

RAS 14

Ymchwiliad i ffoaduriaid a cheiswyr lloches yng Nghymru

Inquiry into refugees and asylum seekers in Wales

Ymateb gan: Glymblaid Ffoaduriaid Cymru

Response from: Welsh Refugee Coalition

Welsh Assembly Committee on Equality, Local Government and Communities

Inquiry on Asylum Seekers and Refugees in Wales

Submission from the Welsh Refugee Coalition¹

1. This submission results from consultation among our membership of over 30 organisations with direct experience of working to welcome and support asylum seekers and refugees in Wales. It is informed by the results of a day's participative meeting attended by 20 member organisations, as well as input from focus groups held in Cardiff, Newport, Swansea and Wrexham. The intention is to highlight the main issues of concern of asylum seekers and refugees in Wales and those working with them. Individual member organisations of the Coalition will submit their own evidence which, in many cases, will offer much more detail on specific areas of concern.

General

2. There is a strong welcome for asylum seekers and refugees in Wales. Many asylum seekers and refugees comment positively on the friendliness of Welsh people towards them and the Welsh Government's policies make a positive difference in the areas where there is devolved competence. It is notable that four Welsh political parties have committed themselves to supporting the aspiration of Wales becoming a 'Nation of Sanctuary'². At the same time as the unfortunate recent rise in hate crime and hostility towards refugees from a minority, there has been a surge in offers of help to our member organisations from the Welsh public. We very much welcome the continued commitment of the Welsh Government to the principle that "refugee inclusion begins on day one of arrival"³ which underpins its policy approach to supporting refugees.

Recommendation 1: The Welsh Government principle of "refugee inclusion begins on day one of arrival" should be reaffirmed and interpreted to apply equally to all those seeking sanctuary, irrespective of the route by which they came to Wales. We urge the Committee to consider carefully the implications of applying this principle in all areas of devolved responsibility even if this puts Wales at odds with UK government policy.

3. There is now experience of refugees and asylum seekers arriving in Wales by a variety of routes. Elements of good practice in welcome, support and integration can be derived from the best experience from all routes. Thus, there are some excellent provisions for support services in different resettlement schemes aimed at specific groups, including the Syrian Vulnerable Persons Relocation Scheme (SVPRS) and the new Unaccompanied Asylum Seeking Children (UASC) arrangements. On the other hand, there is long experience of welcoming and supporting asylum seekers dispersed to Wales after spontaneous arrival in UK and those who go on to obtain leave to remain as refugees through the asylum system.

¹ We are a coalition of over 30 organisations including all the major Welsh refugee NGOs and others working in Wales with asylum seekers and refugees at all stages of their journey, and with the communities in which they live. We work together in the interests of asylum seekers and refugees, to ensure that our limited resources can be used to best effect and to speak with one voice on policies and practices affecting people seeking safety in Wales. See list of members at the end of this document.

² The vision for Wales to develop a culture of hospitality and for its towns, cities and rural areas to become places of welcome for those fleeing persecution. 'City of Sanctuary' is a movement of people across the UK and Ireland who seek to create a culture of hospitality and welcome for people seeking sanctuary. As well as two established 'Cities of Sanctuary' in Swansea and Cardiff, people across Wales have been responding to the refugee crisis in towns and villages across the country, setting up schemes which offer support and welcome.

³ <http://gov.wales/dsjlg/publications/communityregendevelop/refugeeinclusionstrategy/strategye.pdf?lang=en>, page 22

Recommendation 2: Systematic sharing of experience and learning should be set up to link all schemes and services for welcome, support and integration of asylum seekers and refugees. Wherever possible, elements of the good practice delivered via the SVPRS should be replicated and extended to all seeking asylum.

4. Many of the most important policy issues affecting asylum seekers and refugees are outside the areas of devolved competence of the Welsh Government. For example, the Immigration Act 2016 introduces new sanctions on illegal working and changes to financial asylum support, aims to prevent undocumented migrants from accessing housing, driving licences and bank accounts, and introduces additional measures to enforce existing immigration laws. Immigration is a reserved matter, therefore many of its provisions fall within the remit of the Home Office and will be implemented in Wales in the same way as the other administrations of the UK. Certain aspects of the Immigration Act 2016 however impact upon areas of devolved competence. These include:
 - Sections 39-42 on residential tenancies
 - Section 68 and Schedule 12 on availability of local authority support
 - Sections 69-73 on transfer of responsibility for relevant children
5. This Act raises important questions regarding Welsh devolution. As has occurred with other reserved policy matters such as Welfare Reform⁴, it offers the opportunity to analyse, influence and challenge how these provisions of the Immigration Act 2016 are implemented in Wales.

Recommendation 3: The Welsh Government should keep a close watch on UK policy on asylum and immigration and where there are adverse effects either lobby for changes or seek ways within its competence to mitigate these. In particular, the Welsh Government should commit to exploring the impact of the Immigration Act 2016 on individuals, devolved public service and local authorities in Wales, commissioning additional research where necessary and putting in place policies to mitigate any negative impacts.

The effectiveness of the Refugee and Asylum Seekers Delivery Plan

Asylum Accommodation (refer to specialist submission by Tai Pawb for further detail on housing)

6. Asylum accommodation is not devolved (an exception to the devolution of housing policy). Accommodation for asylum seekers in Wales is provided through a Home Office contract with Clearsprings, a large private landlord, through which it also runs the Initial Accommodation hostel in Cardiff. Both the quality of housing and the services provided by Clearsprings are unacceptably poor. There is no independent scrutiny on standards or independent means of complaint. This is a matter of grave concern.

Recommendation 4: The Welsh Government should prioritise finding ways of using its devolved powers to improve asylum accommodation in Wales. For example:

⁴ In response to the UK Government Welfare Reform Act, the Welsh Government set up a Ministerial Task and Finish Group. This group commissioned the Institute of Fiscal Studies to undertake extensive research into the impacts of welfare reforms on individuals and households in Wales, on devolved public service in Wales, on people with protected characteristics and local authority areas in Wales. <http://gov.wales/topics/people-and-communities/welfare-reform-in-wales/analysing-reforms/?lang=en>

- Engage actively with the UK Visa & Immigration Asylum Accommodation and Support Transformation (AAST) stakeholder consultation on new contracts for asylum housing
- Insist that the quality of asylum housing is scrutinised by Welsh Government or local authorities
- Bring the next asylum accommodation contract into Wales, preferably on a non-profit basis, by supporting a bid from one or more Welsh housing associations, other third sector organisations or Local Authorities or negotiating with the Home Office to undertake the contracting process itself.

Housing for New Refugees (refer to specialist submission by Tai Pawb for further detail on housing)

7. Refugees who have come through the asylum route still experience significant difficulties in securing housing. This is exacerbated by the very short “move-on” period of 28 days (see section on move on). The local council's approach is key here. For example, in Swansea, new refugees are often identified as part of a ‘vulnerable group’ and so placed on the priority housing list, but this is not so in other areas.
8. Refugees who are successful with family reunion thereby expand the size of their family unit. Hence they experience renewed housing need some time after their original needs were met.
9. Housing is also one area where the Immigration Act 2016 is likely to have an impact. The Act provides for ‘Right to Rent Checks’, making it compulsory for landlords to check the immigration status of all new adult tenants. We are concerned that these checks will lead to destitution and an increase in homelessness, putting more pressures and costs on already stretched local authorities.

Recommendation 5: The Welsh Government should act to offset discrimination against refugees in housing, both as new refugees and later. For example:

1. Issue guidance to Local Authorities to class all new refugees as vulnerable so that they are regarded as in priority need for housing; alternatively, provide adequate funding to local authorities and accompanying guidance to enable newly recognised refugees who are not considered in priority housing need to benefit from rent deposit scheme.
2. Consider ring-fencing a proportion of the ‘Supporting People’ fund for refugees (this fund helps people maintain tenancies, with a view to preventing homelessness).
3. Ensure Local Authorities in dispersal areas (currently Cardiff, Newport, Swansea and Wrexham) have a dedicated housing resettlement officer; and provide additional training for existing staff.
4. Undertake an Equality Impact Assessment (EIA) of Right to Rent Checks⁵ in Wales and monitor the impact of this legislation.
5. Work with private landlords to raise awareness of different types of migration status to mitigate any impacts of Right to Rent Checks in Wales.
6. Instigate a process for people successful with family reunion so that appropriate temporary housing is made available as soon as family members arrive.

Destitution and Homelessness

10. Coalition members are all aware of increasing numbers of refused asylum seekers who are evicted from asylum accommodation and have no right to public housing, no access to public funds or benefits and no legal right to work. For example, The British Red Cross destitution services, which provide short term crisis support in the form of small amounts of cash, food, and clothing vouchers, in Newport and Cardiff provided financial support to a total of 1027 people in 2015 compared to 634 in 2014. A similar service exists in Swansea, where there is also the SHARE Tawe Voluntary

⁵ <http://www.taipawb.org/policy-influencing/immigration-right-rent-checks/>

Hosting Scheme, which provided 1700 bed-nights of accommodation to 17 destitute asylum seekers in 2015 and a similar amount in only the first nine months of 2016.

11. Such people may be detained and forcibly removed, although more often than not, this does not happen and they are left destitute. The decisions leading to this point are often poor, as evidenced by the fact that, given safe space and time to gather fresh evidence and find a good solicitor who will submit a 'fresh claim' for them, they often succeed in proving their need for protection and are granted 'leave to remain' after all (8 of those accommodated by SHARE Tawe have done this since January 2015). In addition, increasing numbers of newly granted refugees experience temporary destitution due to the inadequacy of the 28-day 'move-on' period, while destitution can also affect some vulnerable migrants including women with insecure immigration status experiencing domestic violence.
12. This desperate situation is the result of a failure of UK asylum and immigration policy to provide a safety net for some of the most vulnerable people in our society. The enforced destitution of vulnerable displaced people has no place in Wales and the prevention of destitution should be prioritised.
13. We welcome the possible inclusion of the organisation of voluntary support for destitute people seeking sanctuary in the Welsh Government's Inclusion Grant. However, there is also a need for direct financial assistance. In 2015, Northern Ireland introduced the OFMDFM (Office of the First Minister and Deputy First Minister) Crisis Fund, which is intended to help minority ethnic individuals with no other means of support through emergency situations. The eligibility criteria include those who currently have no recourse to public funds, such as refused asylum seekers and other vulnerable migrants, as well as destitute refugees. A similar fund in Wales would prevent this form of avoidable destitution.

Recommendation 6: Welsh Government expands the eligibility criteria for the Discretionary Assistance Fund (DAF) to include those who currently have no recourse to public funds (NRPF), such as refused asylum seekers and other vulnerable migrants including destitute refugees. To provide appropriate accountability there would need to be clear guidelines for the types and scale of assistance offered and expected short-term impact on individuals.

Move on

14. In terms of the support available to people, the Welsh Refugee Coalition identifies the SVPRS as the gold standard. People are welcomed at their arrival point, taken to their housing, supported with cash for their first few weeks until benefits start, accompanied to health and education related appointments and supported to find employment. This contrasts to the support available to people who have travelled independently of managed migration routes to seek asylum. Welsh Government currently funds (secure until March 2017) advocacy provision for these people gaining status⁶ whilst living in Wales or choosing to move to Wales following a grant of status.
15. Through this advocacy provision, we know and can evidence that people, immediately after being recognised as in need of international protection, are highly likely to experience financial hardship, homelessness and destitution. People moving through the SVPRS are not as vulnerable to these experiences as they are not faced with a 28 day move on period and administrative procedures that contribute to such problems are addressed earlier. The bespoke support available to Syrian refugees combined with the fast-tracking of administrative support is contributing to a two-tier system of support for people in Wales at a vulnerable point in their lives. We urge the Committee to acknowledge and address this two-tier system by:

⁶ <http://welshrefugeecouncil.org.uk/what-help-do-you-need/i-have-been-granted-status>

Recommendation 7: Asking the Welsh Government to replicate elements of the good practice delivered via SVPRS to all people seeking asylum and also extend the remit of the Taskforce and Operations Board to include **all** asylum seekers and refugees.

Recommendation 8: Seek a commitment from Welsh Government to fund the refugee move on service on a long-term basis.

Recommendation 9: Ensure Jobcentre Plus staff in Wales are required to increase their understanding, possibly through dedicated training, of the particular barriers faced by refugees in job seeking and supported on an ongoing basis to give specialist assistance to them.

Health, Well-being and Social Care

16. Although refugees and asylum-seekers are able to access health services in Wales, there appears to be an issue around the availability of interpreters and the use of Language Line. Language Line should be available as a standard part of healthcare services, and indeed the Welsh Government has provided additional funding to Local Health Boards in dispersal areas to support basic medical costs including health needs assessments, a contribution to primary care and access to Language Line (see Refugee Inclusion Strategy⁷, p.54). Not all health services are offering or using Language Line, with some GPs refusing to make it available – likely due to the additional time required during an appointment – and in some cases, possibly because of direct discrimination. In some cases, parents have had to rely on their children to interpret for them about health conditions. Clearly this is not appropriate and has occurred at GP surgeries and at hospitals. Consultations without an interpreter can lead to misdiagnosis and errors with medication.

Recommendation 10: The Delivery Plan should include action by Welsh Government and health colleagues to ensure all health services in Wales fully integrate Language Line into local health provision. Any guidance needs to make clear that Language Line is not an optional extra. The Welsh Government needs to ensure that Wales level data is collected on the use of Language Line and that this evidence is used to hold the health service to account when needed. There is also a need for retention of in-person interpretation and not an over-reliance on Language Line where particular vulnerabilities are identified and in all complex cases.

17. Mental health support is often not sufficient for people who have experienced significant trauma. Coalition members report that people are waiting six months or more for any counselling, and two years or more for specialist Post Traumatic Stress Disorder (PTSD) counselling. Often this counselling does not include appropriate translation or interpretation. Due regard needs to be paid to the impact of the asylum process on the wellbeing of sanctuary seekers, and that during the asylum claim period, a person's mental health can deteriorate significantly. The experience of being in the asylum process puts significant stress on individuals who are faced with an enormous lack of control over their lives for an unknown length of time along with exclusion from wider society and a lack of right to take part in work, education, training etc.

18. Although there is a requirement for more specialist mental health services (particularly talking therapies which understand trauma without necessarily being full-on PTSD services), where possible, Coalition members want refugees and asylum seekers in Wales to enjoy the same access to mental health services as do others in Wales. Such services need to consider how they could best support the linguistic, religious and cultural needs of vulnerable migrants, and this might entail looking outside statutory service providers for support – to the third sector, to non-health services, and to the migrant communities themselves. Refugee Community Organisations (RCOs), faith

⁷ <http://gov.wales/dsjlg/publications/communityregendevol/refugeeinclusionstrategy/strategie.pdf?lang=en>

groups and support groups can also play a vital role by acting as a bridge between refugees and mental health care services.

19. Existing services and/or systems need to change, adapt or develop in, order for effective engagement to happen. A whole scale creation of specialist services is not recommended, as this could potentially be divisive and would not help integration – whilst also being unrealistic given the current economic climate. Fostering good mental health is not only the preserve of the health services, since issues such as the asylum system, quality of housing and access to services all have a massive impact. For further information on mental health services please see Mind Cymru's inquiry submission.

Recommendation 11: Better collaboration is needed between third sector and statutory mental health provision and across government departments – the Welsh Government seem to have several divisions involved in this work without any proper joined up thinking between themselves and with important migrant health services like Cardiff Health Access Partnership (CHAPS). The Mental Health Sub Group of the Syrian Operations Board would provide a good starting point for this collaboration to happen.

Recommendation 12: Better initial health screening is needed to identify issues as early as possible. This needs to be undertaken by properly trained clinical staff alongside support for asylum seekers and refugees to better understand and express their mental well-being.

Maternity and Children

20. Much more needs to be done to improve maternity services for asylum seeking and refugee women. We know that women experience hardship during pregnancy and struggle to access support services. Research⁸ undertaken by the Refugee Council in England exposes many areas of concern which we feel are likely to be mirrored in Wales. In addition, evidence shows that maternal deaths among asylum seekers and refugees are high - 14% of maternal deaths in the UK are asylum seekers and refugees even though they only make up 0.5% of the population.⁹ More could be done to help support awareness of issues for both asylum seekers and midwives and to facilitate networks to share best practice using the Maternity Streams of Sanctuary model¹⁰ A small input in this area could have a big impact in terms of reducing maternal deaths for asylum seeking and refugee women and improving outcomes for all.
21. For example, Swansea City of Sanctuary held a Maternity Workshop in March 2016, attended by health board staff, students and the third sector. It identified a number of issues, ranging from appropriate cultural awareness to access to appropriate finance. One issue that could be fairly easily addressed for the asylum seeking and refugee community is a lack of awareness of what services are generally available in the UK so people don't know what to ask for. City of Sanctuary in Wales are planning a maternity work-stream in Swansea, potentially opening up across Wales later in 2017 and would be very keen to support Welsh Government/NHS research/action in this area.

Recommendation 13: Welsh Government to commission research from community, third sector, Public Health Wales & local health boards to map needs, identify good practice and develop an action plan to support collaboration across sectors to address identified needs.

⁸ http://www.refugeecouncil.org.uk/assets/0002/6402/When_Maternity_Doesn_t_Matter_-_Ref_Council__Maternity_Action_report_Feb2013.pdf

⁹ <http://www.centreformidwiferyeducation.ie/news/cmace-2011-saving-mothers-lives>

¹⁰ <https://maternity.cityofsanctuary.org/>

Education

English for Speakers of Other Languages (ESOL)

22. Improvements are required in the local availability of and access to English for Speakers of Other Languages (ESOL) classes. This is essential, as the ability to speak English has an enormous impact on the ability to integrate, social outcomes and community cohesion. Barriers preventing people, particularly women, accessing ESOL classes include a lack of childcare and transport, as well as issues around the timings of classes. With class intakes often commencing annually, individuals who arrive at other times in the year are often forced to wait many months before accessing formal provision. The provision of more advanced ESOL Level 2+ classes is incredibly limited and not adequate to support the need identified. To our knowledge, there is no evidence of ESOL provision versus ESOL need. This could be done in partnership with Migrant Help and/or the Home Office housing provider (Clearsprings) to monitor English language ability on arrival. Migrant Help could also play a role in monitoring skills, educational qualifications and previous work experience.

Recommendation 14: The Welsh Government should, for transparency, clarify how and whether they are meeting ESOL need and addressing barriers to access. Gender analysis of need and provision is also required because of the additional barriers facing women (e.g. caring responsibilities, cultural barriers). A limit on waiting time should be set to ensure people can access courses as quickly as possible.

Recommendation 15: There is a need for increased funding/places for ESOL (including informal schemes such as FAN Groups and conversation clubs as well as formal course places). Action is also needed to ensure adequate ESOL provision in new dispersal and resettlement areas, for example the under the Syrian VPRS. This should include training of volunteers and linking to the context of everyday life and knowledge needed by newcomers. It should also include transport provision.

Equality of Access to Education

23. The Welsh Government needs to work with the education sector to ensure equality of access for refugees and asylum seekers. There is no detail in the Delivery Plan on the Credit and Qualifications Framework for Wales (CQFW), which was successfully trialled by Displaced People in Action (DPIA) to enable sanctuary seekers to have prior learning recognised and limit the need to repeat training and education unnecessarily. The CQFW is particularly useful for refugees and asylum-seekers as they often arrive without evidence of prior qualifications and training having fled their country of origin. A lack of consistent follow-up and resources to ensure the CQFW remains available means it is effectively non-existent for refugees and asylum-seekers now. Some colleges do not seem to be aware of the CQFW and even if they are it is often not advertised. We would like to see a requirement to make this consistently available as well as monitoring take up and sharing best practice
24. Access to higher education (HE) for asylum-seekers is limited by the approach of institutions, which treat asylum-seekers as international students in most instances. NARIC (national agency for the recognition and comparison of international qualifications and skills) cost is an additional barrier which asylum-seekers most often cannot afford, effectively costing up to two weeks of income or thereabouts, and constituting a further discriminatory barrier to HE. In order to widen access, improve integration and enable refugees and asylum seekers to progress in Wales, the Welsh Government could support HE institutions with embedding local fee rates for asylum-seekers as a matter of course. It could then add this as an indicator of progress towards the goal of becoming a Nation of Sanctuary.

Recommendation 16: Welsh Government should invest in systemic support for the transfer and recognition of qualifications: an education and employment advisor in each of Wales' dispersal areas and NARIC membership for lead organisations.

Recommendation 17: The Welsh Government should improve asylum seeker access to tertiary education by developing an appropriate system of student support. This is currently a huge barrier as asylum seekers are treated as international students and required to pay up front.

Recommendation 18: Working with businesses and business sector to improve access to apprenticeships, volunteering, strategic work placements. We would encourage Welsh Government to lead the way by proactively creating and celebrating volunteering opportunities within its own structure to legitimise volunteering for asylum seekers and myth-bust the belief that volunteering is not permitted under immigration law.

Recommendation 19: There is need for advice services to signpost people to FE/HE, to work, volunteering, and different employment support options for different professions and to revisit specialist employment advice, such as the Credit and Qualifications Framework for Wales (CQFW) and learn from good practice such as the DPIA Wales Asylum Seeker and Refugee Doctors (WARD) scheme for asylum seeking and refugee medical doctors¹¹.

25. Transport costs are a big barrier, limiting access especially for asylum seekers to necessary ESOL classes, which, unlike many other community services, are not often available locally and require substantial travel costs. A lack of travel support prevents young asylum-seekers from continuing to sixth form college level, as there is no funding for public transport. Many young asylum-seekers are leaving school/ college because their parents cannot afford travel costs and the young people are prohibited from seeking work so their lives are placed on hold to their short and long-term detriment.

Recommendation 20: We advocate setting up a scheme for free/subsidised local transport for asylum seekers in partnership with bus companies and local authorities across Wales.

26. Whilst we recognise that Job Centre Plus is not a devolved responsibility, Coalition members regularly hear reports from refugees with limited or no English language skills being only offered interpretation at their first appointment. This leads to miscommunication and subsequent benefit sanctions as well as difficulties in securing employment.

Recommendation 21: We would ask that the Welsh Government supports schemes to provide support and interpretation to refugees where required in attending such appointments.

The pace and effectiveness of the Welsh Government approach to resettling refugees through the UK Government's Syrian Vulnerable Persons Relocation Scheme (SVPRS)

27. By the end June 2016, Local Authorities in Wales had resettled 112 refugees from Syria through the SVPRS. By the end October 2016, 17 out of 22 Local Authorities had welcomed Syrian refugees through the scheme, with all others preparing to do so by December 2016.

28. The Home Office leads on the scheme, with the Welsh Government facilitating a Taskforce and an Operation's Board to co-ordinate the arrival and effective integration of people. Membership of the Taskforce and Board includes representatives from health, local government, the third sector, the private sector, the Home Office and police. Initially set up to oversee the effective implementation of the SVPRS, the remit of these bodies has been extended to include a Children's Task and Finish Group, which looks beyond the SVPRS to other Home Office schemes such as the Vulnerable Children Resettlement scheme¹² and the UASC National Transfer Scheme¹³.

¹¹ <https://www.dpia.org.uk/our-projects/ward-group/>

¹² <https://www.gov.uk/government/news/new-scheme-launched-to-resettle-children-at-risk>

¹³ <https://www.gov.uk/government/publications/unaccompanied-asylum-seeking-children-interim-national-transfer-scheme>

The Welsh Refugee Coalition welcomes Welsh Government's coordination role re the SVPRS, though also seeks reassurances that:

Recommendation 22: The Welsh Government must facilitate the systematic and rigorous collection and dissemination of information about what works and what doesn't in terms of newcomers feeling welcome, safe and able to integrate. This is especially important in areas where people are resettled in areas without diaspora communities and where a Local Authority is new to the provision of refugee support. It is vital that the experiences and opinions of people who have been resettled are included as an integral part of this learning. Learning should be captured from all relevant public services and key areas of interest should include safeguarding, utilisation of skills, positive stories and community support.

Recommendation 23: Welsh Government, as part of planning and readiness to engage effectively and rapidly with future crises, should require and resource Local Authorities to incorporate refugees in their civil contingency and emergency planning exercises and plans.

29. The Welsh Government has been vocal about their support for the SVPRS in Wales. In line with our concerns about the development of a two-tier system for refugee welcome and support, we also have concerns that poor public understanding of the need for international refugee protection is being further eroded with an almost exclusive emphasis on SVPRS.

Recommendation 24: We would like to see Welsh Government demonstrate leadership and proactively promote positive public messages and narratives about *all* refugees being welcome in Wales, as well as the benefits of migration.

30. An issue that may require consideration is the impact of the introduction of Local Housing Allowance (LHA) maxima rates within social housing. We understand that the SVPRS will support full recoverable costs in the first year but not past that. LHA rates may be an issue in terms of people sustaining tenancies after the first year if costs are not fully recoverable. Further, those who are single and under 35 will access the shared rate of the LHA rate under the changes to the LHA maxima. This is something that needs to be considered in terms of any single people in terms of support going forward post year 1 -5 of the SVPRS.

Community Cohesion

31. Refugees bring skills and experience which enhance their new communities – in sport, arts, culture, faith and schools. Funds for refugee inclusion are often better used to enable access to mainstream provision and community activities rather than for special projects. The participation of refugees and asylum seekers should be normalised as part of everyday life.
32. Awareness-raising is an essential part of building community cohesion. This means more than supplying information and going beyond depicting refugees as needy survivors of trauma. It means humanising the 'refugee' through positive stories about their contribution to Welsh life and by maximising opportunities for other local people to meet, hear from and work alongside refugees. It also means publicising the variety of ways in which welcome and support is offered to refugees by Welsh people and includes awareness-raising within refugee communities themselves.
33. 'City of Sanctuary' is a movement of people across the UK and Ireland who seek to create a culture of hospitality and welcome for people seeking sanctuary. As well as two established 'Cities of Sanctuary' in Swansea and Cardiff, people across Wales have been responding to the refugee crisis in towns and villages across the country, setting up schemes which offer support and welcome. The generosity and compassion of people in Wales should be recognised and celebrated. The Welsh Refugee Coalition supports the establishment of Wales as the world's first 'Nation of Sanctuary'. The Welsh Government can play its part in making this a reality by publicly supporting

the movement, and by enacting policies and practices which promote safety and inclusion for all asylum seekers and refugees in Wales.

Recommendation 25: Welsh Government:

- Encourages pledges of support for a Nation of Sanctuary from local authorities, AMs and MPs, and public, voluntary and private sector organisations.
- Identifies and delivers actions which they and AMs can take towards making Wales Nation of Sanctuary a political and social reality.
- Pledges to use positive language when speaking of asylum seekers and refugees, and to speak out against and correct discriminatory or prejudiced language, or false information, about people seeking safety in Wales.
- Take an active role in spreading positive messages and stories about asylum seekers in the media and in developing community action to tackle hate crime and encourage positive messaging around integration.

Arrangements for Unaccompanied Asylum-Seeking Children

34. The Refugee and Asylum Seeker Delivery Plan states that UASC will have access to independent advocacy in respect of the duties owed to them under the Social Services and Well-being Act 2014. In this regard, UASC have a statutory right to advocacy the same as any other looked after child in Wales. However, UASC, asylum seeking and refugee children all have specific vulnerabilities and need access to dedicated services. To our knowledge no such support exists for UASC in Wales despite previous commitments from Welsh Government to explore ‘the need for a Guardianship model¹⁴ for Wales’. Coalition members are also concerned that advice and support for children now appears to be included with the specification of Welsh Government’s Refugees, Asylum Seekers and Migrants Inclusion Project which is under resourced.
35. It is now over 10 years since Save the Children with Cardiff University published their ground breaking report ‘Uncertain Futures’¹⁵ which advised Welsh Government to consider how best it can provide accessible, specialist and well-funded independent advocacy support for UASC in Wales. The 2016 Concluding Observations¹⁶ from the United Nations Committee on the Rights of the Child also called for ‘statutory independent guardians for all unaccompanied and separated children’, raising their concerns over the lack of support for, and increased vulnerability of this group of children and young people. They also called for ‘sufficient support to migrant, refugee and asylum-seeking children to access basic services’.
36. Coalition member, Children in Wales have long called for Wales to develop a model akin to the Scottish Guardianship service¹⁷, as independent evaluations have demonstrated the value this specialist service brings to vulnerable children and young people. Such a service would complement and add value to the existing support provided by local authority commissioned advocacy services, yet action to meet the specific needs and issues of this group of children through specialist support for UASC in Wales has remained limited at best. Such support for UASC should be seen as part of Welsh Government’s safeguarding duties and commitment towards prevention. Coalition members have serious concerns that a lack of such provision in the early

¹⁴ http://www.scottishrefugeecouncil.org.uk/how_we_can_help/advice_services/the_scottish_guardianship_service

¹⁵ https://www.savethechildren.org.uk/sites/default/files/docs/uncertain_futures_summary_1.pdf

¹⁶ <http://gov.wales/docs/dsjlg/publications/cyp/160727-final-concluding-observations-2016-en.pdf>

¹⁷ http://www.scottishrefugeecouncil.org.uk/how_we_can_help/advice_services/the_scottish_guardianship_service

weeks after arrival results in preventable harm to vulnerable children and can lead to increased risk of exploitation and trauma, and recourse to more costly interventions later on. Support workers report meeting children far too late after arrival, such that 'the light has gone out and the child/young person has no hope for future'. Vulnerability needs to be recognised from day one, with automatic access to independent specialist Guardians that can ensure children and young people are enabled to receive dedicated advice, support and advocacy, with signposting to other relevant services.

37. The numbers of UASC in Wales are relatively low and so providing an effective guardianship service should not be too costly. Funding such a scheme should be considered preventative spending in line with the principles of the Well-being of Future Generations (Wales) Act 2015. A system of guardianship would not only bring improved outcomes for children and young people, but should also contribute to efficiencies and cost-savings for key agencies working with separated and trafficked children. Without such support, we are not fulfilling obligations under UN Convention on Rights of the Child and are failing future generations, leaving them at risk of exploitation. Consideration will also need to be given to ensuring that transition arrangements are in place once a UASC reaches adult status.
38. Members of the Coalition also have concerns about age assessment process and what happens to young people while they are being assessed. For example, some young people have been living in initial accommodation at Lynx House while waiting an age assessment decision. This is totally inappropriate.

Recommendation 26: Welsh Government fund a Welsh Guardianship Service to work with children and young people seeking asylum in Wales. Appointed Guardians will support young people by helping them to navigate immigration and welfare processes, feel supported and empowered throughout the asylum process and assist them to access the help they need when they need it and help them make informed decisions about their future.

Recommendation 27: Welsh Government works with Local Authorities to explore the possibility of providing supported lodgings and supported housing projects for older UASC (16/17 years) and to ensure that permanent move on accommodation is made available when young people are ready to live independently.

Recommendation 28: Training on care and protection of asylum seeking children should be a compulsory part of professional qualification for relevant public body professionals e.g. social workers, teachers etc. Existing practicing professionals should have access to on-going training as part of their professional development.

For further information please contact:

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<p>African Community Centre Amnesty Cardiff Asylum Justice British Red Cross Children in Wales Christian Aid Cymru City of Sanctuary Cytun – Eglwysi Ynghyd yng Nghymru/Churches Together in Wales Displaced People in Action Diverse Cymru Ethnic Youth Support Team Evangelical Alliance Wales Henna Foundation Hope not Hate Cymru Just Across – Wrexham Oasis Cardiff Oxfam Cymru Race Council Cymru</p>	<p>Race Equality First Save the Children Cymru Share Dydd Swansea Bay Asylum Seekers Support Group Taff Housing Association Tai Pawb TCC (Trefnu Cymunedol Cymru / Together Creating Communities) The Syrian Association of Wales Trinity Centre Tros Gynnal Plant Unity in Diversity Welsh Centre for International Affairs Welsh Refugee Council Women Connect First Women Seeking Sanctuary Advocacy Group Wales</p>
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