



Welsh Refugee Council

120 – 122 Broadway
Cardiff CF24 1NJ

Email: info@welshrefugeecouncil.org.uk

Phone: 02920 489 800 | Fax: 02920 432 999

Submission of evidence to the National Assembly for Wales' Equality, Local Government & Communities Committee inquiry into Refugees & Asylum Seekers in Wales (November 2016).

1. Welsh Refugee Council.

1.1 For over 25 years, Welsh Refugee Council has been working people who are fleeing persecution, conflict & oppression. We deliver direct specialist support services to refugees in Cardiff, Wrexham, Newport & Swansea & work to empower asylum seekers & refugees to build new futures in Wales. We work extensively with a range of community, voluntary & statutory sector partners & strive to contribute to the creation of a society where respect & equality for all are paramount & where human rights are enjoyed. We are an active member of both the Welsh Refugee Coalition¹ & City of Sanctuary² movement in Wales. We welcome the opportunity to submit written evidence as part of this inquiry & outline our responses to each of the inquiry's 4 points below.

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

2.1 By the end June 2016, Local Authorities in Wales had resettled 112 refugees from Syria through the SVPRS. By October 2016, 17 of 22 Local Authorities had welcomed Syrian refugees through the scheme, with all others preparing to do so by December 2016. For many of these Local Authorities, refugee resettlement is a new area of work & great care has been taken to ensure it works for both the resettled families & the communities that receive them. The Home Office leads on the scheme, with the Welsh Government facilitating a Taskforce & an Operation's Board to co-ordinate the arrival & effective integration of people. Membership of the Taskforce & Board includes representatives from health, local government, education, the third & private sectors, the Home Office & police. Initially set up to oversee the effective implementation of the SVPRS, the remit of these bodies has been extended to include a Children's Task & Finish Group, which looks beyond the SVPRS to other Home Office schemes such as the Vulnerable Children Resettlement scheme & the UASC National Transfer Scheme.

2.2 We welcome Welsh Government's coordination role re the SVPRS, though also seek reassurances that:

Recommendation 1: Welsh Government are facilitating an evaluation of SVPRS in Wales & developing mechanisms to promote the sharing & expansion of good integration practice across public services and local authorities. This is especially important in areas where people are resettled in areas without diaspora communities.

1 A coalition of organisations working in Wales with asylum seekers & refugees at all stages of their journey, & with the communities in which they live. We work together in the interests of asylum seekers & refugees, to ensure that our limited resources can be used to best effect & to speak with one voice on policies & practices affecting people seeking safety in Wales.

2 <https://cityofsanctuary.org/>

Newport

125 Lower Dock Street
Newport
NP20 1EG
Tel: 01633 266420

Swansea

49 Walter Road
Swansea
SW1 5PW
Tel: 01792 630181

Wrexham

33 Grosvenor Road
Wrexham
LL11 1BT
Tel: 01978 355818



UK Registered Charity No: 1102449
Company Number: 4818136



Recommendation 2: Welsh Government ensure such learning is ongoing & used to inform responses to future refugee crises, in order that these responses can be rapid, as well as effective for refugees & the communities that receive them.

Recommendation 3: Welsh Government to require responses to refugee crises be incorporated into the remit of the Wales Resilience Forum & into Local Authority resilience & civil contingency planning.

2.3 In terms of the support available to people, we recognise the SVPRS as a gold standard in many ways: people are welcomed at their arrival point, taken to their housing, supported with cash until benefits start, are accompanied to health & education related appointments & supported to find employment. This contrasts to the support available to people who secure status in the UK after travelling independently of managed migration routes (often referred to as 'spontaneous' refugees). Welsh Government have funded Welsh Refugee Council on an annual basis since 2004 to provide advocacy support for these people gaining status³ whilst living in Wales or choosing to move to Wales following a grant of status through its move-on service. This service is in high demand & operates from offices in the 4 dispersal cities of Swansea, Cardiff, Newport & Wrexham. Over the quarter July – September 2016, this service supported 734 main applicants (196 of them were newly recognised refugees), with issues as varied as obtaining status documents, obtaining National Insurance numbers, opening bank accounts, applying for integration loans & benefits, seeking employment & accessing homelessness, housing & health services. Through this advocacy provision, we know that people, immediately after being recognised as in need of international protection, are highly likely to experience financial hardship, homelessness & destitution (see also Refugee Council's 'England's Forgotten Refugees'⁴ and Red Cross's 'The Move-On Period: An Ordeal for New Refugees'⁵). People moving through the SVPRS are not as vulnerable to these experiences as, arriving with status, they do not face a 28 day move on period, as administrative procedures (particularly around obtaining National Insurance numbers) that contribute to such problems are addressed earlier. We are concerned that the level of investment & focus on Syrian refugees moving through the SVPRS compared with the investment & interest in spontaneous refugees has created a two-tier system. This impacts directly on refugees in Wales at a vulnerable time in their lives, creating tensions between members of the Syrian community & negatively influencing personal perceptions of welcome. It encourages public misunderstanding around the need for international protection & contributes to the damaging rhetoric of the 'deserving' versus 'undeserving' migrant.

2.4 We urge the committee to acknowledge & address this two-tier system by seeking commitments from Welsh Government to:

Recommendation 4: demonstrate leadership & proactively promote positive messages & narratives about *all* refugees being welcome in Wales, as well as the benefits of migration to Wales.

Recommendation 5: fund the refugee move-on service on a long-term & sustainable basis.

Recommendation 6: extend the remit of the Syrian Taskforce & Operations Board to include *all* asylum seekers & refugees.

Recommendation 7: vocalise the impacts of UK policy (e.g. homelessness, destitution & an associated pressure & demand on public & third sector services) on people in Wales & actively seek to influence Home Office policy & practice in the following ways:

- The Home Office should ensure that relevant documentation (e.g. NINO & Biometric Residence Permits) is received by refugees at the same time as they are informed of their status.
- Where an application has been made for welfare benefits within the 28 day move-on period, the Home Office not cease asylum support until the first payment has been made, including where that payment is a short-term benefit advance

³ <http://welshrefugeecouncil.org.uk/what-help-do-you-need/i-have-been-granted-status>

⁴ http://www.refugeecouncil.org.uk/assets/0003/7935/England_s_Forgotten_Refugees_final.pdf

⁵ <http://www.redcross.org.uk/en/About-us/Advocacy/Refugees/Ending-destitution/The-move-on-period>



- The target time for processing an application for an Integration Loan must be less than the length of the move on period. When a newly recognised refugee has applied for an Integration Loan & has not yet received it, they should be allowed to remain in their asylum accommodation
- UK Government guidance to banks to advise them what documents are issued to refugees & others with leave to remain in the country so that they are encouraged to recognise them as evidence of identity. Bank staff should also be familiarised with the types of ID refugees have available to them.

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

3.1 Whilst this plan was welcome, Welsh Refugee Council had concerns that it would neither address critical issues for people seeking sanctuary in Wales, nor create the conditions needed to ensure that people are safe, able to contribute & integrate into communities or enjoy their human rights. Since the committee's consultation in August, Welsh Government have proposed a budget & an outline specification for work they would like to see delivered under the Refugee, Asylum Seeker & Migrant strand of their Inclusion Fund from April 2017. This proposal has been through a number of iterations, with the most recent including areas of work which are missing from the Delivery Plan, though fundamental to recognising & securing the rights of asylum seekers & refugees in Wales: legal advice, advocacy for children & young people & destitution. The latest iteration of the proposal additionally included an uplift in the level of funding available to deliver the work. These developments are very much welcomed. Concerns remain however:

3.2 Ambition

The plan provided missed an opportunity to champion Wales as a Nation of Sanctuary, with clear commitments to improving equality of opportunity, rights based approaches & humane practices. It missed an opportunity to reiterate previous Welsh Government⁶ messaging that integration begins on day one of arrival (rather than upon receipt of status or approaching the point at which people are eligible to apply for citizenship or naturalisation) & the opportunity to contextualise & celebrate Wales' response to often restrictive UK/Home Office legislation & policy, as well as to challenging international humanitarian crises. Scotland's Refugee Integration Strategy, *New Scots: Integrating Refugees in Scotland's Communities*⁷ offers such ambition, whilst remaining pragmatic.

Recommendation 8: Future updates of the plan to promote Wales as a Nation of Sanctuary, re-assert Wales' commitment to integration beginning on day 1 & to acknowledge & celebrate Wales' response to the UK & international context in which the plan is contextualised.

3.3 Accountability

The plan lack clear actions, indicators, benchmarks, lead responsibilities, timeframes or a monitoring & evaluation framework.

3.4 Housing & advice services

a. *Move-on:* As outlined above (section 2.3), Welsh Government fund Welsh Refugee Council to deliver advice & advocacy services to newly recognised refugees (as well as to people with humanitarian protection & discretionary leave). This service is over-subscribed & works with, on average, 700 people a quarter. Evidence from this service highlights that people in priority need spend lengthy periods in temporary & often unsuitable/unsafe accommodation. People not deemed to be in priority need are generally unable to access private rented housing, due to the requirement to pay agency fees, one or two month's rent in advance, the need for a guarantor and lengthy delays in integration loans being processed. When people are able to secure private rented housing, there are concerns about the quality & cost. Where dedicated housing officers exist, with experience & understanding of refugee needs (e.g. in Swansea), evidence suggest that housing outcomes are much improved for refugees.

⁶ <http://gov.wales/dsjlg/publications/communityregendevelop/refugeeinclusionstrategy/strategye.pdf?lang=en>, page 22

⁷ <http://www.gov.scot/Resource/0043/00439604.pdf>



Housing is one of the areas likely to be impacted by the Immigration Act 2016. The Act provides for 'Right to Rent Checks', making it compulsory for landlords to check the immigration status of all new adult tenants. This places additional pressure on landlords, especially small-scale landlords who are private individuals and will exacerbate concerns of renting to anybody without clear immigration status or documentation and thus potentially increasing unintended discrimination. These checks could lead to destitution and an increase in homelessness, putting more pressures and costs on already stretched local authorities.

Recommendation 9: The Welsh Government should act to offset discrimination against refugees in housing, both as new refugees and later. For example:

- Issue guidance to Local Authorities classifying all new refugees as vulnerable so that they are regarded as in priority need for housing; alternatively, provide adequate funding to local authorities and accompanying guidance to enable newly recognised refugees who are not considered in priority housing need to benefit from rent deposit schemes.
- Consider ring-fencing a proportion of the 'Supporting People' fund for refugees (this fund helps people maintain tenancies, with a view to preventing homelessness).
- Ensure Local Authorities in dispersal areas have dedicated housing resettlement officers with an active role in assessing priority need for individual refugees.
- Undertake an Equality Impact Assessment (EIA) of Right to Rent Checks⁸ in Wales and monitor the impact of this legislation.
- Work with private landlords to raise awareness of different types of migration status to mitigate any impacts of Right to Rent Checks in Wales.

b. Asylum housing: Despite housing being devolved to Wales, asylum housing is an exception to this. This is problematic as housing is a major issue for many asylum seekers with reports that the housing provided is often inadequate and unhygienic. Evidence collated by Welsh Refugee Coalition⁹ members highlighted failings with Initial Accommodation housing, failings which are often reported as issues in dispersal accommodation: overcrowding; poor states of repair; broken appliances, boilers & furniture; lack of maintenance; damp conditions & harassment and anti-social behaviour from other tenants and members of staff. Standards of service provision were reported as a serious concern, with a general feeling that the service provider had little appreciation of the difficulties faced by asylum seekers and their reasons for seeking asylum in the UK. This was accompanied with a perception that the service provider is more concerned with internal targets and profit generation than on providing a service that protects and supports vulnerable people. Asylum accommodation is a source of worry and anxiety for people living in it, aggravating pre-existing experiences of trauma, rather than providing a place of sanctuary. It is unacceptable that asylum housing in Wales is not subject to any independent scrutiny on standards nor subject to any independent means of complaint. This lack of accountability, coupled with the fact that asylum seekers are unlikely to complain because of a fear of retribution (from either the Home Office or from the housing provider) mean that people are forced to endure housing which would not be of an acceptable standard for any other publicly funded accommodation.

Recommendation 10: Welsh Government actively engages with the UK Visa & Immigration Asylum Accommodation & Support Transformation (AAST) stakeholder consultation to ensure that any new contract for asylum housing in Wales brings housing quality standards, complaints procedures, monitoring & enforcement in line with Welsh Quality Housing standards.

Recommendation 11: Welsh Government insist that the quality of asylum housing in Wales is scrutinised by either Welsh Government or local authorities

⁸ <http://www.taipawb.org/policy-influencing/immigration-right-rent-checks/>

⁹ Welsh Refugee Coalition Briefing for Welsh Affairs Select Committee, 29th February 2016



- c. Homelessness: Welsh Refugee Council, working in partnership with agencies like the Red Cross, see on average of 20 to 25 people who are destitute & homeless each week. People tend to be refused asylum seekers, newly granted refugees or women with insecure immigration status experiencing domestic violence. With the exception of refugees, people have no right to public housing, no money, no right to benefits & no legal right to work. As a result, this group of people are characterised by vulnerability, inability to satisfy essential living needs and poor health and wellbeing¹⁰. At Welsh Refugee Council, people are provided with small payments of between £5-£10 per week, items of clothing & occasionally food, as well as being advised where they can access community & faith based support (e.g. Sharedydd¹¹, Oasis¹² & Nightshelter¹³). Destitution is a breach of the rights of individuals & a community cohesion issue. It is also a resource issue, as the practice places significant & unpredictable demand & on Local Authority & third sector services.

Recommendation 12: In line with the Wales Refugee Coalition recommendation, Welsh Government expand the eligibility criteria for the Discretionary Assistance Fund (DAF) to include people who currently have no recourse to public funds (NRPF).

- d. *Advice Services:* Specialist advice & advocacy services for *refugees* have been funded by Welsh Government since 2004. Specialist advice & advocacy services for *asylum seekers* were funded by the Home Office in Wales until March 2014. The later ensured that asylum seekers were informed about their rights & entitlements & had a voice when faced with issues relating to their welfare. Advocacy for asylum seekers is likely to be offered again in Wales from April 2017, via Welsh Government Inclusion funding, though with the level of funding available, it is unlikely that provision will meet need.

3.5 Education

- a. *ESOL:* Gaining proficiency in English as soon as possible is one of the most important pillars enabling inclusion & integration & is identified time & time again in focus of asylum seekers & refugees as a key need. Welsh Refugee Council, in partnership with South Wales University, offer free ESOL in Cardiff to approximately 270 students per quarter. Their feedback on accessing ESOL informs our understanding of what is needed. We welcome commitments in the Delivery Plan to improve the flexibility of ESOL provision & for it to have parity with basic skills. We welcome the commitment to providing more contextualised ESOL provision in order that people are able to work towards updating their existing qualifications to those recognisable in the UK & to offer provision which meets the variety of leaner needs. Whilst these commitments and outcomes are welcome, for them to have the desired impact,

Recommendation 13: Welsh Government must ensure that provision:

- responds to gender based needs (e.g. women are often carers for children or other family members & so are more able to access provision outside of the school run or which has crèche facilities).
- continues to be available on a no-cost basis and irrespective of immigration status (mirroring the recognition that integration begins on day one).
- is accessible throughout the academic year

3.6 Employment

- a. *Employment, Volunteering and Training:* With access to the labour market the most critical aspect of migrant integration¹⁴, efforts to ensure refugees are empowered to utilise their skills and knowledge

¹⁰<http://www.redcross.org.uk/~media/BritishRedCross/Documents/About%20us/South%20Yorkshire%20destitution%20report.pdf>

¹¹<https://cardiffdestitutionnetwork.wordpress.com/sharedydd/>

¹²<http://oasiscardiff.org/about-us/>

¹³<http://newportnightshelter.org/>

¹⁴ Hagendoorn, Louk, Justus Veenman, and Wilma Volleburch, eds. (2003). *Integrating Immigrants in the Netherlands: Cultural versus Socioeconomic Integration*, Aldershot/Burlington: Ashgate.



and to achieve their full potential as members of Welsh society, as detailed in the Delivery Plan, are applauded.

Refugee communities in Wales often rely on 'word of mouth' within their own networks to find employment, rather than finding job opportunities through other means such as online search due to limited digital access & language barriers. This has led to a concentration of refugees in some low-skilled areas of the labour market. In 2015, about 19% of non-UK born residents in Wales worked in elementary occupations compared to 12% of those born in the UK¹⁵. Through our move-on service and our links with refugee communities, we know of many highly qualified individuals employed in low paid jobs in factories, even years after gaining status. Agencies such as Job Centre Plus, with their emphasis on moving people into work regardless of experience or qualifications, can exacerbate this situation by not looking beyond English language skills, as well as overlooking skills, experience & qualifications gained overseas.

Recommendation 14: Welsh Government to support Jobcentre Plus staff in Wales to increase their understanding of the barriers faced by refugees in job seeking to provide a person-centred service with improved longer term outcomes (e.g. refugees being employed in industries they are qualified for).

Recommendation 15: Welsh Government invest in systemic support for the transfer & recognition of qualifications: an education and employment advisor in each of Wales' dispersal areas and NARIC¹⁶ (national agency for the recognition and comparison of international qualifications and skills) membership for lead agencies.

Recommendation 16: Welsh Government, under its 'Prosperity for All'¹⁷ agenda, to work with business and industry to create training and internship programmes which maximise the use of refugees' skills & minimise time spent outside the labour market. This could include supporting employers to deliver tailored programmes to promote smooth access to the labour market complimented by specialist language provision where appropriate or intensive and flexible ESOL provision to fit around working hours – this would both enhance the skills of their workforce and promote the welfare and retention of employees.

4. The support & advocacy available to unaccompanied asylum seeking children.

4.1 Whilst Welsh Government's Delivery Plan acknowledges the need to 'ensure the UNCRC derived principles underpin children's policies & programme in Wales in the field of asylum & immigration', this is far from a robust commitment to protect asylum seeking children's rights in Wales. The plan's sole outcome to ensure 'UASCs are safe & supported in order to prevent isolation & social exclusion' similarly lacks fortitude. The Delivery Plan identifies a number of briefings & toolkits which can be used by service providers, though contains only one action to directly support the promotion of rights amongst children as rights holders themselves: that UASCs have access to independent advocacy in respect of the duties owed to them under the Social Services and Wellbeing Act 2014. Advocacy is very much needed as UASCs – before and after being formally recognised as such - have particularly complex needs which demand specialist knowledge & advocacy¹⁸. Currently, there is no such advocacy in Wales following the closure of Tros Gynnal Plant's specialist provision in 2014. There is a possibility that some advocacy provision for UASCs will be resurrected from April 2017 as part of Welsh Government's Inclusion funding – though again, concerns around levels of funding and competing priorities for this funding apply. This concern is heightened in light of plans to expand resettlement schemes with further Home Office initiatives for asylum seeking & refugee children.

Recommendation 17: Welsh Government reconsider their allocation of funding for work with UASCs and seek to provide dedicated, ringfenced funding (i.e. in addition to the Inclusion funding) in order to

¹⁵ Welsh Refugee Council, *Migrants in the Welsh Labour Market*, 2016, <https://www.welshrefugeecouncil.org/migration-information/migration-trends/migrants-in-the-welsh-labour-market>

¹⁶ <http://naric.org.uk/naric/>

¹⁷ <http://gov.wales/docs/strategies/160920-taking-wales-forward-en.pdf>

¹⁸ <http://welshrefugeecouncil.org.uk/resources/research/young-lives-in-limbo>



ensure compliance with recommendations made by the UN Committee on the Rights of the Child¹⁹ to 'provide sufficient support to migrant, refugee and asylum-seeking children to access basic services'.

Recommendation 18: Welsh Government to ensure that advocacy provision exists for all age disputed asylum seeking children and young people, not just those who have been recognised as UASCs and who are looked after.

5. The role & effectiveness of the Welsh Government's Community Cohesion Delivery Plan in ensuring the integration of refugees & asylum seekers in Welsh communities.

5.1 *Departments, organisations and people understand hate crime, victims make reports and get appropriate support (Outcome 1):* Welsh Refugee Council's focus groups with people around hate crime suggest that experiences of hate crime are common amongst asylum seekers and refugees and that much more work needs to be done to ensure that people to recognise hate crime and develop the confidence and trust in services to report it²⁰. This is especially pressing given the rise in hate crime reported following the Brexit vote.

Recommendation 19: Welsh Government, as part of their Framework for Action on Tackling Hate Crimes & Incidents, to require real or perceived migration status to be recognised & recorded as a reason for Hate Crime.

5.2 *Increased evidence and awareness on immigration and supporting the inclusion of asylum seekers, refugees and migrants (Outcome 4):* Funded by Welsh Government, Welsh Refugee Council, in partnership with the Centre on Migration, Policy and Society (COMPAS) and the Migration Observatory at the University of Oxford, lead the Migration Services in Wales project. This project provides up-to-date information on migration policy and practice & facilitates the development of a strategic approach to migration in Wales. As part of this project we produce Legal and Policy Briefings²¹, have provided specialist training²², support the development of local strategic frameworks on migration²³ and provide a migration enquiry service²⁴. All aspects of this project contribute directly and significantly to this outcome, an outcome that will be jeopardised when this work ceases in March 2017 due to the cessation of Welsh Government funding.

Recommendation 20: Welsh Government invest in continuing and building on the work of the Migration Services project to ensure that practitioners and policy makers in Wales have access to up-to-date, Welsh specific, information on migration trends and migrant rights.

Recommendation 21: Welsh Government develop a comprehensive National Migration Strategy to address poverty, the labour force and economic renewal of Wales, alongside commitments to equality and human rights and clear messages on the role of migration in Wales' future and the status of migrants in Welsh society²⁵. Scotland's Strategic Migration Partnership Policy Toolkit provides a good example²⁶.

5.3 Whilst a national strategy is needed to ensure that legislation and policy facilitate integration, it is Local Authorities that, with their partners, have the greatest capacity to build an inclusive culture and practice that touches on everyday lives. Local migration strategies (rather than ad hoc responses by

¹⁹ <http://gov.wales/docs/dsjlg/publications/cyp/160727-final-concluding-observations-2016-en.pdf> (76.f)

²⁰ <https://www.welshrefugeecouncil.org/news/07102016-1554/hate-crime-report-it>

²¹ <https://wrc.wales/migration-information/legal-briefings>

²² <https://wrc.wales/migration-information/training>

²³ <https://wrc.wales/migration-information/strategic-frameworks>

²⁴ <https://wrc.wales/migration-information/migration-enquiries>

²⁵ The conference report is available on the Migration Services in Wales webpage on Local Strategic Frameworks on Migration:

<https://wrc.wales/sites/default/files/Resource%20-%20Strategic%20Frameworks%20on%20Integration%20-%20Conference%20Report.pdf>

²⁶ http://www.migrationscotland.org.uk/uploads/files/documents/csmp_policy_toolkit_v2.0_0.pdf



individual services) harness shared goal across the authority, ensure consistency of approach and in communicating a common narrative, and to deliver joined up services. It ensures that full account is taken of the demographic context, that partner agencies can be engaged in considering the options and their role in delivery, and that measurable deliverables are identified.

Recommendation 22: Welsh Government to build on the work that it has funded since April 2015²⁷ and compel local authorities to develop local migration strategies.

5.4 *Key policies and programmes are supporting and evidencing delivery against the national goal on more cohesive communities through the Wellbeing of Future Generations (Wales) Act 2015 (Outcome 6):* The establishment of a 'buddy' programme or mentor system, with clear guidelines and safeguarding measures, which, with sufficient resource, could be coordinated by civil society at the local level and would establish early contact between new migrants and their local community. Throughout Europe, volunteering programmes for refugees promoted contact and understanding across diverse groups²⁸.

Recommendation 23: Welsh Government invest resource into harnessing the enthusiasm of the many people who have signed up to support refugees across Wales in recent months, including support for the development of established networks such as the City of Sanctuary movement. Additional resource for the voluntary sector would do much to support such efforts.

Recommendation 24: Welsh Government compel public service boards to include the needs of migrants, to ensure that the duties owed to different types of migrants are well understood by both front-line practitioners and policy makers and to encourage clear, positive messages on migrant integration. This should recognise the specific needs of vulnerable migrants as well as those of refugees and asylum seekers and demonstrate sensitivity towards the human rights challenges facing those with irregular immigration status.

6. Immigration Act 2016

In line with concerns raised by the Wales Refugee Coalition, Welsh Refugee Council urge the committee to consider the constitutional implications and potential impact of the Immigration Act 2016 in Wales.

Recommendation 25: Welsh Government should keep a close watch on UK policy on asylum and immigration and where there are adverse effects either lobby for changes or seek ways within its competence to mitigate these. In particular, Welsh Government should explore the impacts of the Immigration Act on individuals, devolved public services and on local authorities in Wales, commissioning additional research where necessary and putting in place policies to mitigate any negative impacts.

Tracey Sherlock
07817 333511
22 November 2016

²⁷

<https://wrc.wales/sites/default/files/Developing%20a%20Strategic%20Approach%20to%20Integration%20in%20Wales%20A%20practical%20resource%20for%20local%20authorities%20and%20their%20partners%20in%20Wales.pdf>

²⁸ Two examples from the UK can be found on the Cities of Migration website, Birmingham- [Meeting, Mediating and Mentoring: The Power of Peer Mentoring](#), London- [Time Together: Mentoring for Daily Life](#)