

Equality, Local Government and Communities Committee Inquiry into Refugees and Asylum Seekers in Wales

Introduction

The Wales Strategic Migration Partnership (WSMP) is (one of 12 RSMPs) funded by the Home Office and is based at the Welsh Local Government Association. WSMP is a partnership organisation which has for 16 years provided an enabling function and a strategic leadership, advice and consultation on migration in Wales. The Partnership facilitates sharing of expertise, managing impacts and raising awareness of issues, risks and opportunities.

Submission on behalf of the WSMP

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

Background;

- a. The WSMP alongside all the UK Strategic Migration Partnerships, were tasked by the Home Office to take a lead role in coordinating the SVPRS, undertaking cross-government department liaison at UK level with the Syrian Programme Team and with Welsh Government, WLGA and local authorities and a wide range of partners to ensure that the programme is properly coordinated at a Wales level. In doing so we worked in tandem with structures established by Welsh Government – the Task Force and Operations Group and sub groups (mental health and communications).
- b. This builds upon previous work that WSMP have undertaken to support participation in the original Syrian and Afghan resettlement schemes, engaging and mobilizing partners on this agenda since 2013.
- c. The WSMP established a *Local Authority SVPRS Delivery Group* which has representation from all LAs and health, Police and DWP in Wales, which has proved key to delivery of the scheme in Wales in providing a mechanism for all LAs involved in resettlement to work collectively and learn from each other, and provide an interface with the Syrian Programme Team. To underpin this work and support operational planning, the WSMP developed a **SVPRS Toolkit** which was disseminated to all 22 LAs and has been widely used to assess their capacity to participate in the programme and organize local/regional multi agency partnerships to deliver the requirements of the scheme.
- d. Regarding the **pace**, Local authorities in Wales have been criticised in some quarters for not responding more quickly and taking greater numbers of refugees. However, we have always been clear that we want to deliver *sustainable* refugee resettlement in Wales; it is not just a question of numbers of refugees settled, and that careful thought and meticulous planning needed to go

into the implementation of such a wide ranging and complex scheme, keeping at its heart the very vulnerable refugees who have applied for resettlement.

- e. Given that in Wales we did not have the benefit of experience in previous UK Government protection programmes, and only Swansea, Newport, Cardiff and Wrexham are asylum dispersal areas, the remaining Local Authorities were largely new to refugee resettlement, and therefore more time was needed to put effective plans in place.
- f. RSMPs with a bigger staff complement are abler to provide the one-to-one engagement with LAs that supports engagement in the scheme, and in some areas this may have led to earlier engagement with the scheme and higher numbers resettled. Until October 2016 the WSMP Director has been leading on the coordination single-handedly on behalf of the WSMP, alongside delivery on other Home Office priorities; the SRP and associated Community Sponsorship Programme is only one of a number of UK Government schemes which are a high priority at the current time including:
 - Increasing the number of asylum dispersal areas in Wales
 - A National Transfer Scheme for unaccompanied asylum seeking children
 - The Vulnerable Children's Resettlement Scheme set to receive 3,000 children and families from the Middle East and North African region.
- g. However, after a relatively slow start for the reasons articulated above, the SRP team are now more than satisfied with the Wales response, and as we move into the second year of the programme, momentum has gathered and, according to recently published Gov.UK figures, we have resettled 294 refugees and two families from the VCRP (with another family due to arrive in January).
- h. The SRP have signalled the need to maintain momentum; the WSMP, like all regions in the UK have been tasked with moving to a **regional** approach to resettlement which will be coordinated centrally by a 'Refugee Resettlement Coordinator. This person will provide the interface between the HO and LAs in Wales, rather than the HO having to engage with all 22 LAs. It is proposed that this has a number of anticipated benefits for both central and local government:
 - *Undertaking a matching allocation and coordination role for Wales on behalf of participating LAs*
 - *The ability to work more collaboratively to share knowledge*
 - *The ability to rapidly deploy a range of resources locally and regionally*
 - *The ability to capitalise on existing mainstream capacity and partnership arrangements and build new arrangements*
 - *The ability to use the funding available to secure economies of scale and jointly commission services*
 - *Ability to identify solutions to a range of challenges*

2. Effectiveness of SRP Scheme delivery;

- a. The SRP is a cross-UK Government scheme implemented by local authorities-in which sense the WG ability to influence the pace and effectiveness has been

around strong political leadership and garnering senior level support and resolution of strategic/policy issues, to underpin the work of Welsh Local Authorities. All 22 authorities in Wales are committed to participation (*- note that Wales appears to be unique in this respect*).

- b. The leadership provided by Welsh Government in establishing a Task Force and Operations Board to ensure an all Wales approach, and senior level buy in of all relevant partners, and the WLGA in gaining political commitment has been key to the success of the scheme in Wales.
- c. In summary, the contribution of Local Authorities and their partners thus far in participating and receiving refugees during the first phase of Syrian refugee resettlement and in responding to a pressing humanitarian need has been acknowledged at all political levels. The compassionate and proactive, can-do approach to delivering resettlement by LAs in Wales should be recognised and celebrated, alongside the support offered by communities across Wales.
- d. However, there are a number of challenges going forward which may impact on the pace and effectiveness of the scheme, as follows;

e. **Key issues and risks;**

- Maintaining momentum and delivering sustainable resettlement across 22 local authorities, (alongside delivery on all the other HO migration priorities) will require the ongoing support and proactive engagement across WG to support and drive forward national solutions to strategic issues.
- The potential increase in complexity of the scheme; for example, aside from an increase in the number of complex and ‘mobility’ cases needing to be resettled, there may be an increase in Community Sponsorship applications across Wales, which will require LAs to consider, approve and monitor, and Local Authorities also now need to work out how to deliver the anticipated benefits of the extra ESOL monies being made available by UK Government. There will also be an increasing focus on integration aspects of the programme going forward.
- Maintaining momentum on the SRP scheme will be to a large extent dependent on the availability of housing, and reductions in the welfare benefit cap will have an immediate impact of SRP beneficiaries who tend to have larger family sizes. Therefore, **special attention and focus** should be given to overcoming these and other housing related issues.
- Identifying suitable housing of the right size in the right location has been the biggest challenge affecting the scale and pace of the programme, and will continue to be so going forward. This may slow down the pace if national solutions are not found.
- A lack of trained and qualified interpreters in some areas of Wales has been reported, alongside a reluctance to use interpreting services and language line

in some health settings. There has been a suggestion that WG consider funding a course for Arabic speaking interpreters.

- Access to culturally sensitive mental health services: there needs to be more concerted planning and consideration of issues around waiting lists through mainstream mental health service provision and consideration of how services best support the linguistic, religious and cultural needs of refugees. See mental health (below).
- There is an increasing disparity between the level of resource allocated to different categories of refugees, but starkest in comparison between Syrian Resettlement Programme beneficiaries and so-called ‘spontaneous’ arrivals of adults from Syria who sought asylum via the normal route. WG and partners will need to ensure that benefits and good practice re SRP are realised to the benefit of the wider asylum seeker and refugee population, where possible.
- Isolation - especially for refugees in areas without diaspora communities. Many refugees are very happy with their resettlement but some feel isolated and unsettled and this has the potential to undermine the reputation of the scheme. LAs have worked very hard to address these issues, and in areas which are less diverse, to promote refugees’ independence, making links with services and communities which will support their integration.
- As the scheme matures we will need to consider proactive work around identifying refugees’ skills and development of approaches to enhance employability.

f. Opportunities:

- Community Sponsorship, additional ESOL funding and the willingness and commitment of UK Government to ensure the success of the scheme offers opportunities to support broader work across the migration agenda. For example, LAs are beginning to develop capacity on resettlement which may make them more likely to participate in other asylum and resettlement schemes in the longer term.

3. The effectiveness of the Refugee and Asylum Seeker Delivery Plan

- a. The WSMP welcomes ongoing work and commitment by Welsh Government on Refugee Inclusion and responded to the consultation on the Delivery Plan in 2015. A summary of our key points, updated to reflect the new context, is as follows;
- b. Overall, the Delivery Plan needs revision due to the dramatically changed context for the work and following on from heightened profile around increased number of asylum seekers entering Europe (due to the ongoing situation in Syria, conflicts in the Middle East and several other areas which have reignited in the past five years). As a consequence, resettlement schemes are being implemented across the UK and Wales (albeit in small numbers). Thus WG Refugee and Asylum Seeker Delivery Plan needs to address much greater complexity; broader

geographies, different resettlement programmes and inclusion issues, and different levels of expertise and infrastructure across the twenty-two LAs in Wales.

- c. The Refugee and Asylum Seeker Delivery Plan should be reframed for the current context, and actions should be identified which prioritise and address risks and gaps flagged in this consultation, and which maximise opportunities and the development of infrastructures which may have benefits across the resettlement schemes.
- d. To support this work Welsh Government should consider a review of the established structures around migration (Syrian Operations Group and Task force, Refugee Children's, Communications and Mental health sub-groups), and consider convening an overarching high level **Refugee Policy Forum** to revise the Delivery Plan and drive forward strategic aims around integration of all asylum seekers and refugees in Wales – redefining the priorities in the current delivery plan given the dramatic change in scale and context for refugee and asylum seeker inclusion. This should be linked into the Programme for Government and all relevant Welsh and UK Government legislation and policy areas (including the Wellbeing of Future Generations Act, Wellbeing Needs Assessment, the UK Government Immigration Act).
- e. **Mental Health**; we welcome the initiative in the Delivery Plan to reduce stigma around mental health in some asylum seeker and refugee communities, and the proposal to set out WG expectations on the range of physical and mental health services which should be provided, but we are unclear how this is being taken forward.
- f. However, we are mindful that refugees are now being resettled across Wales, many of whom have complex needs including PTSD, who lack access to services.
- g. We would like to see better provision of specialist support which is accessible to refugees or asylum seekers wherever they reside in Wales, as part of WG strategy to improve access to mental health services for asylum seekers and refugees.
- h. We are mindful that WG has engaged with UK Government on mental health services for refugees but are yet to see any outcomes around this. Meanwhile the number of refugees in Wales potentially requiring services is increasing. For example;
 - The UASC National Transfer Scheme may eventually see unaccompanied children in every region of Wales: statistics from Dover, Kent, show that of their population of UASC, 41% had psychological symptoms; PTSD, depression, sleep disorder, flashbacks (aside from a range of physical health problems) and that the trauma experienced means an increase in the need for mental health support.
 - In a recent ADCS report, local authorities highlighted the mental and physical health of UASCs arriving in the UK as a common concern; over a third of

young people displayed psychological symptoms upon arrival, such as post-traumatic stress disorder, flashbacks and depression.

- i. Syrian Refugee Children: According to some research 79% will have experienced a death in the family. Almost half may display symptoms of post-traumatic stress disorder (PTSD) - ten times the prevalence among children around the world. Syrian refugee children will likely need ongoing, targeted support to bridge the gaps in their education, attain fluency in the host-country language, and deal with trauma and other mental health symptoms.
<http://www.migrationpolicy.org/research/educational-and-mental-health-needs-syrian-refugee-children>
- j. Some LAs in Wales are also resettling families from the *Vulnerable Children's Resettlement Programme* which will support children (and their families) at risk or having experienced violence, abuse, torture, trafficking, forced labour and FGM.
- k. We are aware that many GPs and mainstream services are not trained in complex trauma and PTSD and would ask WG and Home Office to expedite work around this. While WG have developed a **Mental Health Pathway** for the SRP scheme, there are real concerns about how accessible complex trauma services are across Wales, and whether they are able to respond to the increasing needs of significant numbers of new arrivals. The qualifying vulnerability criteria of the programme means that defacto, refugees arriving in Wales are likely to require some form of mental health service.
- l. We believe the actions in relation to mental and physical health require partnership work and strategic leadership in understanding and addressing the complex health needs of asylum seekers and refugees and vulnerable migrants.
- m. Given that the *Wales Asylum Seeker and Refugee Health Advisory Group* (WASRHAG), chaired by PHW, no longer meets, we would ask that WG considers how the specific and specialist needs and issues for refugee communities in this new, more complex environment will be identified and addressed and confirm whether the WG Mental Health Sub Group is able to take on a broader remit such as that previously undertaken by the WASRHAG.
- n. **Health screening of asylum seekers at Initial Accommodation**; we support the ambition for provision of appropriate and timely health screening at initial assessment for asylum seekers but are aware that this provision has been problematic in recent years. Greater transparency and engagement is required by the service provider, and the ability to feed the concerns of our partners to the providers and commissioners of the service, so that we can identify issues and risks, and support continued improvement to the service.
- o. In recommissioning the screening service at the CRI, there are opportunities for improvements, most critically consideration of how to ensure the service is able to respond to demand, which it has struggled to do in the past, and measures to address the high levels of DNA and 'close the gaps' in relation to health screening, which has knock on impact for asylum seekers and for health services.

- p. **Homelessness policy and strategy** will need to address potentially increased level of destitution and street homelessness for failed asylum seekers (and illegal migrants), in light of potential Immigration Act impacts - which could impact across Wales.
- q. **Advice networks** may require specialist knowledge around no recourse to public funds and the intersection between LA duties and Immigration legislation. There is very patchy provision of specialist advice for asylum seekers and refugees in the established dispersal areas, and there may be increased need and challenges for advice services in all 22 Local Authorities who have or who are likely to see increased asylum seekers and refugee populations.
- r. **Immigration Act;** as a result of the Home Office terminating support to people who do not demonstrate they are taking steps to return etc., and the right to rent measures in the Immigration Act 2016, there is likely to be an increase in illegal migrants and failed asylum seekers with/without children presenting to local authorities if they are unable to find accommodation elsewhere, with friends, or in the private rented sector – at the very least for advice and assistance in managing their homelessness. If the family contains a child or vulnerable adult, then they may need assistance from social services in the form of accommodation or support.
- s. It is likely that failed asylum seekers will refer themselves to one of the LA dispersal areas in Wales alongside other migrants in those areas. However, there could be an impact in any LA areas in Wales.
- t. If they do manage to find accommodation in the PRS, they are more likely to be living in overcrowded poor quality housing, and if there are substantial numbers of people seeking access to the PRS at the bottom end of the market there will be implications for environment health, housing, child protection/POVA resources.
- u. **Impact on Gender-based Violence, Domestic Abuse and Sexual Violence;** if families are made destitute they will be at increased risk of violence and exploitation as has been evidenced in [WSMP](#) and [Oxfam](#) research.
- v. The WSMP no longer has the capacity to administer and chair a NRPF network and engage effectively in this policy area, and although it is a non-devolved policy area, the impacts continue to be felt and may increase in Wales. There are calls from the voluntary sector for such a network to be re-established to help mitigate the worst impacts and develop strategies to address them. There needs to be a more thorough-going assessment of the full and potential scale of NRPF in Wales and due consideration by WG and other partners of recommendations on NRPF in [‘Uncharted Territory’](#) and [WSMP/WLGA NRPF report](#).
- w. To address the gaps in service provision for women with NPRP and their vulnerability to homelessness, destitution, violence and exploitation, we would like to see WG provide a **Destitution Fund** along the lines of the fund made available in Northern Ireland by the Office of the Deputy Prime Minister (OFDPM). This is particularly important in the context of VAWGSADV context and would ensure that women and girls don’t become more vulnerable to violence and exploitation

through destitution. Evidence demonstrates that the fund has been most effective in addressing protection gaps related to domestic abuse and gender based violence.

- x. WSMP would welcome input from across WG on understanding and exploring the impact of the Immigration Act 2016 on individuals, devolved public service and local authorities in Wales, and identifying opportunities where devolved competencies could help mitigate any potential negative impacts.
- y. **Asylum accommodation;** Engagement and partnership work between Clearsprings and partners in Wales has been facilitated by WSMP and has resulted in improvements to the environment at the Initial Accommodation Centre, establishment of a Safeguarding Forum chaired by UKVI, and agreed processes for consultation on housing procurement and management of contingency arrangements, to an agreed process for accommodation of complex bail cases.
- z. Going forward, there is a need for Welsh Government to continue to actively engage with the UK Visa and Immigration Asylum Accommodation and Support Transformation (AAST) programme and help ensure that any new contract for asylum housing and support ensures lessons are learned from the COMPASS contracts, notably around safeguarding measures and standards, contingency arrangements, complaints processes and monitoring of accommodation standards

4. The support and advocacy available to UASC in Wales

- a. Advocacy support is especially important now that Wales is likely to see an increase in its UASC population due to the National Transfer Scheme. Recent world events have led to a significant increase of numbers in 2014-2016.
- b. The Home Office wants all local authorities to take part in a 'National UASC Transfer System' and there are altered expectations regarding pace, arrival and cohort. The Social Services and Well-being (Wales) Act underlines the importance of advocacy. Advocacy is important for UASC in Wales for the following reasons (as set out in WG COP);
 - speaking up for and with individuals who are not being heard, helping them to express their views and make their own informed decisions and contributions, and
 - safeguards individuals who are vulnerable and discriminated against or whom services find difficult to serve
 - speaks up on behalf of individuals who are unable to do so for themselves
 - empowers individuals who need a stronger voice by enabling them to express their own needs and make their own informed decisions
 - enables individuals to gain access to information, explore and understand their options, and to make their views, wishes and feelings known, and
 - actively supports people to make informed choices.
- c. Section 78 of the SSWB Act specifies that the local authority must have regard to the views, wishes and feelings of the child and any other relevant person in

making decisions about them. This may be facilitated by an advocate, a foster carer or a key worker. The [All Wales Practice Guidance on Safeguarding and Promoting the Welfare of Unaccompanied Asylum-Seeking Children and Young People](#) published by the WSMP highlights the responsibility of social workers to appoint legal representatives for the looked after child, appoint an appropriate adult to attend all immigration interviews, arrange interpreters within Children's Services and refer children and young people to advocacy services so that this group of children are able to access appropriate support through the immigration process.

- d. The Practice Guidance advises that those working with separated migrant and asylum-seeking children have some working knowledge of the asylum and immigration processes in order to support the children effectively through the process. Advocates should be appropriately trained given that appropriate methods of ascertaining the child's wishes and feelings must include a consideration of the child's religious beliefs, racial origin and cultural and linguistic background.
 - e. We are aware that there are issues around access to advocacy services for children and that work is underway to implement a national approach to statutory advocacy. We also know that there are also no specialised advocacy services for UASC. The little provision that existed, provided by *Tros Gynnal*, was highly localised (Newport and Cardiff) and this service ensured that the particular interests and needs of UASC were provided for. This project closed in 2016.
 - f. UASC in Wales do not have a system of *Guardianship* or support of the *Refugee Children's Panel* so it could be argued they are especially disadvantaged compared to UASC in other parts of the UK. It is therefore essential that UASC are informed about and able to access an advocate, and that the advocate uses interpretation where necessary, if UASC are to be afforded the same UNCRC rights as other looked after children in Wales.
 - g. The 2016 Concluding Observations 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.
 - h. Advocacy becomes even more important in the context of age disputes. The WSMP has developed and published an [All Wales Age Assessment Toolkit](#) and has delivered training to Social Workers in South Wales, to improve consistency and ensure adherence to best practice. In our experience, the issues surrounding age assessment which we identified and reported on (report available on request) remain to a large extent, unaddressed.
- 5. The role and effectiveness of WG's Community Cohesion Delivery Plan in ensuring the integration of refugees and asylum seekers in Welsh communities**

We support the aims of the WG in its CCDP and acknowledge that the work is critical in the wake of Brexit and the increase in profile and significance of migration, and make the following observations;

- a. Funding for the Community Cohesion Co-ordinators for 2017-18 is welcomed. This has enabled a more co-ordinated approach to be taken in relation to the Syrian Relocation Scheme in north Wales.
- b. The role of the Community Cohesion Coordinators has been critical in underpinning a regional, coordinated approach to resettlement. Their work in monitoring and managing community tensions that have arisen has been really important, and given added momentum and support by the work of the WG SRP Communications sub group.
- c. It is clear to us that there is a growing need to raise awareness and share knowledge about the rise in profile and scale of migration – to put it into perspective and counter some of the very negative, inaccurate and sometimes hostile media reporting about migration.
- d. This work is increasingly important in the wake of Brexit and the insecurity and rise in hate crime being experienced by the migrant community, the extent of which is largely underreported and not understood. The WG will need to consider actions to address this new context.
- e. There needs to be a more developed understanding of the causes of community tensions in this new context and methods to address them; for example, evidence shows that, is ‘myth busting’ is not necessary an inadequate tool for increasing knowledge and understanding of immigration, that we require more sophisticated and evidence-based approaches, and greater engagement with communities, to inform actions to address cohesion issues related to migration, and development of a **communications strategy**.
- f. The WG should consider actions to address community tensions around migration, building on previous research which acknowledges that socio-economic and political exclusion, poverty and deprivation are drivers of hostility to migrants and cohesion issues.
- g. The proposals to reform asylum support, together with potential impacts of other measures in the Immigration Act, including those around right to evict (and the Right to Rent Pilot – if rolled out nationwide), will have significant and wide-ranging impacts, as they may increase levels of poverty in migrant communities and social exclusion, with concomitant impacts on community cohesion.

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