

Wales Strategic Migration Partnership / WSMP
Penally MOD site Lessons Learned – summary of meeting and recommendations.

In September 2020, the Home Office opened up former military barracks at Penally, Pembrokeshire, and the converted army barracks at Napier in Folkstone, as contingency accommodation for asylum seekers. The sites were opened because there was insufficient capacity in the accommodation estate in order to meet the statutory obligation on the Home Office to provide accommodation for destitute asylum seekers. Both sites were/are managed by Clearsprings Ready Homes (CRH). The Penally site closed to asylum seekers in March and was formally handed back to the MOD in May 2021, while Napier continues to be occupied (July 2021).

Much of the feedback from partners at a Penally *Lessons Learned* event chaired by WSMP (May 2021) accords with wider themes articulated in an interim report published by [The Independent Chief Inspector for Borders and Immigration \(ICBI\)](#) and Her Majesty's Inspectorate of Prisons (HMIP) (following inspections of both Penally and Napier site in February and March 2020),¹ and a report by the British Red Cross (BRC), 'Operational learning from Penally Ministry of Defence Base'. The ICBI inspection highlighted substantial logistical and other challenges. Some of the key themes of the ICBI and BRC reports are as follows:

- a. Issues identified with leadership and management of the Penally and Napier sites.
- b. Impacts resulting from the lack of prior consultation about the use of the MOD sites.
- c. Covid concerns raised by Public Health (infrastructure and management plans) and site residents not feeling safe.
- d. Impact on residents of long term stay in Penally and Napier-mental health and safeguarding implications.
- e. Lack of appropriate communications with service users.
- f. Resources, skills, and assurance systems required to support long-term communal accommodation were inadequate at both Penally and Napier.

The recommendations in this report are based on discussions held at the 'lessons learned' meeting regarding the operation of the Penally site. The Home Office have committed to responding to the points raised at the Penally session and feeding these into wider Home Office learning on the operation of contingency sites.

¹ An inspection of the use of contingency asylum accommodation – key findings from site visits to Penally Camp and Napier Barracks - GOV.UK (www.gov.uk)

Note of Penally lessons learned meeting. May 18th, 2021

1. Home Office – Tim Rymer, Deputy Director

- a. The Home Office have learned lessons from the use of MOD sites, which are being applied elsewhere.
- b. It is acknowledged that uncertainty drove a lot of the concerns at Penally, and also that the Home Office should communicate more effectively with service users, providing better information on rationale for move to the site and the time frame for being there. Note that at the Napier site, there is now a greater focus on providing clear information and giving people adequate notice before moving to the site.
- c. In relation to the challenging public order issues, the Home Office quickly established contacts to assist with coordinating arrivals of camp residents which put their safety first and were linked into national colleagues regarding far-right activity at the site.
- d. Ultimately, the fact that there were no COVID cases was down to the preparation and measures put in place by health and other partners.
- e. The voluntary sector 'leaned in' and were incredibly constructive and focussed on service users. Services and management of the camp were improving after some weeks, but it became more challenging when the second COVID wave began.
- f. It is widely acknowledged that the circumstances and pace at which the Penally MOD site was set up was not ideal. The Home Office would have liked to engage more comprehensively and thoroughly with a wide range of partners, but unfortunately the circumstances did not allow this.
- g. The Home Office would like to acknowledge the tremendous help and collective effort from all those involved in setting up the site and ensuring the effective running of it.
- h. Going forward, the Home Office is looking at better engagement with local political leaders, statutory bodies, partners, and service users prior to any future use of contingency accommodation and ensure more robust planning is implemented for the use of potential reception centres in relation to the New Plan for Immigration (*note that in the proposed use of a site at Barton Stacey, there was early engagement by the Home Office with statutory agencies and political leaders. Plans for the site were not taken forward*).

2. Welsh Government – John Davies, Head of Inclusion, Cohesion and Brexit Coordination

- a. The Wales Strategic Migration Partnership' coordination role was vital in facilitating difficult discussions and enabling a constructive multi-agency approach to mobilising and managing the site and supporting service users.

- b. The engagement from Clearsprings Ready Homes (CRH) with local partners was crucial to ensure that services were quickly and effectively put in place.
- c. Two weeks is not enough time to establish contingency accommodation of that nature. It was some time before improvements were made to the site. The risks highlighted by the Independent Chief Inspector for Borders and Immigration (ICBI) following his inspection in early 2021 had implications for public health, service user welfare and integration and community tensions, and undermined Welsh Government's approach to integration.
- d. Commitmentsⁱ were made around quarantine arrangements, but these were not followed though. Data sharing was inadequate (lack of transfer of some service users' prior health assessments).
- e. The Home Office should have considered issues raised by the location and rurality of the site, especially given the recognition that dispersal to rural areas requires a different approach.

3. Clearsprings Ready Homes/CRH– Steve Lakey, Managing Director

- a. CRH appreciate the on-going engagement from all the partners to ensure that CRH were able to run the Penally camp as effectively as possible given the circumstances.
- b. A site such as Penally should have been resourced effectively; the Initial Accommodation and hotel model of service delivery was not a good fit for Penally. In hindsight, CRH should have had a dedicated team to engage with local communities and service providers and should have engaged and communicated better with service users so that service users had a clear understanding why they were there and the anticipated duration of their stay.
- c. Wi-fi should be available/installed from the outset at contingency sites (Wi-fi was installed in February 2021-six months after opening, though there was some patchy provision in communal areas prior to this).

4. Primary Care, Hywel Dda University Health Board – Matt McGivern, Business Manager for General Medical & Provider Services and Rhian Bond (Assistant Director of Primary Care)

- a. There were significant challenges attendant in setting up a service in midst of global pandemic. The LHB set up a service in five days and established a model of good practice, but there were significant impacts on staff wellbeing. If they had not had an LHB-mandated practice (unlike other areas), it may not have been possible; private contractors would have to have been used.
- b. Commitments were made that all service users would have had prior health checks (*note the Home Office state this commitment was not made as health checks are voluntary*) and that the records would be shared, but this did not materialise. Transfer of NHS information was difficult; significant time was spent chasing records from other health boards/clinical commissioning groups.

- c. There was often an ineffective response to safeguarding issues raised. For example, it took four weeks for a person who was identified as a victim of torture to be moved from the site.
- d. The LHB was informed that service users moved to the site would not be the most vulnerable, or those with identified health/complex needs, but this was not the reality; many had experienced trauma, anxiety abuse and neglect. All service users to be moved to similar sites should have a health assessment prior to doing so.
- e. It was discovered (retrospectively) that a person with TB had been on the site and the LHB had no information to steer them through this. In hindsight, the Health Board would have assessed people on arrival.
- f. We did not always feel there was honesty and transparency, although relationships with the Home Office improved over time.
- g. Relationships with partner organisations is fundamental to the success of such an operation: the mobilisation and development of the site was at a pace dictated by the Home Office. It would have been very useful to have had an outline process and directory of key contacts.
- h. CRH team were incredibly helpful and support from Cardiff Health Access Practice and the Swansea Asylum Nurse was critical in assisting the LHB to deliver a service, having had no prior experience of working with asylum seekers.

5. Dyfed Powys Police - Paul Ridley, Chief Inspector, Specialist Operations Planning

- a. There were significant challenges in reorganising elements of the force and responding (e.g., making a threat assessment) in such a short timescale, with little information from the Home Office.
- b. The Police faced significant public order policing challenges not least in managing regular protests and heightened tensions in the community.
- c. Police took a proactive approach and made a decision that if they waited for information from the Home Office, it would have been too late.
- d. Police faced a significant escalation of public order. Responses were proportionate and responsible.
- e. Recording of meetings for administrative purposes should have been permitted.
- f. There was extreme commitment and partnership working, a real momentum between partners and 'no-nonsense' conversations. It was really gratifying to see such effective engagement at all levels at a time of extreme pressure.

6. Public Health reflections: Dr Rachel Andrew, Consultant, Public Health Wales

- a. An aligned response from Public Health Wales (PHW), Pembrokeshire County Council (PCC) and Hywel Dda University Health Board (HDDUHB) ensured

that clear and succinct public health advice and Infection, Prevention and Control (IP&C) advice was provided to the Home Office and Clearsprings Ready Homes.

- b. Close working relationship within the members of the Strategic Migration Partnership' multi-agency group allowed for all partners to understand each other's considerations and priorities.
- c. WSMP facilitating the partnership discussion with HO and CRH was very helpful in escalating partners concerns that we did not have the assurance, that the COVID-19 recommendations provided by PHW, PCC and HDDUHB were in place and being monitored and reviewed.
- d. Lack of advance warning of the arrival of service users meant there was insufficient time to ensure COVID security of site, both in terms of infrastructure and lack of any COVID-19 management plans.
- e. Lack of confidence in CRH/ HO staff to develop, implement and ensure compliance with IP&C measures required to make the site COVID secure.
- f. Lack of assurance that had there been a case of COVID-19 in the camp, that the self-isolation facilities and IP&C measures were robust enough to reduce the risks of onward transmission.
- g. A robust governance process should have been in place to ensure recommended COVID-19 measures were implemented by CRH and reviewed / monitored by HO.
- h. There should have been capital investment at Penally camp to provide fit for purpose self-isolation facilities for a case/ contact of COVID-19 (or another infectious disease).ⁱⁱ

7. Community Cohesion, Pembrokeshire Council - Kay Howells, Community Cohesion Co-ordinator / Sinead Henahan, Community Safety, Poverty and Regeneration Manager.

- a. Note the significant and impressive effort of local community support and pulling together in support of service users at the site, but this needed coordinating and managing. Important lesson is to have a Development Officer function in place at start of the process.
- b. Wi-fi should be installed early on to enable effective service provision.
- c. The ongoing, regular coordination by WSMP was excellent and helped ensure that the operation of the site was not treated as 'business as usual' and kept it as a priority. At the multi-agency discussions, partners challenged each other respectfully.
- d. The Cohesion Cell set up by Pembrokeshire County Council captured key areas of work and formed a strong knowledge of the groups that were protesting. Engagement of Migrant Help in this work was very constructive.
- e. Recommend that the Home Office issue a resource pack/directory of key contacts (including providers) and outline who has responsibility for which area of business.

- f. The Home Office should be confident that local authorities know their communities and listen and respond to concerns raised. The Home Office would benefit from a greater level of understanding of local partnership working at operational and strategic level.
- g. There was a lack of transparency on messaging and the local authority and other key partners were not enabled to give honest answers to questions from the public about the site. The Home Office eventually issued FAQs about Penally which were helpful when they were shared, but until that point, there was an information vacuum. The LA has learned that, rather than waiting for the Home Office to give information, we need to be proactive in managing the messaging as best we can, given that we were struggling between reality and myth, and it was very hard for the truth to be heard. The LA set up a single email address for local concerns, which helped to effectively manage responses and consistent messaging.
- h. There are long term implications of the right-wing activity at the site and PCC engaged with experts on right wing activity: this was a very significant event for the local community and has exposed very strong opinions (akin to Brexit). Note that 'Britain First' now has a Regional Manager for Wales and have a presence in Tenby. Pembrokeshire has the only UKIP councillor in Wales (could be many reasons for this).
- i. More work is needed on understanding the legacy of the Penally site. Some positive legacies have been identified, including increased awareness of diversity (training provided to local Community Council and rolling out of hate crime work in local schools) and a greater recognition of the benefits of the support provided to people at the site by the voluntary and community sector and wider civil society.

8. Communications, Anthony Topazio – Communications Officer, Pembrokeshire Council

- a. Very difficult for the local authority to comment on a decision not made by them. The LA was always on the 'back foot' from the outset in terms of communications, and there were challenges in working with the Home Office press office.
- b. The online public event with the Home Office, Police and Crime Commissioners and local MP helped calm some community tensions.
- c. Profile of right-wing groups was raised, locally.

9. Richard Eynon – Development Manager, [OASIS](#)

- a. Need to work at a slower pace to set up such a site to ensure that appropriate services are in place from the outset.
- b. Covid restrictions meant we were operating with severe constraints: if the site had been treated as one 'bubble' it would have been easier. It was a very difficult site in the winter months and morale was very low, with service users

experiencing long term isolation in accommodation not designed for long term inhabitation.

- c. The collaboration of the voluntary and community sector showed the strengths of those organisations, the professionalism and compassion.
- d. We all need to listen to and be led by the views of services users. The ability to engage face-to-face is vital to establish trust and provide effective support- note that some service users not literate in own language.
- e. Some very positive work by Clearsprings Ready Homes and Migrant Help helped third sector support agencies to engage.

10. Bid Corr, Programme and Partnership Manager – Asylum Rights Programme [Welsh Refugee Council](#)

- a. Voluntary sector can be 'fleet of foot' and can respond quickly, driven by mission and values. WRC had no extra resource, so utilised some underspend to enable a response.
- b. WRC had to manage a tension between relationship with Home Office and CRH and being asked to support service users at the site.
- c. Working at the site took a toll on staff - support from the British Red Cross was vital and much appreciated; WRC had to try to respond to extreme low mood of service users at the site and lack of communication with service users by the Home Office. The Home Office later established weekly engagement with service users which really helped.
- d. Living conditions and food were very poor (though improvements were made as time went on).
- e. Inductions for service users on arrival to Penally and on dispersal were inconsistent and sporadic.
- f. Need more effective coordination and channelling of civil society engagement at such sites.

11. Phil Arnold, Head of Refugee Support, [British Red Cross](#)

- a. The BRC submitted a report into Penally and Napier to the Home Office, which provided details of service users' experiences at Penally and Napier and included a series of recommendations for the Home Office and providers. The BRC provided psycho-social support and information sessions in various community languages at Penally and Napier.
- b. The nature of the camps is unsuitable compared to community-based accommodation. It took a long time to get third sector support on the site, it was a volatile environment in which to operate, and there were issues and risks of vicarious trauma.
- c. Coordination by WSMP was outstanding, as was the willingness of partners to engage.

- d. Exclusion criteria regarding movements to the site should have been co-produced with health professionals: some service users - victims of torture – should not have been placed at the sight.
- e. Highlighted need to encourage service users to engage in health assessments (which are voluntary) and recommend that if using similar sites, Home Office only transfer people who have volunteered to have a health assessment.
- f. BRC are aware of significant issues with mental health and safeguarding across the asylum seeker population, following engagement with circa 400 service users across UK: there should be more emphasis on preventative safeguarding and identification of vulnerability issues of people in the asylum process.
- g. Many service users at both Penally and Napier were very concerned about COVID risks, site cleanliness, sleeping arrangements and food provision; many lacked cash and winter clothing.
- h. Need more work on induction processes, information provision from trusted sources and listening to service users: some people reported not feeling listened to and that they did not receive pre-or post-arrival briefings and if so, these were in English.

12. Migrant Help – Juliette Halstead, Deputy Director of Asylum Services

- a. Supporting service users at Penally was a very different prospect and outside of the Migrant Help Advice, Issue Reporting and Eligibility (AIRE) contract. Migrant Help tried to understand impacts on individuals (including isolation) and gaps in support.
- b. Needs to be more effective communication with service users on the site: it was very difficult for service users not to have a time frame for their stay.
- c. Partnership working helped significantly; the multi-agency approach with partners was very impressive. Third sector and civil society support, coordinated by a Migrant Help, was just beginning to gather pace when the site closed.

13. Faith Communities – Aled Edwards, Chief Executive, CYTUN

- a. Commented on the rise in extremism as a pernicious and dangerous element.
- b. Faith communities did what they could to support service users, the majority of whom were Christians, but the experience was a real challenge.

Closing reflections by Tim Rymer:

- a. Noted point about needing a playbook/directory if similar sites are stood up.
- b. Health-related issues are an area of focus.

- c. Re comms, the Home Office could have done more and this area needs improvement. Noted that if there is a gap in information provision, others may fill that void.
- d. Home Office will consider responses to key points made by partners, when WSMP have provided a note of the meeting.

RECOMMENDATIONS

Coordination and Resourcing

1. Compassion, mission and values are significant driver for third sector and *all* partners to operate despite significant challenges – but partners (local authorities, health, Police) need to be engaged in advance and **adequately resourced** (or recompensed) to mobilise sites / provide emergency responses. Significant costs were incurred by all partners (including Police and Health), and which had to be absorbed within existing budgets. Note that the local authority submitted a bill to the Home Office, of which 42% of the total was reimbursed.
2. Resources to help **coordinate and channel constructive community and civil society engagement** are fundamental to providing a welcoming and supportive environment for migrants in local communities.
3. The central coordination role of the Wales Strategic Migration Partnership was widely acknowledged as vital to the mobilisation and operation of the Penally site, but severely stretched the resources of a small team: **greater investment in this central coordination function** would increase capacity to help mobilise contingency arrangements and effectively support partners, particularly those not previously engaged in delivering services to asylum seekers.
4. The operation of sites such as the MOD sites at Penally and Napier need a **differentiated approach** to mobilisation and planning, **with greater oversight and presence of Home Office** at these sites. The ICBI report stated that managers at both sites lacked the experience and skills to run large-scale communal accommodation (key findings).
5. **Providers need additional capacity** to engage with local services effectively and effectively plan for site opening and avoid negative and far-reaching implications on service users, services and communities².

²Despite issues raised, there is an acknowledgement that Clearsprings and Migrant Help faced severe challenges in having to establish the facility with a very short notice period, and the good work of both teams on the ground was widely recognised by partners.

6. **Capital investment** is required if there are ongoing public health concerns - to provide fit for purpose self-isolation facilities for a case/ contact of COVID-19 (or another infectious disease).

Safeguarding and Public Health

1. Home Office and providers should ensure **robust and transparent governance processes** so COVID-19 and other public health/health and safety measures are implemented where required and reviewed / monitored by Home Office.
2. There needs to be a more **structured and planned approach** to moving service users to contingency accommodation (including health screening and identifying safeguarding risks and vulnerabilities). The Home Office and providers should consider **only moving people who have volunteered to have a health assessment**.
3. **Information sharing** regarding health records is a long-standing problem; work needs to be prioritised need to ensure **proper information sharing processes** are in place between professionals for sharing health and safeguarding information.

Communications

1. Local authorities and public services need **factual information from the Home Office** in advance of opening of contingency accommodation such as Penally and Napier, on the rationale for and operation of the sites, to assist public services in managing messaging and avoid misinformation circulating in the public domain and causing tensions.
2. Home Office and providers should ensure more **effective pre-departure briefings and induction of service users** to contingency sites and ensure **timely and effective communication with service users** about the length of their stay and asylum process.
3. All partners need to hear and be **led by the views and experiences of services users**, establishing mechanisms for face-to-face engagement and providing regular information and updates.

Future use of contingency sites/receptions centres

1. The Home Office should commit to **early and effective engagement** with local political leaders, statutory bodies, all relevant partners, and service users prior to any future use of contingency accommodation, to ensure a greater understanding of and management of impacts at a local level.
2. The Home Office should ensure **sufficient lead in time** to allow robust planning for the use of potential contingency / reception centres, including

- early engagement of key services** including health, third sector and legal advice, to ensure safe and effective support is provided to service users.
3. All partners involved in setting up contingency arrangements need to have an outline process and **directory of key contacts**/'playbook' which details responsibilities and accountabilities, and sufficient time allowed to establish lines of communication/information sharing processes between partners to ensure appropriate safeguarding and promote the best interests and wellbeing of service users.
 4. **Wi-fi should be installed early on to enable effective service provision** especially in midst of public health emergency.
 5. There needs to be more emphasis on **preventative safeguarding and identification of health and vulnerability** issues of people in the asylum process.

For further information, contact anne.hubbard@wlga.gov.uk

ⁱ All asylum seekers moving to Napier and Penally will have security checks on arrival in the United Kingdom, and health screening. In addition, further checks will be conducted prior to arrival on site to ensure that they are suitable for transfer from their previous accommodation. Anyone arriving at this site will have already been in quarantine for 14 days, as per public health guidance.

[Armed Forces: Disciplinary Proceedings: 12 Oct 2020: Hansard Written Answers - TheyWorkForYou](#)

ⁱⁱ The Home Office would not commit to making the necessary investment to ensure COVID security of site, in line with assessment and recommendations put forward by LA and HB including a rejection of proposal to convert accommodation block to isolation facility, or to follow through on their alternative idea of procuring self-contained, free-standing isolation pods as stated it did not offer value for money (Dr Rachael Andrew).