

Cyflwynwyd yr ymateb hwn i'r [Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) ar gyfer yr [ymchwiliad i Gydlyniant Cymdeithasol](#)

This response was submitted to the [Equality and Social Justice Committee](#) on the [inquiry into Social Cohesion](#)

SC 22

Ymateb gan: **Bevan Foundation**

Response from: **Bevan Foundation**

The Bevan Foundation is Wales' most influential think-tank. We create insights, ideas, and impact that help to end poverty and inequality. The Access to Justice project seeks to improve access to justice for migrants and their families in Wales. We are grateful to have the opportunity to submit written evidence to the Equality and Social Justice Committee's exploration of the issue of social and community cohesion.

1. Key issues impacting social cohesion in Wales

1.1. Strategic direction

Social cohesion is a complex issue, with diverse factors feeding into people's sense of belonging, community, and a shared future, and myriad and changing tensions which threaten to undermine cohesion and trust. Effectively monitoring, maintaining, and promoting cohesion requires shared goals drawn from participation across social groups, coupled with strong strategic leadership and a clear direction.

Engaging with the strategy would be better enabled by clear publication of the agreed strategy and regular updating of the National Delivery Plan. The version of the Plan linked to this consultation, for example, is dated 2016-17. No separate publication of the strategy could be found online, only an evaluation of it. It is hoped that the Committee's exploration of this issue will lead to a revised and published strategy and an updated Delivery Plan formed in partnership with communities and third sector organisations. This would improve transparency and public engagement.

1.2. Responding to anti-migration hate crime

The anti-migrant civil disorder and violence that swept the UK in 2024 prompted shock and statements of support and welcome for refugees and migrants from statutory bodies and third sector organisations. For many working within the refugee and migrant sector, the attacks on hostels and communities were an expression of growing unrest prompted by political rhetoric and far-right organising that had been steadily building in previous months and years. Wales is no exception, as

demonstrated by divisive demonstrations and far-right activity in the community around Stradey Park in Llanelli and far-right protests led by Patriotic Alternative in Llantwit Major in 2023, and threatened actions from the far-right which led to temporary closures of immigration advice and support agencies in August 2024. Such demonstrations of hate often go beyond opposition to current migration and include Islamophobic slogans, attacks on mosques, and racist rhetoric.

Policy makers must acknowledge that the political and social environment for sanctuary seekers and people who have migrated to the UK remains toxic. For example, in January 2025, a post shared by X owner Elon Musk resulted in death threats to staff at Welsh Refugee Council. A climate of fear persists around activities to support migrants or attempts change policies to promote rights or inclusion.

Any solutions for social and community cohesion must include robust and swift responses to stop misinformation and to challenge racism and threats against migrants, using the law where possible.

Migrant communities and individuals must be protected by the full force of the law.

Policy makers need to take a robust stance on anti-racism and withstand pressure to avoid making positive statements or progressive policy changes on migration. Bowing to pressure from vocal anti-migrant groups increases social tensions and division by emboldening the far right.

Politicians must be held to account for racist, hate-promoting, or irresponsible rhetoric against migrants, refugees, or minority ethnic communities.

Policy makers should work with communities and key agencies to prevent tensions from building and not wait until they emerge (see 1.7)

1.3. Modern slavery and exploitation

The Bevan Foundation's [recent study into people's experiences of seeking legal advice and representation in Wales](#) found that people are often pushed into exploitation and potential slavery by the lack of availability of legal services and rights advice in Wales.

People spoke to us about losing their homes, their right to work, or their employment sponsorship as a result of not being able to make an immigration application on time, leaving them in vulnerable situations and without the economic safety net of the welfare system. Fear of losing income drives people into informal and exploitative work arrangements, In this and previous studies people have told us about being forced to sleep at their place of work, being mistreated by employers, and feeling unable to challenge abuses.

Social cohesion efforts must acknowledge and overcome barriers to justice. Clear and accessible avenues to low-cost and free advice and representation are essential so that people can maintain their legal status and their right to work and remain in regular employment within the formal economy.

Wales still has no independent national guardianship scheme for Unaccompanied Children, leaving children open to exploitation and leaving gaps in current services through which Unaccompanied Children vulnerable to exploitation, trafficking, and modern slavery can slip. The Bevan Foundation's [briefing on Guardianship](#) outlines a service that would protect this extremely vulnerable and traumatised group of children.

Wales must introduce a robustly independent, national system of guardianship to protect and improve outcomes for Unaccompanied Children.

1.4. Supporting the inclusion of asylum seekers, refugees, and migrants (and preventing, addressing, and monitoring community tensions around migration)

The Bevan Foundation's [report on No Recourse to Public Funds](#) (NRPF) in Wales demonstrates the scale of work needed to address the lack of understanding, information, and strategic direction around the issue of NRPF. While the NRPF condition is a UK government policy, there are many interventions that Welsh Government and local authorities can make to improve support and access to services.

Ensuring that people are aware of and receive their full entitlements is a cornerstone of inclusion and of social cohesion.

Policy makers and service providers must take a rights-based approach to delivery of services, ensuring that people's rights are respected and their needs met.

Our [conversations with international students](#) have revealed that universities in Wales are recruiting from abroad while prospective students have inadequate information about what to expect when they arrive in Wales. Meanwhile, there is not enough communication and planning between universities and key services and authorities, and support for students is sometimes inadequate. Housing is scarce, and the associated costs of extremely high rents, rent guarantors, immigration fees and the health surcharge, coupled with the rising cost of living and problems with the devaluation of currency, have forced many to spend savings for their annual maintenance within a very short space of time. International students are a very visible minority in some areas of Wales and increased pressure on food banks and other services used by people in poverty makes them a potential target and could cause community tensions.

It is essential that universities plan recruitment in advance jointly with other key bodies, that communities are engaged and informed, and that students and their

families are adequately supported to establish their lives and integrate into their local community.

Home Office dispersal of people seeking asylum can cause serious community tensions, particularly when people are placed suddenly, in unsuitable accommodation, with negative media attention, and visibly in the heart of communities with inadequate resources. Often, such tensions arise before people even arrive. Protests, often organised or capitalised on by the far right, can inflame tensions to breaking point. People placed in hotels or asylum hostels can be placed at serious and life-threatening risk. Other visible minorities within the local community can easily become targets of hate speech and violence.

It is vital that asylum dispersals are properly planned. Welsh Government and local authorities need to work in partnership with the Home Office, landlords, communities, and key services, to develop a strategy long before placement is agreed.

Partnerships should focus on housing people in community housing where they can integrate and form relationships with neighbours.

Planning should ensure good levels of service and support for all, minimising competition, raising awareness and understanding, welcoming people and informing them of their rights, and integrating and uniting communities to help prevent tensions from arising.

1.5. Minimising the impacts of poverty on migrant individuals, families, and communities

Barriers to accessing services, lack of awareness of people's rights to services and support, and lack of understanding of local authority duties and powers in respect of people with NRPF are significant drivers of poverty.

Maximising incomes and taking a creative and proactive approach to providing support will help to prevent crisis and destitution. This, alongside navigating pathways out of destitution are essential for supporting inclusion.

Barriers to accessing justice force people into poverty and destitution. Our [recent study](#) found that 40% of people we spoke to with a current legal case were unable to access any legal help at all. Half of these were seeking asylum. Being unable to access timely legal advice and representation led to people:

- borrowing money for immigration advice and/or fees, or paying large amounts in instalments, even where they were eligible for legal aid
- losing a job or employment sponsorship
- being unable to work or enter education, resulting in long term financial impacts

- having limited or no income as a result of the above, making it difficult to pay for rent or food
- losing a home, or temporary accommodation
- emotional and material impacts on their children.

In this study, 21% of participants seeking sanctuary and 28% of others reported financial impacts of seeking legal advice.

The recently renewed Single Advice Fund includes virtually no provision for immigration legal advice. What advice is covered is limited to Level 1 under the Immigration Advice Authority's (formerly OISC) registration scheme, which is the most basic level of advice. This does not allow for substantive casework or representation at court or tribunal. There is currently overwhelming demand in Wales for immigration advice and representation at higher levels (see 1.6).

If social cohesion is to be achieved successfully schemes and funding in Wales must stop excluding the needs of refugees and migrants.

In secondary schools, free school meal eligibility is assessed by household income, measured by receipt of either specific welfare benefits or of asylum support. The immigration status of a child's parents has a direct affect on their eligibility for free school meals. This is despite the fact that:

- immigration restrictions on public funds do not include free school meals
- children in England who are affected by No Recourse to Public Funds do have eligibility for free school meals.

[Even where their household income is zero, children with NRPF are going hungry whilst their peers are fed.](#)

Free school meals are a vital mechanism in addressing child poverty, easing the household budget, and ensuring inclusion in schools. They also perpetuate racist discrimination. In a study of NRPF by the Unity Project in 2020, 90% of families responding had at least one British child, 95% of whom were black and minority ethnic children. None would be eligible for free school meals under current rules in Wales.

We cannot address poverty unless we include all children in measures to tackle it.

If policies in Wales exclude migrants and the children of migrants, then they are laying the ground for a divided society.

1.6. Rights and access to justice

The integration of asylum seekers and refugees underpins the Welsh Government's Nation of Sanctuary Plan. Without timely access to justice, people seeking sanctuary in Wales are unable to settle or feel any true sense of belonging. Failure to access immigration advice and representation results in the loss of rights, employment, housing, and immigration status; all important factors for social cohesion, and can lead to destitution or deportation.

Demand for immigration advice in Wales far outweighs the available provision. [Bevan Foundation research](#) shows that 60 per cent of immigration legal aid offices in Wales closed in little over five years. Only five immigration legal aid providers remain in Wales, and provision outside of the scope of legal aid is extremely limited. Most people in our recent study had found it difficult to find immigration advice and representation, with many people now travelling as far as London, Southampton, Manchester, or the English Midlands to find a solicitor. 40 per cent found no help at all.

Lack of access to legal services leads to very high levels of exploitation. A high proportion of people we spoke to indicated that they had used unregulated or unscrupulous advisors. This included a disclosure of sexual and financial exploitation by interpreters gatekeeping for solicitors and using Whatsapp groups. Several people spoke of being made to pay legal representatives thousands of pounds for representation, often for little or no return, and of being forced into debt.

The low quality of available legal advice is also a serious issue and has led to people losing status and being denied rights.

Many people we spoke to did not know their rights or that they had rights. Families are particularly vulnerable to exploitation, particularly single women with children. As well as financial impacts of the lack of legal advice and representation, people disclosed:

- impacts on emotional and mental health
- impacts on physical health
- legal impacts such as delays, refusal or deportation
- being at risk of or experiencing exploitation.

Barriers to justice mean that many people cannot exercise their legal rights to renew and change status, lift NRPF conditions, engage in employment, education, and the economy, or support themselves and their families. This places people long term in a parallel, second class, community. While immigration law and policy is reserved to UK government, provision of legal advice and access to justice falls firmly within devolved responsibility.

Barriers to justice must be lifted in order to enable people to access their rights, engage in the economy and community, and progress to settlement and citizenship.

2. Examples of best practice and other interventions

2.1 Partnership working

Developing effective and practical partnerships between statutory bodies, the third sector, people with lived experience of relevant issues, and local communities can make a significant difference in developing services that meet the needs of all and address potential points of tension and conflict.

The Bevan Foundation has brought together [a partnership](#) with three local authorities, the No Recourse to Public Funds Coalition Wales (a network of third sector organisations), and diverse groups of people with lived experience of No Recourse to Public Funds to develop a model of working and practical outputs with the aim of tackling child poverty in Wales amongst children whose parents have NRPF. There will be an event to share learning from the project at the end of March.

2.2 Involving people with lived experience as equal partners

It is vital to involve communities and people with lived experience of key issues in the design and development of any strategy or plan to promote community cohesion. The Bevan Foundation is developing work with people with lived experience of migration. While we are still learning, we hope that there is some useful learning to be drawn from our project supporting people with lived experience of seeking sanctuary [to develop and deliver their own recommendations](#) in response to our research into experiences of justice.

2.3 The Scottish Guardianship Service

The Scottish Guardianship service provides an exemplary model which demonstrates that an equivalent in Wales has the potential to improve the lives of Unaccompanied Children and also to support social workers, other statutory roles, and other agencies. As in the Scottish model, a national Guardianship service in Wales would help Unaccompanied Children to navigate the complex asylum system and to ensure that procedures such as age assessments are conducted in the best interests of children. The service would reduce missing episodes, criminalisation, and exploitation. This has been reported most recently as a significant area of concern in a Senedd [Children, Young People and Education Committee report](#). The Scottish Guardianship Service states that where a guardian is involved, the numbers of missing children are very low and [an evaluation](#) shows that legal outcomes are much

improved. A national Guardianship Service in Wales is vital to help children to integrate, engage with education, and follow a smoother, more reliable pathway to adulthood and community inclusion.

2.4 Free school meals

In England, children with NRPF have been eligible for free school meals since 2020. Initially introduced under an emergency Covid-19 measure, the UK Government [permanently extended eligibility](#) via a policy change in March 2022. Eligibility is subject to maximum household income thresholds of between £22,700 p.a. to £24,800 p.a. The system ensures that all children are included in this vital anti-poverty measure, that migrant children are not singled out as exempt from community, and that entitlement and access is more consistent across local authorities.

2.5 Ending Destitution Together Strategy, Scotland

The [Ending Destitution Together Strategy](#) is a pioneering joint strategy between Scottish Government and the Convention of Scottish Local Authorities (COSLA). The aim of the strategy is to provide pre-emptive support that helps to resolve issues before people find themselves in crisis. The overall aim is to prevent destitution as a result of immigration status, reducing the need to navigate complex pathways out of destitution once it is entrenched. While the strategy has encountered challenges with regard to housing, it demonstrates [useful learning](#) in relation to developing a strategic partnership approach to end destitution and provide support for people with No Recourse to Public Funds.

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