

Written evidence submitted by Welsh Refugee Council (COR0228)

Institutional Accommodation

About us:

1. Welsh Refugee Council has been empowering asylum seekers and refugees to build new futures in Wales for over 30 years. We deliver direct specialist support to refugees and asylum seekers through our bases in Cardiff, Newport, Swansea, and Wrexham. We work extensively with a range of community, voluntary and statutory sector partners and strive to contribute to the creation of a society where respect and equality for all are paramount and where human rights are enjoyed.

2. We work with asylum seekers and refugees at some of the most critical points of their lives. Our work can make the difference between someone with a failed asylum claim spiralling downward into destitution, untreated health problems, and homelessness – or it can create an alternative future where they find their feet and begin building a life in Wales thanks to improved language skills, access to benefits, legal help, and other support that they are entitled to.

3. We provide advice, advocacy, and casework support to asylum seekers through our Asylum Rights Programme (a partnership of seven charities: Asylum Justice, Bawso, DPIA, EYST, City of Sanctuary, TGP Cymru and Welsh Refugee Council). Since the programme started in June 2017, the service has supported 3,000 asylum seekers through over 11,000 individual advice sessions.

4. Our services include supporting Refugees during the “Move On” period where they are given just 28 days once granted Refugee status to find housing and apply for mainstream benefits and support leaving many single refugees homeless. We are sub-contracted by Migrant Help to deliver the Positive Move-On service as part of the AIRE contract.

5. We also provide a safe play area for refugee and asylum seeking families providing a vital space where children can be children whatever their backgrounds and experiences and giving a lifeline to parents. We deliver community English classes at a range of levels free to access to those from refugee and asylum-seeking backgrounds at our offices in Cardiff and Newport.

6. In addition, we are currently contracted to deliver the Syrian Vulnerable Persons Resettlement Scheme (SVPRS), soon to be renamed the Vulnerable Persons Relocation Support Service, in one Local Authority area in South Wales.

Background:

7. Welsh Refugee Council has seen a number of asylum seekers moved into hotel accommodation both during the Covid pandemic period (from March 2020) but also prior to this in December 2019 lasting for periods far longer than 3-4 weeks.

8. In normal circumstances, when asylum seekers arrive in the UK after what is often a long and traumatic journey crossing continents, the Mediterranean and the Channel, they are given emergency accommodation, usually in the South East. From there, they are “routed” to one of seven initial asylum accommodation centres around the UK, including Cardiff in Wales. This is known as “Section 98” support. To access this support someone must reasonably show they are facing immediate homelessness and destitution.

9. Those who are accepted as **destitute** are accommodated by the Home Office in what is called **Initial Accommodation (IA)**.¹ For many years **Cardiff** housed the sole Initial Accommodation Centre in Wales and use of hotels was a feature of Initial Accommodation prior to the pandemic. Usage escalated substantially after the transition to the new Asylum Accommodation and Support Services Contract (AASC) which led to the closure of Lynx House which previously accommodated most IA residents. Since the Covid Pandemic, hotels, barracks, and alternative forms of temporary accommodation have been utilised in other parts of Wales such as Swansea and most recently Penally. Initial accommodation properties in Cardiff should be located centrally to vital health and wellbeing services, community mental health teams, hospitals, a number of different legal aid providers, and numerous third sector organisations and charities working in the asylum and refugee sector.

10. Initial Accommodation is intended to be temporary before individuals are dispersed to more permanent accommodation, called **dispersal accommodation** while awaiting a decision on their asylum claim. The Home Office advises that the period of stay in initial accommodation should not be longer than 3-4 weeks before being moved into dispersal accommodation.²

Asylum Support and destitution:

11. Rates of Asylum Support for those seeking asylum are already extremely low at £39.63 per week which must provide for an individual’s essential living needs, including food, hygiene products and travel. However, often those in initial accommodation are not provided with any financial support but are in “full-board” accommodation. In hotels and the barracks, we have had reports from asylum seekers that the food provided is not sufficient and people have been going hungry.³

12. We have long argued that hotels are inappropriate because they are full board and financial support is not provided for hygiene products and other essential living items. Currently those in need of hygiene products have to request these from Housing Managers which leaves many feeling embarrassed and puts some off asking for products such as pain killers. This means that many asylum seekers are going without necessary items.

13. We welcomed the Home Office’s recent decision to provide and backdate additional support of £8 per week for those living in full board hotel accommodation however it remains unclear as to how this will be delivered in practice.

¹ [Asylum Support: the Right to Remain Toolkit](#)

² [A Home Office Guide to Living in Asylum Accommodation – English \(publishing.service.gov.uk\)](#)

³ [Asylum seekers at Penally camp accuse Home Office of ignoring repeated complaints over food and conditions | The Independent](#)

Education:

14. We have seen school age children stuck in initial accommodation and hotels for more than 12 months in some circumstances and not able to access school education. In some cases children in IA were able to see school playgrounds from their windows but couldn't join their peers. Thanks to recent efforts by Cardiff Council and Welsh Government, children are now entitled to enrol in education. However, this is a recent development and the long-term impact on children who have been unable to access education for several months remains to be seen.

Internet Access:

15. Access to the internet has never been more important than during the Covid-19 pandemic. Asylum seekers often go without due to their accommodation not having access to internet and communal spaces like libraries and community centres being closed. Due to Penally's location there is extremely limited 3G or 4G coverage. We recognise that an internet connection was installed to allow residents to access Wi-Fi, however we have heard that there is very poor connection both for those living there and those working on site. This means residents are less able to access public health information, support, educational resources and connect with families and friends. It leaves them additionally isolated.

LGBTQI+ asylum seekers:

16. We are concerned about the impact of shared rooms in IA accommodation particularly for LGBTQI+ asylum seekers who may feel isolated and at greater risk from negative attitudes as a result of their sexuality. Asylum seekers have reported to us that a lack of safe spaces for LGBTQI+ asylum seekers as well as being accommodated in Home Office accommodation with other residents who are often homophobic and transphobic, leaves them feeling unsafe without support. Others report that they do not feel listened to when they raise such concerns and that there is no preventative approach and more vulnerable individuals who feel unable to speak out may be left additionally vulnerable. Glitter Cymru, DPIA and WRC are working together to raise these concerns and around the lack of provision of LGBTQI+ specific accommodation with the Home Office and Housing provider.

Mental Health:

17. Asylum seekers in hotels and Penally have reported their mental health and that of those around them declining rapidly, with frequent reports of self-harm and suicidal thoughts. We have heard reports that access to mental health support is rare and can be difficult to access.

Penally Military Base:

18. WRC is extremely concerned at the recent use of the Penally Military base in Pembrokeshire to house asylum seekers in Wales.⁴ Those seeking asylum in Wales have often experienced treacherous

⁴ [Plans to repurpose Penally camp 'shelved' back in 2016 due to the site being considered 'unsuitable' | News | Tenby Observer \(tenby-today.co.uk\)](#)

journeys, violence, torture, and exploitation. These adverse experiences do not disappear upon arrival in the UK, and asylum seekers often suffer continued trauma from their lives in their home country or from their journeys to the UK and can resurface in the form of Post Traumatic Stress Disorder for example.

19. Our eight key concerns are:

- 1. Hostile environment.** We believe it is inappropriate to accommodate asylum seekers in detention-like accommodation, separate from refugee communities and specialist support organisations, with limited opportunities for integration into local communities. Those accommodated in Penally have reported that they often feel as if they are being treated like prisoners and are in some cases under the impression that they are being held in a detention centre.
- 2. Isolated and lack of local support.** While the Camp is close to Tenby, there are no specialist refugee organisations in this area, or the same level of resettlement support that you see in the dispersal cities like Cardiff and Swansea. The geographical location of the camp – 2 hours by car from Cardiff and over 1 hour 15 minutes from Swansea - has made it challenging for existing third sector groups with specialist experience of providing vital wellbeing support to asylum seekers including ESOL classes and sports activities to access the site. It has also meant that those on the camp have had limited access to legal advice and support on their asylum claim.
- 3. Overcrowding in communal areas.** Asylum seekers in Penally have been sharing rooms with around 6 people per room, although we understand this has now dropped to 2-4 people per room and share communal spaces with more than 100 people when eating or watching TV.
- 4. Covid safety.** There are allegations from those in the camp, and concerns from visiting NGOs that staff are not using proper PPE, raising questions over health and hygiene provision and risk of Covid 19. The recent Covid outbreak in the Napier Barracks has exacerbated these concerns.
- 5. Room sharing.** We question the appropriateness of room sharing in Penally, not only because of the ongoing covid-19 public health crisis and the impact on mental health but also because we question whether this is permissible under the AASC contract which references the Welsh Housing Quality standards and states:

The 'Safe', 'Habitable', and 'Fit for Purpose' Accommodation standards in this Annex B to Schedule 2 are based on published guidance in the form of the Decent Home Standard, The Welsh Quality Homes Standard (WQHS) and the Scottish Housing Quality Standard (SHQS).⁵

The WQHS refers to the Bedroom Standard which states that:

⁵ B.1.3 AASC Schedule 2 Statement of Requirements, p.85

A separate bedroom is required for:

- *a married or cohabiting couple*
- *an adult aged 21 years or more*
- *a pair of adolescents aged 10-20 years of the same sex*
- *a pair of children aged under 10 years regardless of sex*⁶

6. Lack of local consultation. We also understand concerns from local residents who were not consulted prior to the site going live. Indeed, there was only one week between initial reports in the press and the first people being moved on site. An article appearing in the Western Telegraph on 15th September, 6 days before the first arrivals (on 21st September), stated that the sites potential use was still “*unconfirmed*”.⁷ Indeed, it appears consultation with Welsh Government and the Local Authority did not take place until days before the site opened. An FOI request sent to Welsh Government shows that the first written exchange on this issue took place on 13th September and highlights that on the 11th September Pembrokeshire Council officials were unaware of the proposal.⁸

This appears to be in contravention of the Asylum Accommodation and Support Contract (AASC) which states:

1. *The Provider shall liaise and consult with relevant Local Authorities to ensure that any Accommodation provided to Service Users does not adversely affect Local Authority developments or community plans.*
2. *The Provider shall, in selecting Accommodation for procurement, consult and liaise with Local Authorities regarding the suitability of Accommodation for Service Users, being mindful of the risks to Service Users and host communities from the use of the Accommodation for Service Users.*
3. *In the event that the Provider cannot reach agreement with the Local Authorities in such matters, it shall refer the matter to the Authority.*⁹

The lack of consultation and engagement with the local community in our opinion made the site ripe for targeting by right wing activists who have undertaken regular protests outside the camp since mid-September (with a pause over the winter months due to the covid-19 travel restrictions).¹⁰

The Welsh First Minister wrote to the Home Secretary on 18th September highlighting the need for proper arrangements to be in place and for engagement with the local community prior to the site opening. He asked for opening to be postponed by two weeks and noted: “*These preparations are essential to counter the rise in far right activity in and around Penally as a result of these proposals*”.¹¹

⁶ [Layout 1 \(housinglin.org.uk\)](https://www.housinglin.org.uk)

⁷ [Penally Training Camp's use for asylum seekers is not confirmed by UK Government | Western Telegraph](https://www.western-telegraph.co.uk/news/wales/2020/09/15/penally-training-camp-use-for-asylum-seekers-not-confirmed-by-uk-government/)

⁸ [atisn14343doc15.pdf \(gov.wales\)](https://gov.wales/atisn14343doc15.pdf)

⁹ 4.1.6 AASC Schedule 2 Statement of Requirements, p.53

¹⁰ For example see: [An unusual battle rages in a tourist town riven by the arrival of an asylum seeker camp - Wales Online](https://www.walesonline.co.uk/news/wales/2020/09/15/penally-asylum-seeker-camp-wales-online/)
[Far-right activist Tommy Robinson dubs Penally asylum seeker plans as 'sickening' amid social media storms | Western Telegraph](https://www.western-telegraph.co.uk/news/wales/2020/09/15/far-right-activist-tommy-robinson-dubs-penally-asylum-seeker-plans-as-sickening-amid-social-media-storms/)
['Far-right' protesters clash with police as migrants arrive at Wales camp | News | The Times](https://www.thetimes.co.uk/article/far-right-protesters-clash-with-police-as-migrants-arrive-at-wales-camp)

¹¹ [Eich cyf \(gov.wales\)](https://gov.wales/eich-cyf)

7. **Questions over the legality of the site.** We also note that in a recent Senedd session, when asked about the legality of housing asylum seekers in the Penally military barracks, the Welsh Counsel General responded that:

“in relation to the underpinning legal infrastructure and framework around the decision that's been taken by the UK Government, we've received no confirmation from them of the legislative basis on which they are themselves basing their decision to use Penally, so it's unclear to us whether the powers they have been using in relation to that have been properly complied with”¹²

8. **Contradicts the Welsh Governments Nation of Sanctuary Plan.** The opening of the site is in our opinion contrary to the aims of the Welsh Government's Nation of Sanctuary Plan which sets out a clear vision for Wales to become a welcoming home for those seeking sanctuary in the UK.¹³

Conclusion:

20. Initial accommodation is not a long-term or sustainable form of accommodation as determined by the Home Office. **We therefore believe it should not be used for any longer than 3-4 weeks.**

21. We believe that all Home Office accommodation in Wales should comply with the Welsh Housing Quality Standard as stated in the AASC with regard to room sharing between unrelated adults.¹⁴

22. The rapidity of the opening of the site at Penally and lack of engagement suggests that the Home Office had not ensured it was sufficiently prepared to provide the volume of accommodation needed to house those entitled to access accommodation support due to the pandemic. However, we would highlight that hotels were in use across South Wales as IA prior to the pandemic and this lack of capacity in the IA estate was exacerbated by the pandemic. We welcomed the Home Office's decision to pause evictions due to the public health crisis however we believe greater emphasis should have been put on finding accommodation that was safe, secure and community based rather than hotel or barracks accommodation.

February 2021

¹² <https://record.assembly.wales/Plenary/11146#C344102>

¹³ [Nation of Sanctuary Refugee and Asylum Seeker Plan \(gov.wales\)](#)

¹⁴ [Layout 1 \(housinglin.org.uk\)](#)