

30th September 2022

A DRAFT ASYLUM DISPERSAL PLAN FOR WALES

Purpose

1. This report sets out an outline of the draft Wales Asylum Dispersal Plan and seeks members views and, subject to comments, approval of the draft plan as the initial approach to meeting the Home Office's requirement, also noting the implications for councils.

Background

2. The legislative intention of the original policy of dispersal, introduced by the Immigration and Asylum Act 1999, was that no one area would be overburdened by the responsibility of supporting asylum seekers. Over a number of years, participation in dispersal has been voluntary, and as a consequence, populations of asylum seekers are not equally spread across the UK with some areas seeing large concentrations. In Wales, Newport, Cardiff, Swansea, and Wrexham have participated in asylum dispersal since 2001, with small numbers of asylum seekers recently accommodated in Conwy, Caerphilly, and RCT.
3. In April 2022, the Home Office announced that all local authorities in England, Scotland and Wales will be expected to be asylum dispersal areas under a policy of 'Full Dispersal'. The policy is designed to address the unsustainable pressures in the asylum system, increase the supply of dispersed accommodation across all UK councils, and therefore reduce the numbers (and costs) of asylum seekers accommodated in hotels across the UK. Over the summer, the Home Office has progressed with plans to reduce hotel use and achieve a more equitable spread of the asylum population by stepping up procurement, including the use of contingency hotels. This approach is part of a wider Asylum Transformation Project, which, going forward, seeks to improve the asylum system within the context of a place-based approach to migration.
4. A letter was sent to all council leaders from the UK Government setting out the rationale for the Full Dispersal policy and announcing funding of £3,500 for councils for each new bed space occupied, in both new and existing dispersal areas. The letter also announced that, in recognition of long-standing support for the dispersal programme, local authorities in England, Scotland and Wales accommodating asylum seekers on 27 March 2022 would receive a £250 one off payment per asylum seeker. In addition, £55k funding was announced for Strategic Migration Partnerships (SMPs) to bolster their strategic coordination role with a designated asylum lead, to help deliver the full dispersal policy

and, as a first step, a regional dispersal plan. (this post has not been recruited to date due to lack of clarity on funding beyond March 2023).

5. In July, based on Home Office planning assumptions of 100,000 arrivals until December 2023, each region and nation were allocated a share of the forecast asylum seeker population. In Wales, this is an additional 2,344 people (and it should be noted that approximately 70% of the asylum population requiring accommodation are single males). This is in addition to the current asylum seeker population in Wales of 3020 (as of July 2022), with 138 asylum seekers in three hotels in Cardiff as contingency accommodation and a proposal for an additional hotel to accommodate families which is in process. The increase would mean that Wales' share of the asylum population would be 4.7%.
6. The Home Office asked SMPs to develop regional dispersal plans which outlines how the regional allocations of asylum seekers would be distributed across respective regions and nations, working with the Home Office-contracted asylum accommodation provider, which, in Wales, is Clearsprings/Ready Homes (CRH).
7. The Home Office have asked that dispersal plans consider the impacts on urban and rural areas and market capacity and envisage that plans will provide local councils with more control and autonomy, by asking them to collectively agree an approach to dispersal in their region/nation.
8. If local councils are unable to agree an approach to dispersal in their nation or region, then the Home Office and its accommodation providers will move ahead with a dispersal plan 'backstop,' details of which are not yet known.

Development of a draft Asylum Dispersal Plan for Wales

9. The WSMP has developed a draft Wales Asylum Dispersal Plan at pace in response to a demanding timescale from the Home Office. The process comprised consultation with councils via two workshops, to which all 22 councils were invited, and further discussions with third sector partners providing services to asylum seekers in Wales. Views have also been sought from Welsh Government and incorporated into the plan, although Ministers are not yet sighted on the plan due to the tight timescale for submission over the summer holiday period.
10. A copy of the draft plan is attached at Appendix A. It comprises the following three elements:
 - Key strategic and operational principles which will provide the framework to deliver full asylum dispersal in the devolved Welsh context, including measures which prevent procurement going above the long-standing agreement of a maximum of 1:200 asylum seekers to settled population. The plan proposes that if any one council reaches 75% of its 1:200 limit, procurement should move to another council below that limit.
 - A spreadsheet prepared by Data Cymru including tables setting out the proportionate number of asylum seekers for each local council (based on

an estimated Wales national allocation of 2,344 people to be accommodated between September 2022 and December 2023).

- A spreadsheet prepared by Clearsprings/Ready Homes on how they will go about procuring properties in each dispersal area. Bed spaces will be sourced and managed by CRH in a phased approach, in consultation with local councils. It should be noted that the requirement is largely for accommodation for single males. The spreadsheet sets out a phased approach to delivery, and the Wales Strategic Migration Partnership will be supporting engagement with councils across Wales.

11. As the development of the plan took place during the summer break, there has been limited opportunity for councils to formally consider the implications of the plan for their individual councils or to approve the proposed allocation at the local level however officers were asked to ensure relevant politicians and senior managers were sighted and updated on its development as was possible or appropriate. WSMP also engaged and shared the draft plan with the lead Chief Executive, Group Leaders and the WLGA Spokesperson for Housing prior to submission.

12. To meet the Home Office timetable, the draft plan was submitted to the Home Office on September 5th. However, it was also noted to the Home Office that this was a pre-indicative plan, and subject to discussion and approval by the Executive Board at the national level. It is also anticipated that the plan will need to be reviewed and revised going forward, considering local pressures and the impact of other migration schemes (including Afghan and Ukraine resettlement), which will impact on the ability of the providers to procure sufficient appropriate accommodation.

13. The plan is due to be implemented from 13th September 2022.

Issues raised by councils and SMPs

14. In developing the plan, a range of issues were raised by councils about their involvement and implications, in Wales and the other home nations, some of which are yet to be resolved.

- Without an uplift in the contract value, the current situation of asylum dispersal accommodation being linked to the lower quartiles of housing market areas risks being replicated over a wider geographical area.
- The Home Office “back stop” plan has not been shared with SMPs or local councils, but many local councils are requesting an indication of what the backstop may be, and transparency on this would be beneficial.
- Contingency use: many regions have high numbers of asylum seekers accommodated in contingency hotels and have been clear in the need to include contingency populations in their plans but to date the Home Office have inferred that these figures should not be included.
- Competing demands: the continued demand for hotel accommodation is affecting local council homelessness duties, particularly as there has been a rise in Ukrainian households presenting as homeless. There is

- a risk that central, devolved, and local government departments and contractors could all be competing for the same stock.
- Funding: The new bedspace funding for local authorities is welcomed, but there is no clarity on funding for councils post March 2023 (this is subject to a New Burdens Assessment). SMPs are waiting for confirmation that funding for an Asylum Lead can be carried forward past the end of March 2023. There is a need for longevity of funding for the asylum post, ideally aligned to the length of the current AASC and AIRE contracts. There remains no funding for supporting new contingency accommodation (or commitment for existing contingency sites).

15. In Wales, over and above issues outlined above, concerns raised at initial discussions with council's centre on issues of rurality, infrastructure, capacity of councils and lack of available PRS accommodation. Discussions and engagement with the Home Office is ongoing in trying to resolve these issues.

Next steps

- 16. Over the summer, the WSMP has coordinated a series of discussions with providers, Home Office, third sector and councils new to dispersal, and will continue to do so, in line with the phasing approach set out in the plan. The WSMP also has established structures for oversight and review of the plan, including the Wales Asylum Board, the WSMP Executive Group and a Dispersal Strategy Group which will meet monthly to review progress. Regular updates will also be provided to members as appropriate, including any significant changes made to the Asylum Dispersal Plan for Wales.
- 17. The draft Wales Asylum Dispersal Plan is a pragmatic response to a Home Office requirement and incorporates a strategic and operational framework which seeks to ensure compliance with Welsh housing legislation, without disrupting the housing market, ensure appropriate support for asylum seekers and ensures that councils maintain control and oversight of dispersal in their local areas.
- 18. The principle of allocations based on population share was not contested by councils during development of the plan. Councils will be fully involved in discussions on how the plan is delivered, considering the challenges of responding to other UK Government humanitarian schemes and within the context of wider housing pressures.

Recommendations

- 19. **Members are asked to:**
 - a) **Comment on the content of this report and/or the draft Asylum Dispersal Plan for Wales as attached at Appendix A**
 - b) **Subject to any comments, approve the approach as set out in Table A as the initial approach to increasing asylum dispersal in Wales**
 - c) **Support the approach that any significant changes to the plan will be reported to members through the WLGA, as well as at the local level.**

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1. Introduction

- 1.1 As part of the delivery plan for full asylum dispersal (as announced by the UK Government in April 2022), the Home Office has asked Strategic Migration Partnerships (SMPs) across the UK to develop a 'Regional Dispersal Plan' (that is, a national plan for Wales), based on allocations of asylum seekers aligned to national population share. The aim of the Full Asylum Dispersal policy is to remove reliance on contingency accommodation such as hotels and ultimately to achieve more equitable dispersal of asylum seekers across the UK, and the intention is that all council areas will be actively involved.
- 1.2 The Home Office expectation is that the dispersal plans will consider the impacts on urban and rural areas as well as market capacity and will provide councils with more control and autonomy at a regional level by asking them to collectively agree an approach to dispersal in their region. The accommodation provider in Wales which holds the Asylum Accommodation and Support Services Contract with the Home Office is Clearsprings Ready Homes (CRH).
- 1.3 If councils are unable to agree an approach to dispersal in their region, then the Home Office and its commercial partners will move ahead with a 'backstop' plan for the nation or region.
- 1.4 Full asylum dispersal began on receipt of the letter in April and the Home Office providers will continue to work with councils to procure additional dispersal beds, identifying opportunities which will be tested with council before procurement. Any successful procurement of bed spaces between since April 2022 and implementation of the agreed plan will be deducted from the overall allocation for Wales.
- 1.5 For the purposes of this document, 'asylum seeker' is defined as anyone in receipt of S4, S95 or S98 support under the Immigration and Asylum Act 1999.

2. Development of a Wales Dispersal Plan

- 2.1 On 29 July, the Home Office informed the Wales Strategic Migration Partnership (WSMP) that the number of additional asylum seekers to be allocated to be accommodated in Wales as its contribution to Full Asylum Dispersal is 2,344 people by the end of December 2023. This would bring the total of asylum seekers to be accommodated in Wales to around 5,600 – an increase from around 3,100 in August 2022. A total of 5,600 is projected to equate to 5.6% of the UK asylum population. Wales' population equates to 4.7% of the UK total population, so Wales would be slightly exceeding our population share as a result of this Wales Dispersal Plan.
- 2.2 This Wales Dispersal Plan aims to set out how Wales will deliver the policy of Full Asylum Dispersal, framed by a set of strategic and operational

principles which councils would wish to see agreed to underpin successful delivery.

- 2.3 The plan also sets out the proposed indicative distribution of asylum seekers, reflective of a population-based share across all Welsh councils. It is subject to the ability of appropriate accommodation that can be procured by CRH. The spreadsheet set out below prepared by CRH, sets out a plan for how bed spaces for asylum seekers will be procured between September 12th and December 2023. It is anticipated that the plan as set out will be subject to regular review and potential change (see 'Challenges and Limitations' below p.10).
- 2.4 In developing a plan, WSMP has facilitated two workshops with good engagement from councils across Wales at a senior level, including Chief Executives (as well as Welsh Government and CRH) and has also held ongoing discussions with officers, including some areas where asylum dispersal has more recently commenced. Considering the views of councils, views on the proposed plan and its deliverability have also been sought from other key partners such as the Legal Aid Agency, Migrant Help, British Red Cross, Welsh Refugee Council and WLGA.
- 2.5 In 2021, WSMP developed a draft Asylum Dispersal Framework for Wales, setting out in detail how asylum dispersal would be operationalised, setting out roles and responsibilities and key principles. Formal agreement and approval of the draft Framework was put on hold while discussions on the plan for Full Asylum Dispersal was finalised. It is anticipated that the draft Framework will be updated to reflect the changed context for delivery working with Dispersal Strategy Group and Wales Asylum Board (September-December 2022).

3. Welsh Government Role

- 3.1 Although the immigration system is fully the responsibility of the UK Government, the Welsh Government has devolved responsibility for migrant integration, community cohesion, housing, and planning responsibilities, amongst other relevant policy areas. This includes the Welsh Government's Nation of Sanctuary plan. As a result, it is important the Welsh Government is consulted upon operational plans which relate to the dispersal or resettlement of different migrant communities across Wales. Consultation includes any changes to the level of dispersal or resettlement, proposed use of contingency accommodation or Accommodation Centres, or significant strategy proposals relating to support or movement of asylum seekers.
- 3.2 The Welsh Government attends the Wales Asylum Board and Dispersal Strategy Group, as well as providing some Welsh Minister oversight of developments through the Wales Refugee and Asylum Seeker Taskforce.

4. Key Strategic Principles

4.1 The following strategic principles have been agreed with and are supported by councils as ways in which they wish asylum dispersal to take place in their local areas:

- a) **Support for Wales in becoming a Nation of Sanctuary:** While asylum and immigration responsibilities are non-devolved, Welsh Government is responsible for a range of services required to support asylum dispersal, such as housing, health, and education. Welsh Government is committed to ensuring inequalities experienced by people seeking sanctuary are reduced, access to services and opportunities increased, and relations between newly arrived communities and wider society are improved. This forms the Welsh Government's [Nation of Sanctuary vision](#).
- b) **Integration begins on day one of arrival:** Successful inclusion is closely related to the standard of reception procedures and people's early experiences as asylum seekers. This principle is based on Welsh Government's policy as set out in the Nation of Sanctuary Action Plan. Home Office contracted providers (CRH and Migrant Help) will ensure all asylum seekers placed in Wales are encouraged to access the [Sanctuary website](#) to help with orientation and signposted to the Wales Sanctuary Service, where they need advice and support which Migrant Help cannot support with.
- c) **Welcoming environment:** In line with the Nation of Sanctuary, councils will continue to consider the ways in which they, the accommodation providers, third sector and wider civil society can support the aim of fostering a welcoming environment to asylum seekers, refugees, migrants arriving in their local area.
- d) **Access to Services.** Asylum seekers (and refugees) need access to appropriate services at every stage of the asylum journey, including to prevent destitution and homelessness following negative decisions. Services needed includes support on their rights, advice and guidance on integration and access to legal advice, including immigration advice. It should be noted that access to virtual legal advice is not seen as an effective solution to geographical shortages and is not part of a trauma-informed approach).
- e) **Trauma informed approaches:** Services to asylum seekers should be delivered within a trauma-informed approach, as advocated by Welsh Government, [Public Health Wales](#) and [Traumatic Stress Wales](#), also recognising the need for the provision of mental health support as required.
- f) **Partnership working:** In managing asylum dispersal in Wales, there needs to be a quadri-partite relationship between the council, Home Office, the accommodation provider, and the Welsh Government. The voluntary and community sector is also a key partner and should be appropriately engaged early on in discussions around the opening of new areas for asylum dispersal, and in ongoing support that may be required.

- g) **Council influence and control:** Councils must have a voice that is heard and must be able to influence the management of asylum dispersal at the local level; where there are reasonable grounds for concern, councils must be able to have the final say on procurement of properties and their suitability.
- h) **Funding for councils and SMPs:** Funding post March 2023 is a matter that needs urgent resolution, to enable councils to plan and prepare to be asylum dispersal areas. Funding for new bedspaces announced as part of Full Dispersal is welcome, but costs are ongoing and long term, and these must be covered by the Home Office. In summary:
 - I. Post 2023, there should be sustainable funding to councils, which reflects the costs, pressures, and impact of asylum dispersal in the UK. Councils also incur costs because of asylum dispersal and move-on, when positive or negative decisions on asylum claims are made, and these impacts should also be considered when assessing New Burdens.
 - II. Councils should establish clear processes for monitoring spend on responding to asylum dispersal and its impacts on local services and communities.
 - III. SMPs should be appropriately funded to enable a continued multi-agency and partnership approach to asylum dispersal, and the maintenance of an operational and strategic overview.
- i) **Equity and fairness:** procurement of accommodation will be distributed across council areas in a fair and equitable way as far as is possible, in line with the agreed plan, and taking into consideration existing local pressures and the availability of appropriate support services.
- j) **Effective data sharing processes:** Councils and Welsh Government will need a range of regular management information and data to ensure they are able to effectively manage and maintain an overview of asylum dispersal and its impacts at the local level. In addition to operational information that will be shared, it is expected that high level data and management information will also be shared with Local Authority Chief Executives and Heads of Housing, as well as Welsh Government, to monitor progress and maintain an overview at a senior level.

5. Key Operational Principles

5.1 The following operational principles have been agreed with and are supported by councils as ways in which they wish asylum dispersal to take place in their local areas:

- a) **A phased approach and preparatory period:** for many councils, involvement in asylum dispersal is new and it may take some time for numbers of asylum seekers to grow. A period to help prepare for asylum dispersal should be agreed when discussions commence on opening new areas, with early and effective engagement and consultation between the Home Office, accommodation provider and the individual council, supported by WSMP, utilising the WSMP [Asylum Dispersal Toolkit](#) as a framework for action.

b) **Local agreements in place:** Councils, the Home Office, and the accommodation provider should discuss and agree the following elements:

- i. Consideration of the wider migration context, including council support for Resettlement, Unaccompanied Asylum-Seeking Children (UASC), the support provided to people from Ukraine and the presence of other migrant groups in a locale.
- ii. Discussion on the number and demographic profile of asylum seekers likely to be accommodated, with likely timescale and considering wider community cohesion considerations, including the wider socio-economic circumstances of a local area and the make-up of local communities.
- iii. Agree process and reasons to notify the council about contentious or novel operational issues and escalation procedure to follow.
- iv. Process to be followed where individuals become Appeal Rights Exhausted in the community (e.g., offer other forms of support where eligible, for example, 'section four' support) and options for people who are appeal rights exhausted (including information on returns processes).
- v. Lines of communication between all stakeholders, and particularly between the council and Clearsprings Ready Homes, including emergency contacts.
- vi. Local agreements should be provided to the Welsh Government for wider awareness of proposals.

c) **Compliance with Home Office contracts:** the accommodation provider will ensure that the identified accommodation to be procured is appropriate for the needs of the Service User, including - but may not be limited to:

- I. the availability and concentration of accommodation of the required configuration, size and design, the cultural compatibility of the environment, the capacity of local health, education, ESOL and other support services.
- II. the absence of any reported social tension incidents at the time of allocation and the level of risk of increased social tension if Service User numbers increase within the relevant area.

d) **Procurement principles:** If a council area is at 75% or above of their allocated number of asylum seekers accommodated in their area, dispersal should move to another area which is below 75%. The well-established 1:200 ratio of asylum seekers to general population (cluster limits) in council areas will be the maximum at ward level unless there is mutual and ongoing agreement between the council and CRH to operate otherwise.

- i. CRH and their agents will procure property in a manner that will not cause rental price escalation or undermine efforts to tackle rogue landlords and agents. CRH will only use landlords who are registered under [Rent Smart Wales](#).
- ii. CRH and/or their agents will only procure properties that meet all minimum quality standards required by the Welsh Housing Quality Standards and any local licensing requirements and undertake property inspections prior to the property 'going live' to ensure it meets the standards required.

- iii. CRH and Home Office will adhere to Senedd Cymru legislation and Welsh Government policies with respect of housing and planning legislation.
- iv. Safeguarding: CRH will ensure appropriate accommodation is made available to ensure adults at risk or with specific needs¹ are safeguarded appropriately.
- v. CRH will ensure that there is no forced room sharing of unrelated adults in any property used in Wales.
- vi. CRH will undertake monthly, in person welfare checks, and monthly maintenance checks, as required by the contract.

e) **Contingency accommodation (hotels or large-scale sites):** it is expected that the procurement and management of any contingency accommodation will be undertaken in partnership with the affected council and the Welsh Government:

- I. Councils, WSMP and the Welsh Government will receive early and detailed information on site location, planned numbers and timing if contingency plans are to be utilised in times of high demand.
- II. CRH and Home Office will provide assurance to Welsh Government that devolved policies will be unaffected by plans for contingency or large-scale accommodation sites, including access to education and health settings and maintenance of cohesive communities.
- III. The WSMP and Welsh Government should be kept informed of numbers of people, turnover and exit strategies from contingency, to maintain national oversight of the system, as well as sharing such information with the council to manage any impacts at the local level.
- IV. CRH and Home Office will adhere to Senedd Cymru legislation and Welsh Government policies with respect of housing and planning legislation.
- V. Hotel numbers in Wales should reduce in response to asylum dispersal bedspaces increasing.

f) **Pausing and review of dispersal:** In local areas, where deemed appropriate, a temporary pause of dispersal (for example, to ease pressures on local services or address a particularly serious issue), should be agreed between the relevant Local authority, the Police, and the Home Office. The agreement should be subject to periodic review, agreed by statutory partners.

6. National plan delivery of full asylum dispersal in Wales

6.1 The preliminary national plan for delivery of full asylum dispersal in Wales has been based on a proportionate allocation of asylum seekers to each local council aligned to a national population share. Figures shown are illustrative of two different approaches - one which allocates the additional numbers of asylum seekers to be accommodated in Wales across all councils, and another metric which excludes the established dispersal areas. Councils need further time to

¹ Threats of suicide/self-harm, Domestic violence/ gender-based violence. Victims of Modern Slavery. Female Genital Mutilation. Lesbian, Gay, Bi-sexual, Trans and Intersex, Mental Health conditions, Physical Disability. Victims of torture or degrading and inhumane treatment.

discuss and agree whether and to what extent established dispersal areas should be included in this plan.

6.2 At the request of WSMP, Data Cymru have prepared some modelling to reflect how a population share would impact on each council as set out in Table A below.

Table A: 22 LAs					
Local authority	Population	Number of people	Max number based on 200:1 ratio	75% of 200:1	
Isle of Anglesey	69,751	53		349	262
Gwynedd	121,874	93		609	457
Conwy	115,228	88		576	432
Denbighshire	93,734	72		469	352
Flintshire	152,506	117		763	572
Wrexham	134,844	103		674	506
Powys	132,976	102		665	499
Ceredigion	75,922	58		380	285
Pembrokeshire	122,439	94		612	459
Carmarthenshire	183,777	141		919	689
Swansea	239,023	183		1,195	896
Neath Port Talbot	139,812	107		699	524
Bridgend	139,178	106		696	522
Vale of Glamorgan	126,336	97		632	474
Cardiff	346,090	265		1,730	1,298
Rhondda Cynon Taf	234,410	179		1,172	879
Merthyr Tydfil	58,802	45		294	221
Caerphilly	178,806	137		894	671
Blaenau Gwent	69,814	53		349	262
Torfaen	91,075	70		455	342
Monmouthshire	91,323	70		457	342
Newport	145,736	112		729	547
Wales	3,063,456	2,344		15,317	11,488

6.3 Table B below reflects the population share, but with not including the established dispersal areas, therefore

Table B: 19 LAs (no Cardiff, Swansea or Newport)					
Local authority	Population	Number of people	Max number based on 200:1 ratio	75% of 200:1	
Isle of Anglesey	69,751	70		349	262
Gwynedd	121,874	122		609	457
Conwy	115,228	116		576	432
Denbighshire	93,734	94		469	352
Flintshire	152,506	153		763	572
Wrexham	134,844	136		674	506

Wales Asylum Dispersal Pre-Indicative Plan, September 2022

Powys	132,976	134	665	499
Ceredigion	75,922	76	380	285
Pembrokeshire	122,439	123	612	459
Carmarthenshire	183,777	185	919	689
Neath Port				
Talbot	139,812	140	699	524
Bridgend	139,178	140	696	522
Vale of				
Glamorgan	126,336	127	632	474
Rhondda Cynon				
Taf	234,410	236	1,172	879
Merthyr Tydfil	58,802	59	294	221
Caerphilly	178,806	180	894	671
Blaenau Gwent	69,814	70	349	262
Torfaen	91,075	92	455	342
Monmouthshire	91,323	92	457	342
Wales	2,332,607	2,344		

6.4 Table C sets out the current dispersal of asylum seekers across Wales at this current time as a baseline.

Table C: Current figures	
Local authority	
Isle of Anglesey	0
Gwynedd	0
Conwy	6
Denbighshire	0
Flintshire	0
Wrexham	144
Powys	0
Ceredigion	0
Pembrokeshire	0
Carmarthenshire	0
Swansea	904
Neath Port Talbot	0
Bridgend	0
Vale of	
Glamorgan	0
Cardiff	1,475
Rhondda Cynon	
Taf	5
Merthyr Tydfil	0
Caerphilly	3
Blaenau Gwent	0
Torfaen	0
Monmouthshire	0
Newport	483
Wales	3,020

6.5 The Tables consist of:

- The 22 local councils.
- The population share based on the 2011 Census.
- The proportionate number of asylum seekers for each local council based on an estimated national allocation of 2,344 people between September 2022 and December 2023
- One column reflects the maximum number of people based on the 200:1 ratio.
- The final column in Table A covers 75% of the 200:1 ratio. If a local council reaches the 75% figure, allocations will be made to other councils. Consideration will need to be given to whether this also applies at ward level.
- Table B also covers the permutation of 19 local councils without Cardiff, Swansea and Newport who are close to the 75% figure, and Table C which sets out current numbers of dispersed asylum seekers.
- The spreadsheet embedded below also has a tab with population data based on the 2011 Census, the 2021 Census and the Mid-Year Population Estimates, to demonstrate different available metrics. Note that the Home Office has based its allocations on 2011 census data.



WSMP dispersal
calcs.xlsx

6.6 The Home Office's accommodation provider in Wales for full dispersal, Clearsprings Ready Homes, has produced a spreadsheet progress report on widening dispersal in Wales, which also sets out their plan/timescale for increasing the involvement of all councils.



Copy of Progress
report Widening Disp

SUs in Dispersal Accommodation	Phase 1-3	Apr-22	May-22	Jun-22	Jul-22	1 in 200 max	Pipeline Bedspaces	Market Data Bedspaces - Dec 2022	Market Data Bedspaces - Dec 2023	Total	Regional Allocation	Regional Allocation minus CRH Market data
Local Authority												
Blaenau Gwent	1	0	0	0	0	346	61	15	40	55	53	-2
Bridgend	2	0	0	0	0	684	0	40	65	105	106	1

Wales Asylum Dispersal Pre-Indicative Plan, September 2022

Caerphilly	1	6	6	6	6	889	24	50	80	130	137	7
Cardiff	3	1253	1456	1521	1475	1673	24	50	200	250	265	15
Carmarthenshire	1	0	0	0	0	906	9	80	70	150	141	-9
Ceredigion	3	0	0	0	0	357	0	30	35	65	58	-7
Conwy	1	6	6	6	6	563	0	45	50	95	88	-7
Denbighshire	3	0	0	0	0	462	0	30	45	75	72	-3
Flintshire	1	0	0	0	0	758	0	60	60	120	117	-3
Gwynedd	1	0	0	0	0	590	6	50	50	100	93	-7
Isle of Anglesey	3	0	0	0	0	345	0	30	30	60	53	-7
Merthyr Tydfil	2	0	0	0	0	292	0	25	25	50	45	-5
Monmouthshire	1	0	0	0	0	448	0	45	30	75	70	-5
Neath Port Talbot	2	0	0	0	0	693	5	45	65	110	107	-3
Newport	3	481	491	485	483	721	24	30	80	110	112	2
Pembrokeshire	1	0	0	0	0	603	0	45	50	95	94	-1
Powys	1	0	0	0	0	655	0	45	60	105	102	-3
RCT	1	5	5	5	5	1159	23	80	100	180	179	-1
Swansea	3	886	896	910	904	1172	24	0	185	185	183	-2
Vale of G	1	0	0	0	0	621	0	55	45	100	97	-3
Torfaen	1	0	0	0	0	452	4	25	50	75	70	-5
Wrexham	3	139	140	144	144	666	24	70	40	110	103	-7

- Bed spaces will be sourced and managed by Clearsprings Ready Homes in liaison with local councils.
- A phased approach of green, orange and red has been adopted. Green - bed space allocation active; orange - bed space allocations imminent; red bed space allocations under consideration for future delivery.
- The table also sets out on a local council basis:
 - bed spaces in the pipeline
 - Market data bed spaces up to December 2022.
 - Market data bed spaces January 2023 to December 2023.
 - The regional allocation.
 - The difference between the regional allocation and Clearsprings Ready Homes assessment of the housing market.

6.7 Please note that both tables above set out the parameters of a pre-indicative plan. The opportunity for future revision will need to take into account any additional factors. It is important to revisit the market estimates, whilst considering other housing pressures including the existing homeless cohort in temporary accommodation and the needs of both Ukrainian and Afghan cohorts, amongst others.

7. Challenges and limitations to the plan

7.1 WSMP has undertaken a range of engagement with councils, Clearsprings Ready Homes, Welsh Government, and others in developing this plan in a relatively short period of time, however, there are some challenges, risks and limitations that need to be highlighted. The plan has also been developed and will be delivered in the midst of a significant amount of policy change and ambiguity for the sector, which could affect the successful delivery of the plan in the future:

- a) **Formal political approval:** the plan has been required to be developed during the summer holiday period. Many councils do not hold formal decision-making meetings during this time, and therefore the plan has not received formal approval and agreement at either the local or national levels. It is anticipated that officers will be able to fully brief their councils and Welsh Ministers during September and the plan will also be presented to the WLGA Executive Board (made up of all council leaders) at the end of September 2022.
- b) **Nationality and Borders Act 2022:** The plan does not consider the impact of any proposed accommodation centres and what this means for Wales. There are other aspects of the Act, such as impacts on 'group 2 refugees' (implications for people arriving via channel/small boats, for example), that may impact on how asylum dispersal is managed or delivered at the local level and across Wales which are not yet known. Early discussions on any part of the Act that may impact in Wales will be needed at the appropriate time.
- c) **Services.** There are concerns as to how to enable access to services across Wales, with transport issues and provision outside of current dispersal areas mainly only available remotely at this stage, and a severe lack of legal advice provision (which is limited to three providers). This is alongside increasing pressures for the legal advice sector, including the need to provide advice to Unaccompanied Asylum-Seeking Children dispersed to Wales under the UK Government National Transfer Scheme.
- d) **Home Office work on developing a place-based approach (PBA):** This plan is focused on asylum dispersal, however, in the longer term, the view of many councils is that a future plan should be set within a more place-based approach would be beneficial, with a PBA providing an opportunity to streamline all aspects of the asylum and immigration system, with the aim of balancing the various migration demands on a local authority, whilst also achieving a fairer and more equitable asylum dispersal system.
- d) **Significant challenges in housing availability:** there are a range of housing related challenges that may affect asylum dispersal in Wales, including the low level of accommodation in the private rented sector and the level of homelessness and people already in temporary accommodation. More recently, the need for housing for those arriving from Ukraine, as part of a humanitarian effort, is having a significant impact on housing availability and the ability to find and secure appropriate accommodation for all those arriving. While significant work is ongoing to identify and deliver various solutions and

more appropriate housing, including additional funding from Welsh Government, the challenge to find appropriate housing should not be underestimated. Councils have welcomed the commitment from Clearsprings Ready Homes to work closely with them and Welsh Government in ensuring competition for properties is avoided and in not destabilising the private sector rental market.

e) **Longer-term impacts of asylum dispersal:** Once decisions on asylum claims have been decided by the Home Office, whether those decisions are positive or negative, there are impacts for councils to address. For example, the 28 days move on time before newly recognised refugees are required to vacate their accommodation and may apply to the council for housing or the 21 days move on time for a refused asylum seeker to seek alternative support. These longer-term impacts of being an asylum dispersal area should be monitored and if required, further discussions at a national level.

8. Supporting structures and governance, including a review process

8.1 Subject to formal agreement of the plan through the WLGA, there are various structures that will be involved in maintaining an overview of how full asylum is operating in practice at UK and Wales level, as well as arrangements councils will put in place locally to do the same. These include:

- **UK Asylum Board:** We understand this will be a cross government group to be established by the Home Office
- **Home Office and Local Government Chief Executive Group (HOLGCEG):** The purpose is to enable senior local government oversight of dispersal across the UK. Membership includes Chief Execs, SMPs, Home Office, LGAs.
- **Wales Asylum Board:** – Chair, Newport Council Chief Executive. Purpose, senior level oversight of dispersal in Wales, local government, Welsh Government, Home Office, and Clearsprings Ready Homes.
- **Wales Refugee and Asylum Taskforce** – Chair, Welsh Minister for Social Justice. Purpose, Ministerial oversight of integration of people seeking sanctuary in Wales. Membership – Welsh Government, local government, WSMP, Home Office, Health Boards, Police Forces, Third Sector, Faith sector etc.
- **WSMP Dispersal Strategy Group** – comprised of representatives from all Wales councils, Home Office and CRH. Meet monthly to review the Wales Dispersal Plan and inform/escalate issues to Wales Asylum Board, Welsh Government.
- **WSMP Executive Board.** Chair WLGA Spokesperson. Purpose, senior oversight of migration in Wales (all cohorts). Membership, Home Office, WLGA, Welsh Government, Elected Members and senior officers, Migrant Help, Third Sector.
- **Wales Asylum and Migration Forum;** Chair. WSMP. Operational delivery, cross cutting issues arising from migration. Members, Home Office, Welsh Government, third sector, CRH, Migrant Help.
- **WLGA governance structures:** it is proposed that regular updates will be provided to members to maintain a strategic overview and to discuss and

approve any proposed changes to the plan as proposed by the Wales Asylum Board

8.2 As set out above, it is proposed that the plan will be regularly reviewed and assessed against delivery. Any significant changes required or requested, or to develop a different model for distribution of asylum seekers should councils wish to do so, or as part of the Home Office plans to develop a more Place Based Approach across all asylum, refugee, and migration issues, will be discussed and agreed by leaders through the WLGA, following discussions with all relevant stakeholders and through the Wales Asylum Board.

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