

5 December 2025

Dear

**ATISN 26352: Nation of Sanctuary Expenditure – Detailed Breakdown of Key Contracts and Payments**

Thank you for your request which we received on 07/11/2025. You sent a refined request for recorded information under the Freedom of Information Act 2000, following your previous request under reference ATISN 26247.

Specifically, you asked to narrow the scope of your request for information to the highest-value areas of expenditure only, for the financial years 2022-23, 2023-24, and 2024-25 only and to include:

1. Procured Booking Agent Contracts  
The name(s) of all supplier(s) or contractor(s) engaged as “Booking Agent” or equivalent under the Ukraine response element of the Nation of Sanctuary programme.  
The total value of each contract, including start and end dates.  
A short description of the services provided (e.g. hotel procurement, accommodation management, etc.)
2. Welcome Accommodation Contracts  
The names and contract values of any companies or organisations commissioned to operate “Welcome Centres” or other forms of temporary accommodation for refugees or asylum seekers in Wales.
3. Third-Sector and Community Support Grants  
A list of third-sector or community organisations that received grant or support funding from the Nation of Sanctuary policy between 1 April 2022 and 31 March 2025, including the amount awarded and a brief description of purpose.
4. Supporting Documentation  
Copies of any summary schedules, ministerial submissions, or internal briefing notes that record or verify the above contracts and grants (where these can be retrieved within the appropriate cost limit).

You asked that, if parts of this refined request still risk exceeding the statutory cost limit, we process the portion(s) that can be provided within the limit, beginning with Sections 1 and 2 above.

## **Our Response**

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

### ***Information requested: Question 1***

I have decided that some of the information requested within Question 1 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 2***

I 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.

Please note that immigration policy, including the asylum system and asylum accommodation, are matters reserved to the UK Government. Information regarding the names and contract values of any companies or organisations commissioned to operate temporary accommodation for refugees and asylum seekers is not held by Welsh Government as this is procured by UK Government.

You can make a Freedom of Information request to the UK Home Office by email to [foirequests@homeoffice.gov.uk](mailto:foirequests@homeoffice.gov.uk)

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

I have decided that the information requested within Question 3 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 of the Welsh Government's internal system 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 documents containing the names of the contractors used to manage the accommodation booking for Ukrainians between 1 April 2022 and 31 March 2025 identified 5726 results.

At an estimate of taking 2 minutes to investigate each document to determine if it contains any relevant information to your request and to then extract, would take at least 190 hours. Consequently, I have decided not to provide you with the information you have requested within Question 4.

### **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.

Website: [www.ico.org.uk](http://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

Some of the information you have requested is already available in the response to your previous request for information, issued 7 November 2025: [FOI release 26247: Nation of Sanctuary | GOV.WALES](#).

### Question 1

#### *Procured Booking Agent Contracts*

Table 1 – Procured Booking Agent Contracts			
	Period	Services provided	Total funding
Procured Booking Agent 1	June 2022 – September 2023	Hotel procurement, booking accommodation	£35,511,863.98
Procured Booking Agent 2	September 2023 – March 2025	Hotel procurement, booking accommodation	£5,984,809.49
Total			£41,496,673.47

### Question 2

#### *Welcome Accommodation Contracts*

Some of the information you have requested is already publicly available:

[Contract Award Notice - Sell2Wales](#) – published 6 May 2022.

The table below shows the total cost of Welcome Centres that were booked, managed and paid for directly by the Welsh Government. This includes the information already publicly available, above.

Table 2 – Welcome Centres: Welsh Government					
	2021-22	2022-23	2023-24	2024-25	Total
Welcome Centres: Welsh Government	£14,950	£6,404,485.94	£203,673.28	-£62,773	£6,560,336.22

The table below shows the total cost of Welcome Centres that were booked and managed by Local Authorities. These costs were reimbursed by the Welsh Government.

Table 3 – Welcome Centres: Local Authorities				
	2022-23	2023-24	2024-25	Total
Welcome Centres: Local Authorities	£15,685,753.21	£3,939,716.66	£898,826.70	20,524,296.57

The table below shows a split of the above costs by Welcome Centre.

<b>Table 4 – Welcome Centre costs split</b>					
	<b>2021-22</b>	<b>2022-23</b>	<b>2023-24</b>	<b>2024-25</b>	<b>Total</b>
Welcome Centre 1 –	-	£5,661,575	-	-	£5,661,575
Welcome Centre 2 –	-	£1,135,845	£252,506	-	£1,388,351
Welcome Centre 3 – Cardiff	-	£1,729,740	£1,164,216	-	£2,893,956
Welcome Centre 4 –	-	£446,710.06	-	-	£446,710.06
Welcome Centre 5 –		£1,670,900.94	£313,712	-	£1,984,612.94
Welcome Centre 6 –		£4,831,120.34	£721,943.50	-	£5,553,063.84
Welcome Centre 7 –		£1,158,101.20	£768,396.68	-	£1,926,497.88
Welcome Centre 8 –	£14,950	£431,488	-	-	£446,438
Welcome Centre 9 –	-	£1,356,318	£61,488	-	£1,417,806
Welcome Centre 10 –		£651,050.72	£352,095.20	-	£1,003,145.92
Welcome Centre 11 –	-	£488,243.24	-	-	£488,243.24
Welcome Centre 12 -	-	£114,518.88	-	-	£114,518.88
Welcome Centre 13 -	-	£528,465.95	-£239,484.89	£27,820	£316,801.06
Welcome Centre 14 –		£122,240	£219,200	-	£341,440
Welcome Centre 15 –	-	-	£162,799.50	£67,306.50	£230,106
Other Welsh Government-funded initial accommodation	-	£1,763,921.82	£366,517.95	£740,927.20	£2,871,366.97
<b>Total</b>	£14,950	£22,090,239.15	£4,143,389.94	£836,053.70	£27,084,632.79

### Question 3

Some of the information you have requested is already publicly available:

[FOI release 23300: Nation of Sanctuary Plan | GOV.WALES](#) – 10 February 2025

[FOI release 24359: Nation of Sanctuary | GOV.WALES](#) – 20 February 2025

[Written Question - WQ97534 - Welsh Parliament](#) – 6 November 2025

[Written Question - WQ94514 - Welsh Parliament](#) – 22 October 2024  
[Written Question - WQ94513 - Welsh Parliament](#) – 22 October 2024  
[Written Question - WQ93398 - Welsh Parliament](#) – 14 August 2024

## **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 under **section 38** of the Freedom of Information Act:

- The names of all suppliers or contractors engaged as “Booking Agent” or equivalent under the Ukraine response element of the Nation of Sanctuary programme.
- The names of any companies or organisations commissioned to operate “Welcome Centres” for Ukrainians.
- The names and/or locations of accommodation used as “Welcome Centres” for Ukrainians.
- The names of third sector or community organisations that received funding under the Nation of Sanctuary policy between 1 April 2022 – 31 March 2025.
- Details of contracts which are not already in the public domain, which could identify the names of third sector, community organisations and/or accommodation, as above.

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 booked or provided accommodation for Ukrainians or received grant or support funding from the Nation of Sanctuary policy 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.

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.

There are also numerous well documented cases across the UK where housing, or sites thought to be housing people seeking sanctuary, have experienced disorder or risk of disorder, including attempted arson. 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 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 and approach.

### **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 services, communities and staff working in the third sector. 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.