

Deadline: 30 March

[REDACTED – SECTION 40(2)]

**Consultation
Response Form**

Organisation (if applicable): Welsh Refugee Council

[REDACTED – SECTION 40(2)]

Note: Please answer each question below. Please aim to use no more than 500 words. Short repossess are welcomed. The text box will expand as you type, however should you prefer a handwritten response, please add sheets to your submitted return to:

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Question 1 Do you consider that Section 3 of this document summarises the main issues that should be considered in relation to this funding programme? Please outline any issues which you feel are missing or need further attention

Yes, we agree that Section 3 of this document summarises the main issues that should be considered in relation to this funding programme

However, while we feel that this document summarises the main issues, it was noted that there is a lack of reference to the implications of the Covid 19 pandemic and Brexit, both of which may have a substantial impact on refugees and asylum seekers in Wales

This consultation document seems to have been written and developed in isolation to the Covid 19 pandemic and therefore doesn't recognise the huge impact it has had on organisations to deliver their services effectively and efficiently. It also doesn't make reference to the potential huge surge in demand for services post Covid 19 that will greatly impact on the third sector. The sector is heading into unprecedented times.

Brexit will also have an impact on the services required for asylum seekers and refugees as the UK shifts back towards the 'Hostile Environment' with new UK

Government policies on immigration. In the future, Wales will see an increase in undocumented and destitute migrants (failed asylum seekers) who have fallen foul of the new UK policies and will be in dire need of support to regularise their status. (I.e. Change in Third Country application process)

In summary, we feel that the new funding stream needs to take into account the impact that both Covid 19 and Brexit will have on the third sector to deliver projects and services efficiently and effectively whilst making the greatest impact.

Question 2 Do you support the proposal for a longer, 5-year programme? If not, please briefly outline your reasons.

Welsh Refugee Council would be very supportive of a longer, 5-year programme. It is important to WRC and partners that we can secure multi-year funding to build resilience within our organisation and sector, to allow us to improve recruitment and provide staff with greater job security, and to improve our ability to evaluate the work we do.

Funding for one of our key programmes funded by Welsh Government is only provided on a 12-month basis. Welsh Government funding accounts for 50% of our income but having to reapply annually makes us more vulnerable should that funding be withdrawn.

Multi-year funding would be particularly welcome for the following reasons:

- **SECTOR UNDERFUNDING:** The refugee sector is chronically underfunded. There are currently only 3 funders exclusively funding work in this area. A report by Migration Exchange showed that 63% of grants for the sector are less than £100k and almost 40% are less than £25k. Multi-year funding allows us to be more resilient in the face of these funding challenges.
- **STAFF RETENTION:** We are committed to developing our staff and building knowledge within the organisation. All frontline staff are trained to OISC Level 1. However, with staff on short-term contracts that knowledge often leaves an organisation as staff look for more secure work.
- **BETTER EVALUATION:** With longer term funding in place, we can plan and deliver better ways of evaluating the work we do. We can build a stronger evidence base for the impact of our work and better inform future planning and delivery.
- **LESS FUNDING FOR WALES:** Historically, Wales has received lower levels of funding relative to the levels of deprivation in the nation. This makes it increasingly difficult for Welsh charities, like WRC and partners, to respond to the needs of our clients and provide a strong voice for the sector.
- **CASEWORK NOT FUNDED:** There is a reluctance for funders to fund casework. There is a view amongst funders that casework is endless. However, casework provides the evidence base for the policy and strategic work that can deliver systemic change.
- **SOLE FUNDRAISER:** WRC has a fundraising team consisting of just one dedicated fundraiser working directly with the CEO. Annual reapplications to funders puts a strain on our limited resource and restricts our fundraiser from being able to generate income from different sources.

Question 3 Would you support Welsh Government providing core funding for some strategic equality organisations? If not please briefly outline your reason

The Welsh Refugee Council believe strongly in providing core funding to key strategic equality organisations as they play an important role in the policymaking process by supporting and engaging communities and informing understanding of the issues experienced by equality groups.

The strategic objectives of the WRC align closely with the Welsh Government 'Nation of Sanctuary' plan and therefore we believe the organisation is in a key position to inform policy development and implementation.

Our sister organisation the Scottish Refugee Council have successfully been a core funded strategic partner of the Scottish Government since 2002. This close working relationship has enabled the development and implementation of the 'New Scots: Refugee Integration Strategy 2018 to 2022' across the country. This strategy was a collaboration between the SRC and the Scottish Government and is able to demonstrate a marked difference to the lives of asylum seekers and refugees across Scotland.

In addition, the WRC believe core funding would help specific underfunded and threatened third sector organisations in effective planning to deliver on their, as well as government's, longer-term strategic aims. As well as stabilising the sector and enabling the development of longer-term relationships with government and other public bodies. Ultimately leading to a more effective use of public money.

Core funding and protection is a must for the asylum and refugee sector, the report Access Denied. The Human Impact of the Hostile Environment (2020) highlighted that successive UK governments have created a hostile environment for asylum seekers. This hostile environment presents by:

- Long waits for a decision. Just 25% of asylum seekers get a decision within 6 months, and the Government collects no data on those waiting longer than 6 months. Anecdotally we know this is often years, meaning AS are living in abject poverty conditions.
- the lack of support for those in the asylum process.
- asylum support rates being just £39 per week (for clothing, toiletries, travel, food, mobile and credit, medicine).
- Number of inappropriate accommodations that are in disrepair and/or dirty.
- Following an asylum decision, all asylum seekers are evicted from home office accommodation. Those who are appeal rights exhausted have 21 days to move out, and those with a positive decision have just 28 days to find accommodation and means to support themselves.
- Refugee Status to remain in the UK is short lived- lasting just 5 years, before they must reapply.

- The UK Government prevent 98% of Asylum seekers from working whilst awaiting their decision.

Unfortunately, immigration status is not a protected characteristic - which leads to inadequate support and funding being in place.

We would like to see an invest to save approach by Welsh Government that recognises and appropriately funds asylum integration from Day 1. The current asylum system creates and add to mental health issues of asylum seekers – leaving long term trauma.

However, feedback from the ARP partners on this question is that as the lead partner the WRC could be potentially set to benefit whilst the others are not considered. Core funding is essential for the sustainability of all partners.

Question 4 Do you support the continuation of existing services for particular groups? Are there other services which you think should be provided in future? If not, please briefly outline your reasons.

Yes, we support the continuation of existing services for particular groups – if they review their work, look at lessons learned, and develop to be the best they can. The approach by the Equality and Inclusion Team in being a critical friend is appreciated and it is hoped this continues to aid all projects.

At the Welsh Refugee Council, we have developed our services in line with the Coronavirus pandemic and horizon scanning of needs. Over the last year we have also:

- Delivered English language tuition to 12 staff - helping us to develop our staff pathways and ensure those with lived experience receive a variety of targeted support.
- Rolled out a freephone Helpline and secured Coronavirus emergency funding to fund 2 more Triage workers. Since April we have taken over 30,000 calls in total.
- Supported asylum seekers with educational opportunities that they would not otherwise have access to.
- Developed a partnership with a local church to deliver food parcels and hygiene items to those who are destitute.
- Launched our Oak Foundation project, focusing on reducing those with NRPF.

The budget for the Equalities and Inclusion Programme is very small. It would be useful to understand other funding opportunities within Welsh Government departments to address the following needs:

- Mental Health provision within AS&R organisations
- Digital inclusion
- Behaviour changes and campaigns work. For instance, we know that some refugees hold out from accessing private rented accommodation as their networks inform that they can access social housing. There is a piece of work here, around

engaging with community leaders, myth busting on private rented sector and highlighting the benefits.

- The number of refugees not in employment also remains high- more funded work at the pre-employment stage around building confidence, understanding cultural differences in the workplace needs to take place.

The Asylum Rights Programme currently works at full (if not over) capacity and it is still unable to meet the full needs of asylum seekers in Wales, the demand for services is hampered by lack of resources.

The work of the Asylum Rights Programme makes a huge impact on the lives of asylum seekers in Wales. As the E & I fund is relatively small, partners are concerned about dilution of services should the fund be spread more widely amongst other particular groups.

Question 5 What should be the balance between procured services, core funding and grant-funded projects? How would you split the budget (currently £1.6million) between these areas?

The budget of £1.6 million for the whole of Wales is very small - given the level of need. It is recommended that key areas are identified, as well as the funding required, and that Core funding should be ringfenced inline with this

Core funding should be awarded/or given to organisations that work with those facing the greatest disadvantage, where there are known funding and service gaps AND where the beneficiaries are at greatest risk due to political and sensationalised media.

Procurements have positives, but also carry negative aspects which should be carefully considered in light in of inequalities.

Procurement favours larger organisations that have the expertise and capacity to handle a procurement portal and process. The Sell 2 Wales portal is far from ideal, being clunky in nature and not the easiest to navigate. Such portals create a barrier to smaller organisations to apply. Larger organisations may not necessarily have the grass root trust within communities, and they often do not have natural referral mechanisms. Welsh Refugee Council has experience of being asked by 'contracted suppliers' to provide client referrals for free - such systems destabilise frontline organisations.

The second concern with Contracts is the building up of organisational surplus - arising from the contract. We have witnessed how contracts to organisations like Clearsprings have enabled organisations to build substantial profit, whilst at the same time, they receive criticism for substandard accommodation to clients.

Question 6 Do you agree that this funding should align with the objectives set out in the Welsh Government's Strategic Equality Action Plan 2020-2024?

Yes, the WRC and ARP partners agree that the funding should align with the Welsh Government Strategic Equality Action Plan 2020-2024 as this plan remains relevant and a working document.

During the consultation phase of the plan, the WRC contributed to the process and the thoughts and ideas highlighted in our response still remain relevant and pertinent. For example

Those seeking sanctuary in the UK have fled persecution due to their race, religion, nationality, political opinion or of being part of a particular social group e.g. women fleeing gender based violence, LGBT+ individuals. That means that those we work with have already suffered enormous discrimination in their country of origin, will have often faced traumatic experiences on their journey to Wales and arrive in a country where their membership of those groups are likely to result in further barriers to fulfilling their potential.

It has long been a challenge that immigration status is not recognised as a protected characteristic as many of the challenges faced by our client group is based as much on their immigration status as their race and/or religion. This can include barriers to accessing services and support due to a lack of understanding of their status, for example we have known asylum seekers with disabilities or aged over 60 refused bus passes as advisors in public bodies were not aware that asylum seekers could access concessionary transport schemes- this remains a challenge for our clients.

In addition to this, we also welcome the commitment to place the needs of those with shared protected characteristics at the forefront of design and delivery of all public services in Wales, however we would argue these need to go beyond protected characteristics and look at the additional barriers faced by refugees and asylum seekers to access services as outlined below.

Through their extensive needs many of our clients require cross section services in order for them to live fulfilled lives free of persecution. For example, our clients regularly access services from gender-based violence organisations, LGBTQI+ and disability organisations. Therefore, we believe that intersectionality and community cohesion is essential for the delivery of robust services.

We want to see all sanctuary seekers flourish and live safe and happy lives in Wales and so welcome the commitments to gender equality, to the elimination of identity-based abuse, harassment, hate crime and bullying. We know of several clients who suffer discrimination, hate crime and bullying, and we welcome efforts to support them being able to live without fear or abuse.

Question 7 Do you think that some of the funding should be set aside to support wider equality action and collaborative working between equality organisations?

Given that the pot of funding is so small, just £1.6million for the whole of Wales it is not recommended that the funding pot is reduced further by sectioning off part of the funds for wider equality work.

Our ARP Partners agree that many equality organisations already come together on forums, and at times it can feel 'forum heavy'. For instance, the Welsh Refugee Council sits on over 40 Forums/external groups. Our partners have also highlighted that much organic cross sectoral networking already takes place and is effective in its current informal manner.

Some Funders create annual or biannual conferences for their grantees to come together to discuss lessons learned, and areas for development. This is often well received and enables other funders to attend and hear updates on thematic issues.

To increase the budget and areas for development and collaboration, it is recommended that Welsh Government work with other funders to seek Match funding. The largest non-government funders in Wales are The National Lottery Community Fund, and the Moondance Foundation. Equality and inclusion is a key driver for TNLFCF and would be a good ally in this field.

Match funding on equality and inclusion, would also enable shared learning between funders, support policy development and build extra capacity within this sector.

If the Welsh Government are keen to see more formal collaborative working, we recommend/ that WG lead on this strategically instead of shifting resources from an already overstretched budget

The semi regular E&I grantee sessions previously hosted by the Welsh Government were useful and informative; could these be made more frequent as a means of encouraging collaboration?

Question 8 Do you agree that this funding should align with our specific equality plans such as the Gender Equality, Race Equality and LGBT+ Action Plans?

Yes, the Welsh Refugee Council shares the same vision and outcomes of the Welsh Government's 'Nation of Sanctuary' Plan. Therefore the work of the organisation and the Asylum Rights Programme partners align closely with the plan associated with our area of specialism.

Question 9: We would like to know your views on the effects that these proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What

effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We do not believe that the proposal will have a direct impact on the Welsh language, particularly on our client group.

Question 10: Please also explain how you believe the proposed policy approach could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language.

And on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

To have positive effects on opportunities for people to use Welsh, the WRC believe that we need to consult with the target group and to increase their motivation to learn Welsh. It is because many asylum seekers and refugees are not native English speakers, their priority would be learning English, as English is the dominant language in Wales and their livelihood will likely depend on their English skills. Learning Welsh will not be their priority, and learning two languages is difficult for those who have/are experiencing trauma. Therefore, we need to carefully consider how to move asylum seekers more towards the Welsh language; what might motivate them and what incentives might be given? We believe a holistic approach to integrating refugees and asylum seekers into Welsh society is required. We need to rethink the integration process. Learning Welsh should become an integral part of the integration process. Welsh language course should be offered to new migrants.

Question 11: 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:

We appreciate the time being given to the consultation and opportunity to feed in. We hope the programme is being developed inline with the Welsh Government Code of Practice of Funding.

To help us plan our work and engage our ARP partners, it would be helpful to know timelines for the revised Equalities and Inclusion programme opening. This would enable us to project plan – with known programme parameters.

We would hope that at least 3 months' notice would be given to any grant programme ending- so that if successful- we are more likely to retain our existing and trained casework staff. The shorter the period for knowing the funding outcomes of the programme- will more likely result in staff turnover and expertise leaving. It would also increase costs- as staff would need to be trained to OISC standards again.

When applications to the programme are open, it would be useful if you could ask organisations what they are doing in terms of creating career pathways and development for those facing racial disadvantage.

The Development of the programme should also consider key recommendations arising for the Third Sector Partnership Council, which are:

1. Multi-annual funding (including the potential for more sustainable funding models – e.g., links to budgeting agreements with Westminster and to full term objectives and plans of Government),
2. Flexibility of funding between years (by e.g. linking funding to long-term strategy rather than year on year budgets)
3. Creating clear/transparent/informed pre-funding decision-making processes around how to fund (Core vs Project Grant / Grant vs Procurement) and procure in order to deliver the best outcomes for our communities at a national, regional and local level.
4. Reforming procurement to enable the voluntary sector to bid in a way which matches their particular skill set and value. This includes emphasising social value (including using the Welsh TOMS) and developing more creative forms of procurement, focussing on what delivers the best service for the community, rather than a competitive process.
5. Implementing best practice learned from funding during the COVID-19 pandemic, both within the public sector and with non-statutory funders.

Yes, to remaining Anonymous.