

Camila Graham Wood

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FOI Reference: 65780

8 November 2021

Dear Ms. Wood,

Thank you for your enquiry of 25 August, in which you requested information regarding Aspen Cards. Your request has been handled as a request for information under the Freedom of Information Act 2000. We would like to apologise for the delay in responding.

Information Requested

We make a Freedom of Information request as follows.

A. Monitoring Aspen Card usage

- 1. Please provide your guidance/policy on monitoring the use of Aspen Cards*
- 2. Please provide your guidance/policy on the investigation into the usage of Aspen Cards if there is a safeguarding concern or when there has been a breach of conditions e.g. card not being used for a significant period of time.*
- 3. Please provide your guidance/policy on what constitutes a safeguarding concern.*
- 4. Please provide your guidance/policy in relation to what information is gathered when making a decision to discontinue support.*

B. Impact Assessments

- 5. Please provide a copy of the relevant impact assessments in relation to the collection and storage of information about Aspen Card usage e.g. data protection impact assessment, human rights impact assessment, equality impact assessment.*

C. Agreement

- 6. Please provide a copy of the standard agreement / terms and conditions between the Home office and asylum seeker in relation to the Aspen Card.*

Response

1. Please provide your guidance/policy on monitoring the use of Aspen Cards

The Home Office does not routinely monitor the use of Aspen Cards and will only investigate the usage when there is a safeguarding concern or when there has been a breach of conditions, for example an Aspen Card not being used for a significant period of time.”

The Compliance Team can be alerted to a breach of conditions by a number of internal and external teams who analyse data or who are in contact directly with the asylum supported population. Usually, however, it will be our Accommodation Providers who will advise the Home Office if they believe that a breach of conditions has occurred.

Aspen usage is checked by applying a series of statistical filters to management information provided by the contractor, and interpreting the results, therefore involves manual intervention. Following a referral that a breach may have occurred, a number of actions are taken to establish if a breach has occurred, one of which will be analysis of the Aspen card data of the individual concerned.

2. Please provide your guidance/policy on the investigation into the usage of Aspen Cards if there is a safeguarding concern or when there has been a breach of conditions e.g. card not being used for a significant period of time.

The Home Office does not routinely monitor the use of Aspen Cards, however we will investigate the usage when there is a safeguarding concern or a breach of the conditions of support.

A check of management data or a referral to the Compliance team might identify that a card hasn't been used for a significant period of time; if this coincides with the individual also being noted as a vulnerable individual (such as a Suicide / Self Harm risk), then this might represent a 'safeguarding concern' and additional checks might well be required.

Statistical management data may identify that a card hasn't been used for an extended period. This may lead to a welfare check being carried out on the individual concerned.

Please find attached Section 4 and Section 95 guidance relating to a breach.

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3. Please provide your guidance/policy on what constitutes a safeguarding concern.

Safeguarding considerations would be made on a case by case basis and may be warranted where there are any specific concerns about the wellbeing of any customer, family member, other member of their household e.g. where they are in a House of Multiple Occupancy, or indeed anybody else who they may come in to contact with. Key factors would include anything involving children, anything where a person has previously identified vulnerabilities, anything where the police, health, education or other relevant agencies / organisations have specific current concerns.

Unusual Aspen card activity would generally be defined as (a) evidence that an unusually high balance has accrued (b) there is a prolonged period where no activity has taken place on the card (c) there are regular card transactions recorded outside of the customer's authorised area of residence. Where unusual activity is identified there are three main considerations which would be applied on every case – (1) is there a safeguarding issue which is preventing a person from regularly accessing their support and/or which raises concerns about any person's welfare, (2) is the customer / dependents absent from their authorised accommodation, (3) does the customer / dependents have access to other means of support, which may then cast doubt about the level of asylum support they are currently receiving

4. Please provide your guidance/policy in relation to what information is gathered when making a decision to discontinue support.

Supported asylum seekers are aware of and agree to the Home Office and authorised contractors collecting and storing information about card usage for the purposes of fraud prevention and ensuring compliance with the conditions of use of the Aspen card."

The Aspen data is just one part of the overall picture, and we would always gather additional information in arriving at a decision to discontinue support."

Once the Compliance team are in receipt of a referral to advise there has been breach of conditions, Evidence will be gathered depending on the allegation referred, this also includes engagement with the person on support to ask questions. Assessment of the evidence gathered is carried out to establish if there was a breach of conditions, and also if there was a reasonable excuse for that breach, if one had occurred. This is taken before any action to discontinue support.

5. Please provide a copy of the relevant impact assessments in relation to the collection and storage of information about Aspen Card usage e.g. data protection impact assessment, human rights impact assessment, equality impact assessment.

Any information obtained about Aspen Cards, will be held and stored in accordance with Data Protection legislation.

6. Please provide a copy of the standard agreement / terms and conditions between the Home office and asylum seeker in relation to the Aspen Card.

Please find attached two Annexes detailing the “Covering Letter with T&C’s” and “Aspen Prepaid Card FAQ’s and Term of Conditions”

If you are dissatisfied with this response you may request an independent internal review of our handling of your request by submitting a complaint within two months to foirequests@homeoffice.gov.uk, quoting reference **65780**. If you ask for an internal review, it would be helpful if you could say why you are dissatisfied with the response.

As part of any internal review the Department's handling of your information request will be reassessed by staff not involved in providing you with this response. If you remain dissatisfied after this internal review, you would have a right of complaint to the Information Commissioner as established by section 50 of the Freedom of Information Act.

Yours sincerely

M Egerton
Central Operations

We value your feedback, please use the link below to access a brief anonymous survey to help us improve our service to you:

<http://www.homeofficesurveys.homeoffice.gov.uk/s/108105TAZNG>