequately provided or is only available in communal areas such as

² https://theferret.scot/far-right-recruit-erskine-locals-asylum-seekers/

³ https://www.protectuk.police.uk/threat-risk/threat-analysis/threat-extreme-right-wing-terrorism

⁴ https://theferret.scot/far-right-recruit-erskine-locals-asylum-seekers/

lobbies and dining areas, forcing asylum seekers to have sensitive conversations in public, violating their right to privacy, confidentiality and legal privilege. In cases where Wi-Fi is accessible in rooms, asylum seekers are often required to share these rooms with strangers under Mears "Hotel Maximisation" policy. ⁵ This raises serious safeguarding concerns and fundamentally undermines privacy. Additionally, we have received countless reports of staff entering residents' rooms unannounced. This trend has been consistently reported across multiple hotels in Scotland. Such intrusions erode the right to privacy and can be psychologically damaging, particularly for asylum seekers who have experienced unjust imprisonment.

Safeguarding:

The use of hotel accommodation for asylum seekers has created significant safeguarding risks. During the COVID-19 pandemic, asylum seekers were moved from self-contained community housing into hotels, increasing their vulnerability and diminishing their autonomy. The Park Inn incident in 2020 highlighted the serious mental health and welfare risks associated with such placements, yet rather than addressing these issues, Mears and the Home Office have expanded the use of hotel accommodation. The use of these structures to house increasingly traumatised and vulnerable individuals presents a safeguarding risk in and of itself. This safeguarding risk is further emphasised when additional vulnerabilities are present.

Various safeguarding concerns we have been made aware of as a result of our outreach work:

- The isolation of hotels from services and support networks, increasing already existing vulnerabilities and the risk of falling through the cracks.
- The various violations of the right to privacy, which may result in sensitive information being made public.
- The requirement to share rooms as per the Hotel Maximisation policy, which poses serious risks especially to LGBT+ asylum seekers who may face discrimination or be forced to out themselves to staff or other residents.
- The rising number of age-disputed young people placed in hotels without proper access to support or mechanisms to challenge their age assessments.
- Reports of children being housed with unrelated adults, creating child protection risks.
- A lack of gender-sensitive and disability-accessible provisions, with reports of women and disabled individuals being placed in rooms that do not meet their needs.
- Enforced isolation, lack of access to services, and support gaps are creating a mental health illness epidemic in hotels. Increased reports of suicidal ideation, depression, self-harm and other serious illnesses highlight the seriousness of this.

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⁵ https://theferret.scot/safety-concerns-asylum-seekers-share-bedrooms/

Accountability:

The lack of accountability demonstrated by the numerous reports we have received as a result of our advocacy and outreach work highlights a significant concern. The AIRE (Advice, Issue Reporting and Eligibility) contract is siloed from the AASC (Asylum Accommodation and Support Contract), leading to a disjointed and ineffective complaints process. The process is also not accessible to those who are not technologically literate. At the end of the complaints process, Mears is responsible for investigating itself, creating a fundamental conflict of interest. We have reviewed multiple complaints submitted by hotel residents, including 38 complaints from a single hotel regarding the same issues, with no substantive response or resolution. Only when external advocacy organisations intervene do providers reluctantly show willingness to engage. In hotels where no advocacy organisations operate, accountability is likely to be non-existent. This leads us to believe that sections 1.2.7.3-1.2.7.4 of the Statement of Requirements are not being upheld.⁶ Further to this, we have received countless reports of punitive action, targeting, and isolation of asylum seekers who do use the complaints processes.

Case study 4: In Hotel Z, a resident reported a pest infestation to the accommodation providers over the course of several months. Despite raising complaints through multiple channels—including Mears, hotel staff, Migrant Help, his GP, and even an MSP—no meaningful was taken. The ongoing infestation severely impacted both his physical and mental wellbeing, leaving the resident sleeping approximately three hours per night.

One day, this person was abruptly informed that he would be relocated to another city and was given only one-hour notice. He was not given the opportunity to ask questions, process the decision, or say goodbye to friends at the hotel or the church community he was a member of. Now in a new accommodation, he is struggling to integrate without the support networks he once relied on. Prior to his relocation, he had expressed concerns that complaining would lead to him being moved. He feared this tactic would be used to discourage further complaints and perceived the decision as a form of punishment. The asylum seeker's life was severely disrupted by this decision, as a result he was alienated from his friends and could no longer continue seeing his counsellor.

Age-Disputed Young People:

Our Scottish Refugee and Migrant Centre works closely with age-disputed young people who are assessed as adults by the Home Office on arrival. Our recent report details that over the last three years, age disputes raised by the Home Office have increased by 450%; from 853 in 2020 to a staggering 4,698 in 2023. This has resulted in a significantly higher number of age-disputed young people arriving in Scotland. For a number of years, organisations across the UK have been raising concerns about Home Office initial age assessments and their dangerous implications for young people, particularly within the context of recent findings highlighted by the Refugee Council, Helen Bamber Foundation, and Humans for Rights Network emphasising very serious, systematic flaws within the Home Office

⁶ https://data.parliament.uk/DepositedPapers/Files/DEP2018-1112/AASC - Schedule 2 - Statement of Requirements.pdf

initial assessment process. These flaws have contributed to the wrongful assessment of 57% of age-disputed young people, leaving over 1,300 children to be declared as adults between January 2022 and June 2023. The staggering increase in age-disputed young people has intersected with the recent changes in dispersal policies of the Home Office, leaving many of these young people to be accommodated in hotels located in remote areas with limited access to specialised services, advocacy support, and local authority expertise in this area. Our report details the obstacles young people face as a result of this.

Through our casework and outreach, we are seeing a sharp rise in young people being dispersed to adult Home Office accommodation and treated as adults from that point onwards; often in remote hotels sharing a room with another adult. As a result, they receive no specialist support, no access to school and crucially, no one to look after them. Importantly, the Home Office will not refer them to a local authority. This means that young people who are wrongly assessed as adults by the Home Office on entry will only be able to access local authority care and support if they are encountered by a person or an agency, who then refers them to a local authority. Considering the highlighted geographical isolation of many hotels, lack of access to support and advocacy organisations, legal advice deserts, and knowledge gaps amongst service providers in local authorities who have not encountered these kinds of cases, support provision to age-disputed young people outside the central belt is highly limited.

Contracted accommodation providers play a crucial role for age-disputed young people because they are often the first professionals to become aware of the young person after being placed in adult accommodation. This typically occurs during welfare or health checks. However, it is understood that staff are instructed to make referrals to local authorities in very limited circumstances. A referral will only be made in cases where Mears staff have concerns in light of their interactions with the young person. Where staff have concerns, they are required to justify their decision and provide detailed reasons to the Home Office.

Age Disputed Young People and Exploitation:

Through our casework, we have been made aware of a worrying pattern of previously trafficked age-disputed young people being housed in adult accommodation and being re-trafficked within the UK. Child victims of trafficking are especially vulnerable and are often exposed to serious risks of re-trafficking and exploitation. This risk is increased by the lack of suitable accommodation structures, adequate safety measures, and specialised support. Survivors of Human Trafficking in Scotland noted that every age-disputed young person they supported in 2023 was placed in unsuitable accommodation during the full age assessment process. They noted that their young clients were being approached by suspicious individuals at the entrance of their accommodation, raising serious concerns for young people's safety in Home Office accommodation.

Apart from trafficking, the housing of age-disputed young people with adults raises serious safeguarding concerns- particularly within the context of the Hotel Maximisation policies. Not only are children being placed in adult-accommodation

https://www.justrightscotland.org.uk/wp-content/uploads/2024/09/24.09.16-Report-FINAL-APPROVED-_notes-checked.pdf
https://www.justrightscotland.org.uk/wp-content/uploads/2024/09/24.09.16-Report-FINAL-APPROVED-_notes-checked.pdf

structures, in many instances they are sharing rooms with unrelated adults. Although we have been told that age-disputed young people are not to be sharing rooms with adults, the implementation of this has been inconsistent- as we have seen through our casework. This raises risks of exploitation, mental health illness, physical safety, and general threats to wellbeing.

Case Study 5: An age-disputed young person was residing in adult accommodation- a remote hotel located outside Scotland's central belt. The individual had been living there for several months without any specialised intervention from the Home Office or Mears. Third-sector organisations or local authorities were not made aware of the situation. All adults at the hotel were aware that the individual was under 18, and during a session with the residents, they brought the young person's situation to our attention. One community group supporting asylum seekers in the area had been engaging with the individual btu was unfamiliar with the support pathways available for someone in their circumstances. Consequently, they provided only emotional support during their time at the hotel. Once we were informed, we were able to refer the case to the appropriate services. This situation underscores the fact that without specialised services encountering young people in these circumstances, they are not accessing necessary, tailored support.

Conclusions and Recommendations

Based on the evidence gathered as a result of our casework, outreach, and engagement with asylum seekers residing in Home Office accommodation, we welcome the UK Government commitment to the closure of asylum hotels. ⁹ We believe the current system of accommodating asylum seekers in remote institutional accommodation structures, away from specialised services and support, is costly, ineffective, and presents a threat to the human rights of asylum seekers throughout the country. It is putting a strain on already under-funded and stretched public services, while isolating and risking the re-traumatisation of an especially vulnerable population.

We recommend the following: In the short term.

- Urgently reviewing living conditions in hotels, including: food provision, room sharing policies, the lack of community spaces, internet, and thirdparty support in hotels.
- Making material improvements to transportation arrangements, particularly in more isolated and remote hotels.
- Implement urgent changes to staff feedback and complaints processes, in order to foster accessible, inclusive and constructive dialogue with residents.
- Improving communication channels with residents, particularly outlining the responsibilities of accommodation providers within the context of support. This is particularly needed in the areas of healthcare support and education-access support.

 $^9\ https://hansard.parliament.uk/commons/2025-01-13/debates/7EA5295F-52AA-4AF6-AB13-DE4D1B7938F2/AsylumHotels$

Urgently review the cases and placement of age-disputed young people in hotels, working with local authorities to ensure they are receiving the support they need and are not at risk of exploitation and safeguarding risks.

In the mid-term.

- We encourage moving forward with the closure of hotels as fast as reasonably possible.
- We recommend that asylum accommodation is connected with existing safeguarding systems operated by local authorities.
- Necessary reviews to be made to the asylum support rates within the context of increased cost of living, geographic isolation, and specialised needs.
- Increased communication, consultation, and engagement with thirdsector, community organisations, and local authorities in the design and implementation of asylum accommodation which respects the human rights of people seeking safety. We mirror Scottish Refugee Council (SRC)'s call for self-contained community-based accommodation. 10 We believe asylum seekers should be accommodated in safe, accessible housing that meets their needs in localities where people can access legal, medical, specialised, and educational services. We believe this will aid integration, enable support to be accessed, and lead to fewer human rights violations. We echo the call for:
 - Local authorities to have formal oversight and accountability over the private companies running this service, including the ability to control the pace and nature of dispersal in their area.
 - That the UK Home Office provides adequate funding to local authorities and public and charity services so that they can support people to settle into their local communities.
 - That destitution is removed from the UK asylum system and replaced with a new model that allows people to make informed choices about their future.

For further information, please contact JustRight Scotland at: irfa@justrightscotland.org.uk

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¹⁰ https://scottishrefugeecouncil.org.uk/working-for-change/policy-campaigns/asylum-accommodation/