

7 November 2025

Dear ,

## **ATISN 26247 – Nation of Sanctuary Expenditure**

### **Information requested**

Thank you for your request which I received on 13 October 2025. You asked for:

1. A full financial breakdown of the £54.88 million / £55 million total expenditure attributed to the Nation of Sanctuary policy from March 2019 to March 2025, itemised by:
  - a. Financial year;
  - b. Funding stream or programme;
  - c. Purpose of expenditure (e.g. accommodation, wrap-around support, legal advice, community grants, staffing, administration, etc.); and
  - d. Delivery organisation or body (e.g. local authorities, third-sector partners, Welsh Government departments).
2. Within that total, a separate breakdown of the £45.475 million allocated to support refugees from Ukraine, detailing expenditure on:
  - a. Accommodation (including Welcome Centres and hotel contracts);
  - b. Wrap-around services (education, health, interpretation, transport, etc.);
  - c. Local authority payments;
  - d. Third-sector support and grants; and
  - e. Administration or overhead costs.
3. Any internal or published documents (such as annexes, audit schedules, or grant summaries) that verify or record this total expenditure.

### **Our response**

A copy of the information I have decided to release is enclosed at **Annex 1**.

#### ***Information requested: Questions 1 & 2***

I have decided that some of the information requested within Questions 1 & 2 is exempt from disclosure under section 38 of the Freedom of Information Act and is therefore withheld. The reasons for applying this exemption are set out in full at **Annex 2** to this letter.

#### ***Information requested: Question 3***

I have also decided that the information requested under Question 3 will cost more than the appropriate limit set out in the Freedom of Information and Data Protection

(Appropriate Limit and Fees) Regulations 2004 to answer your request. The appropriate limit specified for central government is £600. This represents the estimated cost of it taking over 24 hours of time to determine whether we hold the information and to thereafter locate, retrieve and extract it.

In order to provide you with the information that you have requested, it would require searches of 6 years' worth of financial documents and an electronic search for the information within the parameters you have given will return many records, some of which will not be relevant to your request, if at all.

A preliminary search of Ukraine-related financial documents only identified 1,235 results. At an estimate of taking 2 minutes to investigate each document to see if it contains any relevant information and to then extract it would take in excess of 24 hrs for this exercise alone. Consequently, I have decided not to provide you with the information you have requested within Question 3.

You may wish to refine your request by narrowing its scope by being more specific about what information you particularly wish to obtain, including any dates or period of time relevant to the information required. If you do refine your request in this way, this will be treated as a new request.

### **Next steps**

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit,  
Welsh Government,  
Cathays Park,  
Cardiff,  
CF10 3NQ

or Email: [Freedom.ofinformation@gov.wales](mailto:Freedom.ofinformation@gov.wales)

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office,  
Wycliffe House,  
Water Lane,  
Wilmslow,  
Cheshire,  
SK9 5AF.

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely,

## Annex 1

### *Welsh Government net expenditure*

Since the Nation of Sanctuary Plan was first published in 2019, the **net expenditure** from 1 April 2019 to 31 March 2025 for the Welsh Government on the Nation of Sanctuary policy is as follows:

<b>Table 1. Welsh Government net expenditure on Nation of Sanctuary policy over 6 years (Financial Year 2019-2025)</b>		
<b>Financial year</b>	<b>Total net expenditure per financial year (£000s)</b>	<b>Cumulative year on year net total (£000s)</b>
2019-2020	510	510
2020-2021	91	601
2021-2022	655	1,256
2022-2023	26,334	27,590
2023-2024	31,648	59,238
2024-2025	4,635	63,873

### *Breakdown of net Welsh Government expenditure*

The table below sets out the net Welsh Government expenditure per area of the Nation of Sanctuary policy, from 1 April 2019 – 31 March 2025. These figures are approximate.

<b>Table 2. Breakdown of Welsh Government expenditure on Nation of Sanctuary policy over 6 years (Financial Year 2019-2025)</b>	
<b>Activity area</b>	<b>Expenditure from 1 April 2019 to 31 March 2025 (£000s)</b>
Ukraine response, including <ul style="list-style-type: none"><li>Accommodation &amp; wraparound support</li><li>Support for local authorities</li><li>Support for hosts within communities</li></ul>	58,215
Support and integration services – asylum seekers and refugees, including <ul style="list-style-type: none"><li>Wales Sanctuary Service</li><li>English language support</li><li>Pathways into further education and work</li><li>Support for move-on accommodation</li><li>Family Reunion support</li></ul>	4,048
Support services – Planned migration & EU citizens, including <ul style="list-style-type: none"><li>Migrant Integration Wales Framework</li></ul>	610

<ul style="list-style-type: none"> <li>• Immigration legal advice support</li> <li>• EU Settlement Scheme advice</li> </ul>	
One off donation to the Community Foundation Wales Croeso Fund (March 2022) to support Ukrainians, asylum seekers and refugees in Wales.	1,000
<b>Total over 6 years</b>	<b>63,873</b>

#### *Income from the UK Government*

The table below sets out total UK Government income from 1 April 2022 – 31 March 2025:

<b>Table 3. Income from UK Government on Ukraine response (Financial Year 2022-2025)</b>		
<b>Financial year</b>	<b>Total income per financial year (£000s)</b>	<b>Cumulative year on year total (£000s)</b>
2022-2023	74,400	74,400
2023-2024	18,631	93,031
2024-2025	6,427	99,458

#### *Welsh Government net expenditure – Ukraine*

The **net expenditure** for the Welsh Government between 2022 – 2025 on the Ukraine response, broken down by type of expenditure is as follows:

<b>Table 4. Welsh Government net expenditure on the Ukraine response by type of expenditure (Financial Year 2022-2025)</b>	
<b>Type of expenditure</b>	<b>Net cost for Welsh Government (000s)</b>
Contact Centre	4,817
Data Platform	1,089
DBS checks	12
Hosting support	230
Local Authorities	2,926
Marketing	69
Procured Booking Agent	41,497
Staffing	685
Translation	217
Transport	113
Welcome Accommodation	6,560
<b>Grand Total</b>	<b>58,215</b>

## **Annex 2**

### **Application of exemptions/exceptions**

The Freedom of information Act/Environmental Information Regulations provide a right for anyone to ask a public authority to make requested information available to the wider public. As the release of requested information is to the world, not just the requester, public authorities need to consider the effects of making the information freely available to everybody. Any personal interest the requester has for accessing the information cannot override those wider considerations.

I have decided to withhold the following information:

- Organisation names for those who expressed Health and Safety concerns under **section 38** of the Freedom of Information Act.

This Annex sets out the reasons for the engagement of section 38 of the Freedom of Information Act and our subsequent consideration of the Public Interest Test.

### **Engagement of section 38 (Health and Safety) of the Freedom of Information Act**

This exemption states:

(1) Information is exempt information if its disclosure under this Act would, or would be likely to—

- (a) endanger the physical or mental health of any individual, or
- (b) endanger the safety of any individual.

The Commissioner's Guidance on s38 states (inter alia):

Section 38 provides an exemption from disclosing information if it would endanger any individual (including the applicant, the supplier of the information or anyone else). The exemption does not necessarily deal with what are usually thought of as health and safety matters, such as establishing the cause of an accident.

The Welsh Government believes that the organisation names for those who expressed Health and Safety concerns should be exempt from disclosure due to the targeting and direct abuse of certain organisations linked to the Welsh Government's Nation of Sanctuary policy.

### **Public Interest Test**

In order to satisfy the public interest test in relation to the exemption(s), it is necessary to conclude that the public interest arguments in favour of withholding the information are sufficient to *outweigh* the public interest arguments in favour of release.

### **Public interest arguments in favour of disclosure**

The Welsh Government acknowledges the general public interest in openness and transparency that release of this information would engender. Further, we recognise there is a public interest in supporting the public to better understand the Nation of Sanctuary policy.

### **Public interest arguments in favour of withholding**

Officials have received evidence detailing how involvement with supporting refugees and asylum seekers in Wales has led to online misinformation, targeting and abuse. This clearly evidences the harms that releasing this information may have on individuals.

Third sector organisations have been targeted for abuse, both online and via threats, and the disclosure of this information is likely to escalate issues, resulting in the endangerment of both the physical/mental health of funded organisation staff, as well as endangering their safety.

### **Balance of public interest test**

The Welsh Government can see no public interest in such an outcome and so believes the public interest favours withholding under the above stated exemption.