

21/11/2025

Dear

ATISN 26299

Information requested

Thank you for your request which we received on 26/10/2025. You asked for:

- 1) Any current or planned contracts, agreements, or proposals (formal or informal) to use hotels, B&Bs, hostels, or other short-term accommodation in Pembrokeshire for housing asylum seekers, refugees, recent migrants, or individuals granted leave to remain.
- 2) The names and addresses of any such accommodation providers that are currently being used, or have been used since 1 January 2023, for these purposes. The start and end dates of any existing or planned arrangements.
- 3) The total number of individuals currently housed in this way, broken down by accommodation site.
- 4) Any correspondence between Pembrokeshire County Council, the Home Office, the Welsh Government, or private contractors (such as Clearsprings Ready Homes) relating to the above.

You requested that if no such arrangements exist, we confirm this explicitly.

Finally, you requested that the information be provided in electronic format, and to provide all non-exempt material.

Our response

A copy of the information we have decided to release is set out in **Annex 1**.

Information requested: Questions 1 and 3

Following a search of our paper and electronic records, we have established that the information you require is not held by the Welsh Government.

Please note that immigration policy, including the asylum system and asylum accommodation, are matters reserved to the UK Government. You can make a Freedom of Information request to the UK Home Office by email to foirequests@homeoffice.gov.uk

Information requested: Question 2

We have decided that some of the information requested within Question 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 4

Following an initial search for the information requested, the time to locate, retrieve and review each piece of information would exceed the appropriate limit set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004. 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.

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 electronic search of email exchanges only identified 1,368 results. This included a search for emails containing:

- Pembrokeshire Council's email address and the names of the accommodation sites used for Ukrainians
- The names of the contractors used to manage the accommodation booking for Ukrainians.
- Pembrokeshire Council's email address and the term "asylum"
- Pembrokeshire Council's email address and the term "refugees"

At an estimate of taking 2 minutes to investigate each document to see if it contains any relevant information and to then extract, we believe would take at least 45.5hrs for this exercise alone. Consequently, we have decided not to provide you with the information you have requested within Question 4.

You may wish to refine your request by narrowing its scope by being more specific about what information you particularly wish to obtain. It may help if you draft a more refined request if you think about what it is you want to know, the questions you want answers to, and focus your request on that information rather than focusing on where you think the information may be held. Any refined request 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

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.

Website: www.ico.org.uk

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

Question 2

Since 1 January 2023, the Welsh Government funded two accommodation sites to provide initial accommodation for Ukrainians arriving under the UK Government's Homes for Ukraine Scheme via the Welsh Government's Super Sponsor route.

One site accommodated Ukrainians from June 2022 until March 2023. Another site accommodated Ukrainians from October 2022 until February 2024.

Both sites have now closed for this purpose.

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.

We have decided to withhold the following information:

- The names and addresses of accommodation providers that have been used since 1 January 2023 to accommodate Ukrainians, 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 provided accommodation for Ukrainians should be exempt from disclosure due to the targeting and direct abuse of organisations linked to the Welsh Government's Nation of Sanctuary policy.

There are also numerous well documented cases of disorder at sites across the UK housing, or thought to be housing, people seeking sanctuary, including attempted arson, etc. We believe that identifying those involved in housing people seeking sanctuary would be putting the health and safety of not just those being temporarily housed but also staff, the local community, the police and other emergency service workers at real risk.

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

The Welsh Government recognises the general public interest in avoiding prejudice and harm to individuals, which could arise if this information was released. There is a public interest to protect staff and residents at the accommodation, local service and communities. Withholding the information would avoid potential escalation of such risks.

Balance of public interest test

The Welsh Government can see no public interest in allowing prejudice to occur and putting people at risk and so believes the public interest favours withholding under the above stated exemption.