



Response to Welsh Government's Nation of Sanctuary – Refugee & Asylum Seeker Delivery Plan, June 2018.

1. About the Welsh Refugee Coalition

1.1 The Welsh Refugee Coalition was established in 2015. We are a coalition of 47 organisations working with asylum seekers and refugees at all stages of their journey, and with the communities in which they live. We work together to ensure that our resources are used to best effect and aim to speak with a coherent and strong voice on policies and practices affecting people seeking sanctuary in Wales.

2. Summary of our response

2.1 The Coalition welcomes Welsh Government's interest in and commitment to addressing the needs and aspirations of people moving through the asylum process in Wales and in line with other citizens in Wales, to improving the conditions, opportunities and enjoyment of rights by people seeking asylum and those granted status in Wales. Through its varied membership, the Coalition bears witness to and regularly supports people who live in abject poverty, experience regular discrimination, struggle to utilise valuable skills and who are disempowered by a dehumanising UK asylum system. The Coalition equally bears witness to the most inspiring examples of human kindness, tenacity, resilience and strength – demonstrated time and time again by newcomers to Wales who have been forced to flee their homes, families and livelihoods and by individuals and established communities in Wales who reach out and offer welcome and sanctuary to those newcomers. We share a vision of Wales as a Nation of Sanctuary and will continue to play our part in ensuring this vision becomes a reality. The third sector has a wealth of expertise to offer here, recognised by the Welsh Government's choice to award funding for the Asylum Rights Programme to a consortium of seven third sector partners. However, Coalition members struggle with short-term and insufficient funding, leading to a lack of continuity rather than opportunities to build on successful work and continuously improve the welcome we can offer in Wales.

2.2 The Welsh Refugee Coalition welcomes the commitment and leadership from Welsh Government to Wales becoming a Nation of Sanctuary and applauds the collaboration and engagement that characterised the pre-consultation phase of the plan's development. This represents an exemplary model for the 5 ways of working under the Wellbeing of Future Generations (Wales) Act 2015 that we look forward to being carried through into its delivery and assessment of impact.

2.3 We have some detailed commentary to contribute, as outlined in the pages that follow, though our key areas of interest and concern are:

- I. **Budget:** there is no information in the plan about how the actions will be financed. We would like reassurance that specific budgets have been secured from various Welsh

Government departments to deliver all the commitments contained within the plan and, where they are included, on the expected timescales.

- II. **Monitoring & Evaluation:** there are many commitments which don't explain 'how' actions will be carried out. We would like to see more precise actions, supported by a monitoring and evaluation framework with clear performance indicators, success measures, lead responsibilities, review dates and review body. Given Carwyn Jones' commitment to make Welsh Government a feminist government¹, we would expect any framework to explore and capture the differential experiences of men and women. Such a framework would allow progress to be measured and to ensure that actions assigned to other parts of Welsh Government are tracked (e.g. the commitment on page 18 to revise anti-bullying guidance in 2018 – this is welcome, though at this stage, we have no way of knowing how it will support the needs of refugee and asylum-seeking children as the action states). Such a framework would also facilitate the participation of sanctuary seekers, as well as frontline and grassroots organisations, in assessments on progress. Participation in monitoring activity could be themed so that relevant organisations would have the opportunity to give detailed feedback on areas of expertise.
- III. **Timescales:** we would like to see all actions assigned timescales (e.g. For how long it is envisaged that move-on support and the WARD scheme will be funded? When will the Age Assessment Toolkit be reviewed and republished? When will VAWDASV 'Ask and Act' training be rolled out to front-line professionals?). Welsh Government's Together for Mental Health Delivery Plan 2016-19² provides an exemplary model of a plan with detailed actions, performance measures and timeframes. Without timescales, can we assume that this means until end of the current Assembly term, in line with the Introduction that states, '*This draft plan seeks to set Welsh Government policy direction relating to these communities until the end of this Assembly term*'?
- I. **Reporting arrangements:** we would like to see a clear framework for reporting on this plan (e.g. through Welsh Government's Operation's Board, via an annual report, through an annual debate in Plenary).

2.4 Beyond these headlines, we have addressed each question as asked in the consultation, as well as provided feedback on each section of the delivery plan.

3. Do you agree with the priority actions identified in the Ministerial foreword? Please explain the reasons for your answer.

3.1 The Welsh Refugee Coalition is pleased that the Ministerial Forward offers some clarity on those areas on which Welsh Government would like to see action by the UK Government and welcomes the commitment to work with them on these issues. We would welcome clarity on how Welsh Government envisages doing this and would value the opportunity for the Coalition to play an active and supporting role in any such work.

3.2 We are also pleased that Welsh Government's previous commitment to the approach of integration beginning on day 1 of arrival to Wales has been brought forward and identified as a key principle in this plan. We support the focus on integration from day one and underline the key role of providing and funding quality ESOL, education, training and employment readiness services in

¹ <https://www.bbc.co.uk/news/uk-wales-politics-44196315>,
https://www.buzzfeed.com/hannahalothman/this-politician-wants-to-make-wales-the-most-feminist?utm_term=.kdeVYgQ9D#.cqDRDLOX1

² <https://gov.wales/docs/dhss/publications/161010deliveryen.pdf>

order to achieve this and to maximise the potential for new refugees (sections 7, especially 7.9-11 and 14.1). We also welcome the commitment to enhance support for those made destitute and for the most vulnerable (section 5.14-15). Both these need to be reflected in robust and specific actions.

3.3 In the introduction, we are pleased to see the delineation of Welsh and UK Government responsibilities, as well as the specific areas of concern that Welsh Government have with UK Government policy. We support Welsh Government's leadership and encouragement for other sectors to work towards Wales becoming a true Nation of Sanctuary, as well as the important commitment to a person-centred approach and the situating of the plan within a rights-based framework. We believe that this approach will achieve better outcomes for people, communities and the country as a whole and would urge the Welsh Government to share the benefits of such an approach with UK Government to counter their hostile environment policies.

3.4 In addition to the priorities identified in the Ministerial Forward, we would like to see greater prominence given to the powerful voices of asylum seeking and refugees. We feel it is also important that receiving communities, through community groups and frontline workers in a range of fields, have access to positive communications/awareness-raising sessions so that refugees and asylum seekers are welcomed and understood. Ensuring this plan is delivered on a foundation of public support is crucial to its success in contributing to Wales being a Nation of Sanctuary and getting the communications right is important.

3.5 From a Children and Young People's perspective (including UASC), access to Mental Health Services and Counselling support is definitely the top priority for many. After this, early access to suitable education and accommodation are the principal concerns of young people. Provision of advocacy is also important, with more resources needed for vulnerable young people who are not with family, both those who are age disputed and those who are over 18 and vulnerable for a variety of reasons.

4. Do you agree with the actions within the Welsh Government's 'Nation of Sanctuary: Refugee and Asylum Seeker Plan'? Please explain the reasons for your answer.

4.1 The Coalition broadly agrees with the actions in the draft plan and offers the following general feedback.

- I. ***There are a number of actions where links to existing rights and entitlements or local work supporting access are not made explicit, which is a missed opportunity. We suggest they be made explicit.*** For example, the Business Wales support mentioned already exists and it needs to be properly marketed to refugees as part of the Plan; the Healthy Child Wales Programme already exists and therefore the plan should ensure people seeking asylum and refugees *do* access vaccinations, rather than *can* access these (page 13); refugees are already eligible for student support funding through Student Finance Wales and so the action should be about making sure they are aware and the application process is accessible and support provided meets their needs.
- II. ***There are places where clarity could be offered on Welsh Government's role in ensuring consistency of provision, so that it is not a lottery for asylum seekers or refugees, where access to services and support is dependent upon the location they find themselves dispersed or sent to.*** For example:
 - a) Welsh Government should incorporate learning from local work supporting access to services. As an example, there is local funding available in Swansea for a children and young people's counselling service and this needs to be joined up with Welsh Government's action on counselling for children and young people

- b) Health of Homeless and Vulnerable Groups (HHAAGAP) meetings work very well in Swansea and these should be promoted across Wales.
- c) The 'Welcome to Swansea' programme has demonstrated how to run a successful mentoring service and what that success can mean for its participants - Welsh Government should commit to expanding that to all dispersal areas.

4.2 In addition to these general comments, we have commentary on each section of the draft plan.

5. Prosperous & Secure

5.1 On ensuring refugees are supported to transition from asylum accommodation to sustainable accommodation, the Coalition would like to see Welsh Government's funding for the Refugee Well Housing project reviewed to ensure funding is sufficient to meet demand and to ensure that this funding is available on a sustainable basis.

5.2 We welcome action to ensure the guidance underpinning local Homelessness Prevention Strategies take account of the vulnerabilities of new refugees and we seek reassurances that should this guidance lead to an identified need for increased provision, that the additional costs will be met.

5.3 We would like to see the commitment to explore opportunities to reduce refugee homelessness strengthened to a commitment to reduce refugee homelessness. The Coalition has insights and experience to offer on how this can be achieved, such as the partnership between Welsh Refugee Council's move-on programme and the YMCA in Cardiff or the shared house model being developed by Share Tawe in Swansea. We know that local authorities are utilising money available to them to prevent homelessness and that it is used to good effect when invested in bonds, agency fees and rent in advance for refugees facilitating access to the private rented sector.

5.4 We welcome the very positive and practical action of work with Rent Smart Wales, although on Right to Rent checks, given the Joint Council for the Welfare of Immigrants (JCWI) research³ into the discriminatory impacts of these checks, the Coalition would like Welsh Government to liaise with UK Government to seek to influence the roll out of this provision in Wales. The Coalition remains concerned that the 'Right-to-rent' checks in Wales will lead to an increase in discrimination, homelessness presentations and the number of No Recourse to Public Funds (NRPF) cases presented to social services.

5.5 We recommend that Welsh Government develop and evaluate a pilot scheme in Wales, before legislation is brought in to extend the Right to Rent scheme, in order to assess how we can prevent discrimination from occurring. The impact of potential new legislation should also be monitored so that mitigating action can take place should negative consequences be identified. There is also a clear need to work with private landlords to raise awareness of different types of migration status to mitigate any impacts of Right to Rent Checks in Wales. We would also strongly recommend that there is a way for tenants to be able to report private landlords acting in a discriminatory way, perhaps through Rent Smart Wales.

5.6 On the promotion of good quality asylum accommodation provided by the UK Government, the Coalition requests that Welsh Government do everything it can to ensure housing standards are equal for everyone living in Wales, if possible through widening the remit of the Welsh Housing Quality Standard. This will require greater resource for local authorities to inspect asylum accommodation properties on a more regular basis – the right to inspect properties with minimal notice will achieve little if local authorities don't have the resources to do so. Welsh Government

³ <http://www.jcwi.org.uk/news-and-policy/passport-please>

could also take a role in disseminating clear information about asylum seekers' rights to fit and proper housing, including how to complain.

5.7 On current accommodation and forthcoming COMPASS contracts, the Coalition would like Welsh Government to compel accommodation providers to attend the Welsh Government funded Asylum Rights Programme advocacy forums where accommodation is identified as an issue by participants. Inconsistent engagement so far has had a detrimental impact on the effectiveness of those forums held in Swansea. We request Welsh Government influence UK Government to include a requirement within the new contract for the accommodation provider to engage with and act on the voices of tenants on a regular basis.

5.8 On supporting the employability of refugees and working with Business Wales to support refugees to establish their own businesses, it would be helpful for the delivery plan to be more explicit about what support and links are available. For example, the delivery plan should name the 'Welsh Government funded employment schemes' which will promote their services directly to refugees during 2018 (page 8). In addition, the Coalition would like clarity on what training named employment schemes (including JCP, Communities for Work & Business Wales) and agencies such as the DWP could receive to help them better support refugees into work and to better understand the specific challenges refugees face in gaining employment. It would also be helpful to acknowledge how realistic (or not) it is for refugees to work for the Welsh Government, given Civil Service nationality rules, and add some of this detail to the Plan, even if that is just a weblink to a clear explanation of the rules. Welsh Government also has a role to play in raising awareness among employers on the fact that refugees have the right to work as some employers perceive this as a risk and of making the business case for employing refugees.

5.9 Many refugees and asylum seekers arrive with a wealth of skills that should enable them to get a job. The delivery plan commits to ensure the Credit and Qualifications Framework for Wales is promoted to refugees and asylum seekers and service providers during 2018. Recognizing prior learning is a chronic problem across a broad range of professional academic and vocational skills and trades, so this will need a comprehensive communications strategy to fully explain how the framework can be used. Achieving this by 2018 appears somewhat optimistic and 'promoting' the framework doesn't go far enough – user-friendly resources and awareness sessions are required to ensure it is used as widely as possible by refugees and asylum seekers and organizations supporting them. Other migrants would also benefit from this, supporting them to contribute to Wales' economy. Additionally, the relationship between the Credit and Qualifications Framework for Wales and the support offered by NARIC needs to be clarified.

5.10 Although it is encouraging to see there is a refugee case study in Welsh Government's Employability Plan, there is no other detail on specialist employment support for refugees. The UNHCR/OECD 10-point plan for engaging with employers on the hiring of refugees has some excellent recommendations that Welsh Government and other stakeholders could take forward⁴. Welsh Government also have levers at their disposal to encourage employers to recruit refugee talent, for example, through procurement and grant giving mechanisms such as the Economic Contract and Community Benefits Toolkit or through its work with Anchor Companies – the Coalition would like to see these links made more explicit.

5.11 The Coalition welcomes a commitment to ensure that refugee women are encouraged to consider entrepreneurship opportunities. However, evidence from Oxfam Cymru's Sanctuary in Wales⁵ project indicated that the Business Wales service was inaccessible to refugee women

⁴ <http://www.unhcr.org/5adde9904>

⁵ <https://policy-practice.oxfam.org.uk/publications/final-evaluation-sanctuary-in-wales-project-581107>

involved in the project. The generic advice and courses available on the website and on the phone were not adequate in providing the holistic support which refugees often require to get a sound grounding in the UK economy, local markets and opportunities as well as HMRC and employment law requirements which will likely be very different to the set-up in countries of origin. Additionally, Refugee women are particularly disadvantaged in terms of finding suitable employment for a variety of reasons including social and cultural barriers but also due to caring responsibilities and a lack of childcare. As such it is essential that Welsh Government works with partners to ensure gender-disaggregated monitoring, evaluation and assessment of all refugees in refugee employment programmes recognising that refugee women's experiences and needs are qualitatively different from those of men.

5.12 On the *Community Based Entrepreneurship Scheme*, the Coalition would like to see more detail on how incentives and support for refugee business owners to act as peer mentors.

5.13 On promoting financial inclusion for refugees and asylum seekers to avoid destitution, reduce or mitigate the impacts of poverty and improve living conditions for those on low incomes, it would be helpful if the described actions were specific about who Welsh Government was targeting to raise awareness of the appropriate strategies and plans and available support and how this will happen.

5.14 Beyond this general point, we welcome the focus on action to alleviate destitution, which can pose critical welfare and human rights issues for those seeking sanctuary – not least homelessness, poverty, mental and physical ill health. It is vital that Welsh Government support local authorities to be informed and equipped to identify and provide for the most vulnerable, in line with the Social Services and Wellbeing (Wales) Act 2014.

5.15 In addition, the Coalition urge Welsh Government to invest in a *Crisis Fund* or in capacity building Third Sector infrastructure to respond to destitution (as per Welsh Refugee Coalition's June 2018 proposal and ongoing discussions).

Key areas that urgently require investment that would make a significant impact are:

- I. Training in the relevant legal, risk assessment and safeguarding processes and skills so that the voluntary sector can advocate and progress cases more effectively and ensure that the public-sector acts in line with its statutory obligations
- II. Capacity building in provision of temporary shelter to allow destitute asylum seekers to progress their claims and reapply for public support – involving support for the training and recruitment of volunteers, identification of new housing options and developing a whole-system approach so that a range of voluntary and public agencies are equipped to address this issue
- III. Targeted support for para-legal advice on applications for extension of leave, fresh claims and section 4 applications, such as through Asylum Justice, so that cases are progressed promptly, and periods of destitution avoided or minimised.

5.16 In addition to investing in the above areas, the Coalition also urge Welsh Government, in its delivery plan to:

- I. Acknowledge that asylum support rates mean that individuals and families supported by the Home Office are living in poverty
- II. Assess the potential impacts the Immigration Act's 2014 & 2016, as well as forthcoming Immigration legislation will have on homelessness in Wales, present findings to the Home Office and seek funding to cover any costs arising in Wales because of UK legislation.

- III. Ensure revised health guidance acknowledges and fully addresses the needs of destitute asylum seeking, refugee and NRPF populations.
- IV. Use Welsh Government's position within the UK's devolved settlement to advocate on behalf of people seeking asylum and those with refugee status living in Wales, to highlight the challenges being faced, and to call for reforms to UK immigration and asylum policy. Changes to UK policy and practice that would have major impacts on poverty reduction in Wales include:
 - a) Regarding asylum support: introduce a timeframe for decisions on Section 4 support, apply existing policy and guidance consistently and continue support until decisions on appeals are made.
 - b) Make legal aid available for asylum support appeals.
 - c) Permission to work be granted to any person seeking asylum that has been waiting for longer than six months - the Home Office's standard target for asylum decisions – and that permission should no longer be restricted to jobs on the Government's Shortage Occupation List.
 - d) Home Office to consider destitution when making decisions on applying conditions to status - rather than assigning NRPF conditions and subsequently removing them.
 - e) An extension of the 'move on' period for new refugees to 56 days - reflecting the time it takes for refugees to access accommodation and financial support.
 - f) The rate of asylum support to be raised from its current level of 50% of job seekers allowance to at least 70%.
 - g) Ensure that local authorities, particularly social and homelessness services, in Wales are fairly and fully financially resourced to support people with NRPF (recognising their role as key stakeholders in a successful compliant migration environment).

5.17 The commitment to monitor the effect of recent welfare reforms, including the benefit cap and expansion of the Universal Credit 'full' service during 2018 to identify barriers for refugees is welcome, though the Coalition is disappointed that there is no commitment to tackle those barriers once they have been identified, a significant shortcoming which the Coalition would like to see addressed. The Coalition requests that that Welsh Government's commitment on this action be strengthened to 'Welsh Government commit to monitoring and seeking to mitigate any adverse effects of welfare reforms including the benefit cap and expansion of the Universal Credit 'full' service during 2018 to identify barriers for refugees'.

5.18 Underneath the action *work towards preventing refugees or asylum seekers becoming human trafficking or modern slavery victims*, the monitoring and reporting risks of trafficking and improving awareness and training in this area is beneficial for all asylum seekers and refugees, including children and young people. The Coalition strongly feels that this needs to include people with the NRPF condition and that, as in the last bullet point above, local authorities need to be supported financially to work with people with NRPF. This work includes:

- I. Identifying a lead officer with sufficient authority and influence to actively participate in the Wales NRPF network.
- II. Improving awareness, as well as up-to-date technical and practical knowledge within any local authority of destitution amongst asylum seeking, refugee and NRPF populations, to ensure support entitlements amongst these populations are fully understood and acted upon.
- III. Ensuring Social Services departments and homelessness services that respond to referrals, undertake assessments of vulnerability and risk and offer required support in a timely manner in line with Housing (Wales) Act 2014 and Social Services and Well-being Act 2014 requirements.
- IV. Developing a common recording system across local authority departments to capture consistent data across time and locations (e.g. on numbers of people supported, needs of

those supported, legislation used to support, cost and length of support and case resolutions).

- V. Developing a system for capturing the costs of supporting NRPf cases.
- VI. Ensuring that asylum seeking, refugee and NRPf populations are acknowledged and their needs addressed at local / regional homelessness local authority fora.
- VII. Ensuring homelessness provision within any local authority is culturally and gender appropriate and safe.
- VIII. Working in partnership with the health and voluntary sectors to tackle destitution.
- IX. Considering becoming a beacon authority of NRPf good practice and leadership in Wales.

5.19 In addition, Welsh Government's Code of Practice for Ethical Employment in Supply Chains should be mentioned in this section of the plan as a positive step public bodies, private businesses and third sector organisations can take to help eradicate unethical and unlawful employment practices. This Code of Practice should also form part of Welsh Government's Economic Contract. It should also be recognised that early intervention in the form of ESOL, education & skills, job readiness, confidence building, employment rights education and employment support are all key measures to help with integration and prevent refugees and asylum seekers becoming victims of human trafficking or modern-day slavery.

6. Healthy & Active

6.1 *On ensuring barriers to healthcare for refugees and asylum seekers are reduced*, the Coalition is pleased to see that free health care will be maintained in Wales, including for people with NRPf and we welcome the consultation on health policy guidance. We urge Welsh Government to take full account of the HEAR research on health access by refugees and asylum seekers currently being led by Public Health Wales and Swansea University and to ensure that this research informs the forthcoming Practitioner Policy Guidance.

6.2 Whilst asylum seekers and refugees are currently supported at initial accommodation and at point of dispersal to access primary healthcare and health screening, those arriving under family reunification would not necessarily receive this structured support. We urge Welsh Government to review the support and access to services for families arriving under family reunification and develop work with agencies to ensure that they receive equality of access and support.

6.3 We also urge Welsh Government to ensure that the needs of asylum seekers and refugees are reflected in the new Isolation and Loneliness Strategy due in 2019.

6.4 The Coalition would like the delivery plan to provide clarity on the 'awareness training' mentioned in this section. The Coalition suggests this needs to ensure that the experiences of refugees and asylum seekers are sought and reflect improvements in this area.

6.5 In response to *creating the conditions for every child to have a healthy start in life*, the Coalition notes that there is likely to be a whole tranche of work needed under adverse childhood experiences (see ELGC evidence from psychologist in relation to UASC, but also for accompanied children, including those arriving through family reunification⁶). These experiences could have significant implications for mental health in later life and the Coalition would like to see a more robust commitment from Welsh Government than the 'consider the circumstances of refugee and asylum seeker children in relation to work on ACEs' currently detailed in the plan.

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<http://senedd.assembly.wales/documents/s500003171/RAS%2003%20-%20The%20British%20Psychological%20Society%20BPS.pdf>

6.6 The coalition strongly supports the recommendations of the recent Children's Committee report⁷ on the step change needed in emotional and mental health support for children and young people in Wales. Although containing nothing specific to refugee and asylum-seeking children, we support the principles of early intervention and prevention and urge Welsh Government to consider refugee and asylum seeker children in its response.

6.7 *Re supporting refugee and asylum seeker participation in sport and physical activity*, this is welcomed by the Coalition, though the action is sparse on detail. The costs of participation need to be acknowledged and addressed and the action could benefit from having a lead organization identified. An option could be to work with local authorities to ensure facilities meet the needs of deprived populations, such as free outdoor facilities, supporting Park Lives programmes or widening access and information about Passport to Leisure.

7. Ambitious & Learning

7.1 As highlighted in the introduction, we cannot emphasise enough the critical role of education and training from day one as cutting across many areas of this plan and as vital for integration and success. This means that funding is vital for quality ESOL, education, training and employment readiness services. Appropriate access to statutory (pre-16) services is of course important, though it is especially vital that barriers are removed to young people and adults accessing support.

7.2 *On ensuring access to independent counselling services for refugee and asylum-seeking children*, as already highlighted, for children and young people (including UASC), access to mental health and counselling support is the top priority for many. Based on recent experience by Tros Gynnal Plant, investment in interpretation is critical to the success of counselling and therefore the Coalition would like to see commitments to this reflected in the delivery plan. Also, without interpretation, many children and young people simply will not benefit from investment in counselling provision.

7.3 By way of background, Tros Gynnal Plant report that UASCs and the other vulnerable children and young people they work with between the ages of 11 and 25 often report low mood, anxiety or depression and in a few cases more complex mental health conditions as well as what's likely to be PTSD. Slow outcomes in immigration claims impacts negatively on mental health, as do disputed age assessments which conclude that a person is over 18 and result in a change of accommodation to a mixed household with adults. Currently, at least 3 young people waiting for an age assessment in Cardiff are in initial accommodation sharing rooms and say they feel unsafe and distressed. Many children and young people are bereaved and traumatized and report physical pains and headaches which appear to relate to their feeling of distress. On occasion, children and young people have reported that they have lost important items such as Arc cards, wallets or backpacks and attribute these losses to their 'head being confused' and their 'thoughts being jumbled'. There can be improvements once children and young people engage in appropriate support and in participatory activity, though for many their anxious or depressed mood returns regularly.

7.4 GPs need to be better equipped to assess the mental health needs of these children and young people. Some GPs appear unwilling to refer to CAMHS and unfortunately, even if a referral is made, individuals often face a lengthy wait for assessment and it seems there are no specific provisions for the kind of support needed. UASC are affected by local authority budgets allowing for less money to be allocated to therapy and instead only free locally sourced courses or counselling

⁷ <http://www.assembly.wales/laid%20documents/cr-ld11522/cr-ld11522-e.pdf>

accessed via schools or third sector providers (e.g. new Pathways, Mind or anxiety courses on skills-based programmes), which do not meet the needs of these children and young people.

7.5 Another barrier to accessing suitable therapy which needs acknowledging and addressing is the cost and availability of appropriate interpreters in cases where a child or young person doesn't possess sufficient English or Welsh to manage without it. Access to specialist mental health services need to be more readily available and accessible. Regular mental health checks should also be available as PTSD can take a period of time to arise.

7.6 Complementary activities such as resilience classes, yoga, mindfulness and sport play a role in good mental health, as do mentoring schemes. These should be considered important, though are no substitute for high quality, bespoke mental health support.

7.7 *On supporting and challenging Local Authorities and regional education consortia on actions they are taking directly, and through support to schools, to improve educational outcomes for all learners*, the Coalition is concerned about the threat to the MEAG (Minority Ethnic Achievement Grant) funding to local authorities. The foundation of integration for sanctuary seeking families is access to schooling for their children. As an example, the Ethnic Minority Achievement Unit (EMAU) at Swansea Council, funded by MEAG, is invaluable in providing support for learners and their families to achieve their potential at school, whether that be through language provision, specialised classes or advice and guidance. Swansea Council has already announced a consultation into significantly reducing the EMAU service as a direct result of the removal of MEAG funding and moving to a school-led approach. This raises alarm bells as the support available to ethnic minority learners will then depend on the commitment of each school to this issue and we know there are discrepancies amongst schools about how resources are prioritised.

7.8 *On exploring ways to raise take-up rates of the Foundation Phase early education entitlement by refugee and asylum-seeking families*, to add weight to the actions around Early Years provision, Welsh Government should commit to increase take up rates of the Foundation Phase early education entitlement by asylum seeker and refugee families, rather than encourage increased take-up rates. The Coalition would also like to see detail on how this could be achieved.

7.9 On the promotion of essential skills for refugees and asylum seekers to improve employability prospects, social cohesion and school attainment levels for children, the Coalition is disappointed that there is no additional funding for ESOL, though understand that Welsh Government has submitted a bid to the Home Office AMIF fund with a view to expanding ESOL and employability provision, to roll out the REACH programme beyond Cardiff to other dispersal areas in Wales. We welcome this bid and hope it is successful. Should it be successful we would urge an evaluation of the REACH model before either the ESOL policy for Wales is updated or prior to further roll out. Any such evaluation should include:

- a gender and age analysis of need and uptake
- the need for culturally appropriate provision and childcare facilities
- waiting times at different times of the year
- input from frontline agencies such as Oasis, Welsh Refugee Council and ACE
- the role of Adult Learning Wales and its ability to deliver accredited classes in communities with little or no ESOL infrastructure

7.10 Additionally, the existing work of Adult Learning Wales collaboratively with Cardiff and Vale College to develop flexible ESOL provision as part of the REACH project is referenced, though the Coalition would like to see a commitment to this ongoing collaboration.

7.11 Under the heading *promote awareness of apprenticeship opportunities with refugees to enable increased employment and learning opportunities*, the Coalition urges Welsh Government to consider ESOL plus, where individuals can study ESOL alongside a trade such as catering or plumbing. There are opportunities for this FE colleges dotted around Wales and examples to explore are formal courses available in Cardiff and emerging schemes such as those offered as Coleg y Cymoedd which is delivering a joint ESOL & carpentry course to SVPRS participants in Rhonda Cynon Taff.

7.12 On *increasing opportunities for refugees and asylum seekers to access further and higher education*, a key concern is the lack of teeth relating to this ambition. This is a crucial area of action that could truly support people seeking sanctuary to learn new skills, integrate and contribute to the Welsh economy. Resolving and widening access to higher and further education for asylum seeking children and young people is critical. Given the time the asylum process can take, which is years in some cases, young people moving through the asylum process should not have access to higher education barred to them. Even if their long-term future turns out not to be in Wales they should have a right to study here and appropriate financial help to sustain this. As well as personal benefits to themselves in terms of reaching their full potential and leading a prosperous and fulfilling life their contribution to University life for others in terms of diversity, equality and culture will be positive.

7.13 It is of concern that there appears to be no key organization to lead on this action. Due to the recent (January 2018) Section 10 changes on restrictions on the right to study, there needs to be a section of Welsh Government to keep a watching brief on Home Office policy, to ensure Welsh Government is fully able to exercise its devolved responsibilities. The Coalition would like to see Welsh Government reiterate its support for asylum seeking young people with the following statement included in the plan: "It is Welsh Government's policy that all asylum seekers should have the right to study in Wales as access to education plays a fundamental role in community cohesion and national prosperity" and for this to be supported with a clear lead with responsibility for making it a reality.

7.14 The Coalition welcomes the commitment to *explore possible changes to the Education Maintenance Allowance and Financial Contingency Fund to enable asylum seekers to be eligible from the September 2019 term, though we urge haste on this to enable students to benefit from this from September 2018.* Whenever introduced, this change will overcome many of the barriers to Further Education experienced by asylum seekers. University admissions teams should work with Further Education institutions to provide information, advice and guidance on the application process and financial support available to go to university.

7.15 On Higher Education, feedback from universities at the Sanctuary in Higher Education Working Group, currently coordinated by DPIA, is that this requires an approach adopted by HEFCW, similar to how the Buttle Quality Mark resulted in a sector-wide response for care leavers. This needs to include funding for scholarships or bursaries to enable asylum seekers in particular, to overcome the financial barriers to higher education. However, there is a wide range of things universities can do to be places of sanctuary for refugees and asylum seekers and these should all be considered by Welsh Government and HEFCW.

7.16 On the commitment to *work with the Higher Education Funding Council for Wales (HEFCW), Universities and their partners to audit and publish practice on supporting refugees and asylum seekers, it would be good to see a commitment to highlighting to universities that a major barrier to entering university is English / Welsh language competency.* Many forced migrants meet the academic requirements for entering university and, admirably, receive the same support as home students from the start point of a degree award. However, many individuals don't meet linguistic requirements, and this is a major barrier to study. At present, there is no financial support to

overcome this barrier. ALL universities in Wales run comprehensive pre-degree language programmes for international students from wealthy countries (e.g. Saudi, China, UAE) and thus, the frameworks are in place, but the high costs of entry onto these pre-university language courses prevent forced migrants from access. Schemes such as the University of Wales refugee sanctuary scheme⁸ should be promoted to other universities. There is attraction to universities in this scheme also, since they can increase their student numbers without changing any existing support framework.

7.17 On education generally, support for global citizenship education is a useful way of making schools more welcoming to asylum-seeking and refugee children and to help mitigate and minimise instances of discrimination/racism on the part of children, teachers and parents. There are also specific resources available like the Schools of Sanctuary⁹ resource that could be useful for schools to improve awareness and understanding of refugee issues amongst future generations, to embed welcoming and inclusive practices in schools and to promote community cohesion (especially in non-dispersal areas).

7.18 The development of the new curriculum in Wales offers an excellent opportunity to ensure that all children and young people are ethical, informed citizens who ‘respect the needs and rights of others, as members of a diverse society’ and are ‘healthy, confident individuals who ‘form positive relationships based on trust and mutual respect’.

7.19 *On supporting unaccompanied refugee and asylum-seeking children to ensure they have access to the advice and advocacy they need, the Coalition urges Welsh Government to cement the ‘Guardianship’ service in specific deadlines to ensure it progresses.* This is not a new commitment, though it has been slow to develop.

7.20 *On supporting unaccompanied refugee and asylum-seeking children to ensure they have access to the advice and advocacy they need, the Coalition urges Welsh Government to acknowledge that ARP funded provision is insufficient to meet required needs.* Tros Gynnal Plant’s ARP Advocacy Caseworker is working with the targeted number of young people, though anticipates that there is need in parts of Wales from which referrals are not currently received and referrals to assist with further education issues are expected as awareness around these issues increase. The number of age disputed cases continue to increase and forms the core of the advocate’s current caseload. Tros Gynnal Plant have concerns that in Cardiff, young people are not being given the benefit of the doubt in terms of age in age assessments and that they are in initial accommodation, in some cases for weeks, while waiting to be age assessed. Having sufficient legal advice to deal with age disputed cases has been a challenge with only one firm in Wales being identified by Tros Gynnal Plant as being suitable and willing to take these cases on. We request Welsh Government consider capacity and adequate resourcing when the ARP is reviewed.

7.21 We ask Welsh Government to ensure that all work to *gather the views and opinions of children and young people* is carried out in line with the National Participation Standards¹⁰. Further, any consultation with children and young people should adhere to National Participation Standards. Tros Gynnal Plant have in the past used child friendly consultation documents interactively with children and young people which have proved popular and helpful. Regarding the assessment indicating that face-to-face discussions are considered preferable due to low English language proficiency and lack of trust in Government institutions, Tros Gynnal Plant agree that is the case,

⁸ <https://www.southwales.ac.uk/study/fees-and-funding/undergraduate/undergraduate-home/usw-refugee-sanctuary-scheme/>

⁹ <https://schools.cityofsanctuary.org/resources/>

¹⁰ http://www.youngwales.wales/images/ParticipationStandards_Poster_9.pdf

with many UASCs and many of the other vulnerable young asylum seekers they see. There are however, other asylum seeking and refugee children who have good English and can be accessed to take part in this consultation. Tros Gynnal Plant suggest a few sessions with the same children and young people, especially those with little or no previous experience of participatory engagement. Children and young people often work better with people they know and trust, especially when sensitive issues are involved. Introducing the concepts of participation and setting the scene so that the consultation makes sense takes some time before getting onto the subject matter of the consultation itself pays dividends. Time should be allowed for children and young people to ask questions and whenever possible set their own ground rules on how participation sessions run. Participatory methods used should also have regard to age and understanding.

7.22 *On supporting local authorities to ensure unaccompanied refugee and asylum-seeking children can be adequately looked after*, there is a clear need for appropriate skills training for professionals who are responsible for the care of and charged with making 'best interest' decisions for UASC. Welsh Government funded training for social workers and foster carers on age assessments is a positive step and will be welcomed by many social workers, as well as by the third sector. Other training around cultural awareness, issues experienced by UASC, immigration processes and the role and responsibilities of social workers in this area would be beneficial too. Approximately once a month, Tros Gynnal Plant experience social work teams and foster carers who are working with people seeking asylum for the first time or where they have had few previous cases. In some local authorities where they have had more experience with this cohort, but no specific training, there is an interest in training by both local authorities and by foster carers. In the past, some local authorities had specialist teams working with UASC, though now the practice of allocating children and young people to whichever social worker has capacity at the time. Some UASCs find it difficult and confusing to have a change of social worker within a couple of months of their initial involvement with children's services, especially if they have got on well with their Duty & Assessment Social Worker. Several UASC taking part in a recent Tros Gynnal Plant consultation workshop on Welsh Government's Delivery Plan expressed confusion about who does what and what a LAC Review is. They have no recollection of someone explaining what an advocate does or being offered one. The Coalition welcome the forthcoming Welsh Government factsheets being prepared for such young people (translated into all required languages) and professionals as an aid to helping life easier for UASC. The possibility of having a specialist UASC lead social worker within each local authority is something the Coalition would like to see explored.

7.23 The Coalition welcomes the commissioning of a re-draft of the Age Assessment toolkit to ensure it is fit-for-purpose and the involvement of third sector agencies in its review.

7.24 In relation to UASC, it is positive that *suitable accommodation is to be promoted and that looking for foster carers from refugee backgrounds be encouraged*. The Coalition would also like to see a commitment to working with the All Wales Heads of Children's Services and the National Fostering Framework Strategic Steering Group to explore ways in which fostering provision can be improved and responsive to the needs of asylum seeking children and young people. Listening to what children and young people say about their accommodation is the first step. Tros Gynnal Plant highlight that some foster placements do not provide the right nurturing environment for UASC and that children and young people are wary about making any type of complaint. They are generally respectful of all those involved in their care, though when trusted relationships are built, several children and young people have reported being cold and explained the heating only goes on in accommodation when visitors are coming. Others have stomach ache from eating western food and some report not being supported to visit a religious place of their choice or not being supported to visit friends or attend events with people from their communities. An additional issue is that a lack of sufficient suitable foster care placements results in children and young people being moved into

semi-independent living arrangements before they are ready. Although children and young people can find the constraints of foster care a challenge after the independence they have had on their journey to Wales, they lose out on the opportunity of being part of a nurturing household if foster placements are not available or appropriate. Communication around cultural issues which may be easily resolved can be one of a few issues which affect how well foster placements work.

8. United & Connected

8.1 *On the provision of cohesion support around the widening of dispersal areas and the resettlement of refugees and fostering good relations between refugees and asylum seekers and wider society*, the Coalition notes the absence of reference to Welsh Government's Community Cohesion plan. We seek assurances that the ELGC inquiry recommendations relating to this plan to i) include a communications strategy that emphasises the benefits of immigration to Welsh society and dispels myths and inaccuracies about refugees and asylum seekers and ii) a Wales wide publicity campaign like the one undertaken in Scotland are included in this delivery plan. Welsh Government committed to updating the Community Cohesion plan by summer 2017 and so the Coalition is disappointed that this has not yet been achieved. In a letter to the First Minister¹¹ the ELGC Committee recommended that Welsh Government 'update the Community Cohesion Plan before summer 2018 to take account of recent rises in hate crime and new challenges to community cohesion in Wales' post Brexit.

8.2 We also urge Welsh Government to clarify the existence and role of Welsh Government's Asylum Seeker & Refugee Communications Group in the delivery plan. The Coalition urges Welsh Government to take a lead on positive communications around migration, as well as continuing its role of facilitating coordination between communications campaigns led by the third sector. The Coalition also urges asylum seeker and refugee participation in Welsh Government's Communication's Group.

8.3 *On the commitment to provide coordination and leadership in relation to the resettlement and integration of refugees and asylum seekers in Wales*, the Coalition would like to see reference to a workplan for both the Taskforce and Operation's Board, as well as accompanying commitments to monitor & evaluate these workplans.

8.4 *On the promotion and understanding of Welsh culture and heritage to refugees and asylum seekers*, the Coalition would like to see cultural exchange and learning as a 2-way process. Native and relatively new populations have a lot to share and learn from each other – we'd like to see this recognised and embraced by the delivery plan.

8.5 *On endeavour to provide equal access to the internet for refugees and asylum seekers in Wales*, Tros Gynnal Plant highlight that a lack of laptops or Wi-Fi in semi-independent living accommodation is an issue for UASC, as well as other children and young people. The lack of these provisions impedes children and young people progressing in education and being able to do homework. Most teenagers in Wales have access to these facilities in their own homes. Accessing a local library or alternative public building is not always easy for a variety of reasons. The Coalition requests that provision be made for UASC to have laptop and Wi-Fi in semi-independent living spaces.

8.6 The Coalition is aware that some local authorities are beginning to look at developing exit strategies for their SRVPS. We are mindful that many local authorities who have welcomed families

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<http://senedd.assembly.wales/documents/s73986/Letter%20from%20the%20Chair%20of%20the%20External%20Affairs%20and%20Additional%20Legislation%20Committee%205%20April%202018.pdf#>

are non-dispersal areas, which is a fact we commend and welcome, however this also means that they lack many of the support structures that exist within dispersal areas available to the families once SRVPS support ends. The Coalition wonders whether Welsh Government has a role in supporting local authorities to develop effective exit strategies for SVPRS families. The Coalition would like to see Welsh Government work with local authorities to ensure that effective strategies are put in place, impact is evaluated, and good practice shared. We would like to see Welsh Government continuing to work with stakeholders across Wales, so that we play a full role in refugee resettlement schemes such as the SVPRS as part of a commitment to global responsibility.

9. We want to ensure that other organisations and communities across Wales take action to support the concept of Wales as a ‘Nation of Sanctuary’. How can we best work with others to achieve this?

9.1 Welsh Government’s plan should remain solely your responsibility so that Welsh Government can be held to account for the commitments within it. However, some changes that are needed cannot be delivered without support of other sectors, and this level of detail cannot be covered within Welsh Government’s plan. Other sectors should therefore be encouraged to develop ‘Nation of Sanctuary’ plans, which may be much shorter and certainly more focused, covering their areas of responsibility (e.g. especially Local Authorities, HEFCW on HE, PHW on Health, WCVA on Volunteering). These plans should be Welsh-specific but can learn from Welsh Government’s strong statements on UK policy which impacts their area of work. Welsh Government should exercise its authority wherever possible to make these sector-specific plans obligatory and implement reporting regimes so that progress can be tracked pan-Wales.

10. Our aim is that everyone will have the opportunity to reach their full potential and lead a healthy, prosperous and fulfilling life, enabling them to participate fully in their communities and contribute to the future economic success of Wales. How can we better achieve this for refugees and asylum seekers?

10.1 It must be highlighted that this aim will be difficult, if not impossible to achieve without revision of the removal of MEAG (Minority Ethnic Achievement Grant) funding to local authorities, as highlighted above. The foundation of integration for sanctuary seeking families is access to schooling for their children and support for parents and young people to enter the workforce.

10.2 Many of the elements of this delivery plan reference a mentoring scheme of one kind or another. Experience of the Welcome to Swansea project, a partnership between DPIA and Swansea City of Sanctuary, is that the management of these needs to be funded. The investment required is not large – one full-time post will support over 100 people a year and supervise up to 50 volunteers – but feedback from those involved in the current scheme has told us that without any staff support, the mentoring scheme simply cannot run. Therefore, the action to ‘encourage existing refugee entrepreneurs to act as mentors for new-start refugee businesses’ will not get off the ground without some form of funded resource.

10.3 Crucial to achieving this aim is community cohesion. There needs to be a greater, and consistent understanding amongst the community about asylum and refugee issues. This should include promotion of the Schools of Sanctuary programme, which will help prevent bullying, rather than tackling it when it does occur. The contribution of asylum seeker and refugee volunteers should be promoted by Welsh Government as part of its communications strategy. Equally important to the communications strategy is encouraging everyone to play their part and promotion of the valuable work of community groups.

10.4 We also believe that Welsh Government has a role to play in positively influencing the debate around refugees and asylum seekers at a UK level. Welsh Government’s ‘Nation of Sanctuary’ approach is in stark contrast to the UK Government hostile environment and we believe that the

humanitarian approach adopted by Wales delivers better outcomes for people, communities and the country. It is essential that the Welsh Government uses best practice from Wales to help change the debate at a UK level.

10.5 Refugees and asylum seekers must be supported not only to report Hate Crime but also to recover from it.

11. We want everyone to live in a home that meets their needs and supports a healthy, successful and prosperous life. How can we better achieve this for refugees and asylum seekers?

11.1 In addition to the details outlined in previous sections, the possibility of a mentor for young adults in dispersed accommodation is beneficial for many of the young people Tros Gynnal Plant work with, who often feel isolated and, in many cases, desperate about their situation.

12. We want the Welsh social care sector to support people to lead independent lives. How can we better achieve this for refugees and asylum seekers?

12.1 In Swansea, the Health of Homeless and Vulnerable Groups Steering Group meetings are very useful and contribute to a well-joined up approach to health and social care. These should be made obligatory in all dispersal areas and their remit to include asylum seeking, refugee and NRPF populations. This should be a clear action under ‘establish mechanisms to promote sharing of good practice for the improved health outcomes of refugee and asylum seeker communities’.

12.2 Awareness training for staff in the health and social care sectors on the rights and needs of people seeking asylum people, refugees and people with NRPF is vital to ensure they approach people sensitively and with confidence. The Coalition would like Welsh Government to either make it compulsory or incentivize local health boards and local authorities to make asylum awareness and NRPF training available to all staff.

13. We want to ensure that mental health problems are not a barrier to achieving potential in all areas of life. How can we better achieve this for refugees and asylum seekers?

13.1 Welsh Government have acknowledged the value of volunteer and mentoring schemes in ‘combatting isolation and depression for those living in dispersed accommodation’. A commitment to rolling this out to the four dispersal areas would be very welcome. Where this is referenced again on page 23, it should be ‘asylum seekers and refugee mentors’.

14. Every person should be equipped with the skills they need to get a job and the opportunity to develop new skills through their working life. How can we better achieve this for refugees and asylum seekers?

14.1 It is vital to provide employment support and ESOL that can target the needs of a range of skilled adults - not least for those seeking professional roles where English language requirements can be high, learning from the successful programme to support doctors.

14.2 In addition to the detailed feedback on specific delivery plan action points outlined previously, Digital Communities Wales are refreshing their Train the Trainer toolkit for people working with sanctuary seekers, though the funding to deliver the training is coming to an end in the next year. This toolkit could be referenced here, with a commitment to support its wider roll-out.

14.3 For children and young people, funding could be made available to learn new skills in fun ways, in the community and with other young people. For those not able to access employment, volunteering opportunities and work experience is critical to integration and positive mental health. Projects like the Sanctuary in Newport offer activities and outings with under 18s to enhance wellbeing and in some cases, contribute to the learning of new skills. EYST In Swansea have projects

which also teach important skills. Tros Gynnal Plant's Participation aims to help with the development of skills over time. More funding and initiatives like these are needed in other areas.

15. Can you identify any additional effects of this document (positive or adverse) on the Welsh Language, Equality or Children's Rights? To assist with this you will need to refer to the Welsh Language, Equality and Child Rights impact assessments which accompany this questionnaire. Please explain your view and any suggestions for how the document could be revised so that positive effects could be increased, and negative effects mitigated

15.1 With regard to focus group consultation with UASC referred to on page 3 of the Children's Impact Assessment, it says that 'specific consultation question is to be included in the consultation about the most appropriate and beneficial way of communicating with Refugees and Asylum Seekers, including children and young people'. There doesn't appear to be a question of this kind in the and the Coalition would like this shortcoming addressed.

15.2 The Coalition is disappointed that there is no child friendly version or citizen/person friendly version which of consultation documents that people could access independently.

16. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

16.1 The Coalition remains deeply disappointed that the Welsh Government rejected recommendation 6 of the ELGC's report 'I used to be someone', which called for **extending concessionary transport schemes** to refugees and asylum seekers to improve access to education, employment and volunteering opportunities. Cost of transport is a particular issue for asylum seekers living on asylum support rates, which are insufficient to cover bus travel. This is of huge detriment to social inclusion and community cohesion. In particular, for those children and young people Tros Gynnal Plant work with who are not eligible for a bus pass, this restricts access to sport and other activities and can add to issues of isolation and poor mental health. While Coalition partners continue to work on grant-funded projects and with local councils to address this issue where possible, the Coalition would like to impress upon Welsh Government the importance of this issue and urge them to reconsider its approach.

16.2 **Language barriers and issues around finding suitable interpreters** is a significant issue which many individuals and support agencies encounter. The WITTS Language service in Cardiff will only take bookings from Statutory Bodies and to alter this arrangement to include third sector agencies would require the agreement of the approximately twenty statutory agencies who signed up to use the service when it was initially set up. Alternative services are expensive and not always reliable or suitable. There is a wealth of language expertise in the sanctuary seeking community itself that is not currently used to its greatest advantage. The Coalition asks the Welsh Government to consider investing in a scheme that will allow public and third sector services to access that reservoir of interpreting talent. Options may include working with education providers to operate or subsidize a basic, accredited translation course for sanctuary seekers which would offer public and third sector organizations quality assurance when recruiting volunteers. There will be many organizations who would be interested in offering students experience in translation and interpreting which could contribute to a portfolio for assessment. Public sector organizations could be encouraged to identify such opportunities where volunteers can support services, resulting in a cost reduction for them. These savings could contribute to the cost of the translation course. Ultimately, this course could offer access to the labour market for interested refugees.

16.3 The Coalition are disappointed that the plan makes no reference or commitments to **family reunion**. There is little support available specifically for families being reunited under Family Reunion legislation, despite those joining the sponsoring refugee adult having protected characteristics, they themselves also being refugees, and predominantly being women and children. These families

require practical support to navigate and access complex systems such as housing, benefits, education and health. Reunion itself can be another transition crisis point at which they are at a higher risk of experiencing financial hardship and homelessness or severe overcrowding. These risks place additional strain on families at a critical time as they attempt to rebuild home together after what can be years of separation and disrupted family life. These outcomes are not inevitable and that by making some changes the experience of both family reunion and subsequent integration into Wales' communities would be improved. We ask that Welsh Government make a commitment within the plan to explore the needs of families being reunited with an intention to build on current practice and improve well-being and integration. This would support the Welsh Government's principle of *integration beginning on day one*.

For further information, contact:

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Welsh Refugee Coalition members:

1 day without us	Migrant Help
Aberystwyth University	Mind Cymru
African Community Centre	Novo Jibon
Amnesty Cardiff	Oasis Cardiff
Asylum Justice	Oxfam Cymru
Asylum Matters Project	Race Council Cymru
Barnardos	Race Equality First
Bethel Sanctuary Project	Refugee Info Bus
British Red Cross	Save the Children
Cardiff City of Sanctuary	SEWREC
Children in Wales	Share Dydd
Christian Aid	Share Tawe
Citizens Wales	Show Racism the Red Card
City of Sanctuary	Snap Cymru
Colwyn Bay Amnesty Group	Space4U
Community Housing Cymru	Swansea City of Sanctuary
Croeso Penarth	Swansea University
Croeso Teifi	Syria Association in Wales
Diverse Cymru	Tai Pawb
DPIA	TCC
Evangelical Alliance	The Equality and Human Rights Commission
EYST	The Gap
Focal Point Merthyr Tydfil	Trinity Centre
Hay Brecon & Talgarth Sanctuary for Refugees	Tros Gynnal Plant
Henna Foundation	WCIA
Hope not Hate Cymru	Welsh Refugee Council
Mental Health Foundation	Women Connect First
Mid Wales Refugee Action	