

19 December 2025

Dear

### **Information requested**

Thank you for your requests for information linked to the Welsh Government's Nation of Sanctuary policy which you sent between 5-8 December 2025 and which I received on 8 December. You also sent a further request on 18 December 2025 which I received on the same day.

The information which you requested within 21 separate requests for information during this period are detailed at Annex A.

### **Our response**

The total 21 requests for information you made linked to the Welsh Government's Nation of Sanctuary policy have been aggregated into this single response.

From my preliminary assessment I estimate that it 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 requests. 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 addition to these 21 current requests for information, within the last 60 working days you requested information regarding the Nation of Sanctuary policy under ATISN 26247, ATISN 26352 and ATISN 26353, to which we have responded. The average time spent responding to your previous requests was 8 hours per request.

The level of detail and information requested in your previous responses is similar to that requested in each of the 21 new requests for information. Based on the time taken to respond to your previous requests, in order to provide you with the information that you have requested would require 168 hours of officials' time. Consequently, I have decided not to provide you with the information you have requested.

You may wish to refine your request by narrowing its scope by being more specific about what information you particularly wish to obtain. Rather than asking for everything, or providing a description of where you think the information may be held (i.e. in correspondence, minutes, etc.) in the hope that it might contain what you are looking for, you may wish to think about what question(s) you want an answer to, what it is you are trying to find out and ask specifically for that information. If you do refine your request in this way, this will be treated as a new request.

You can find useful information on writing an effective request for information on the Information Commissioner's Office website: [How to write an effective request for information | ICO](https://ico.org.uk/for-organisations/guide-to-the-information-access-act/how-to-write-an-effective-request-for-information/)

## 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 A – Detail of information requested**

This annex sets out the information you requested between 5<sup>th</sup> – 8<sup>th</sup> December 2025 within requests for information relating to the Welsh Government's Nation of Sanctuary policy.

### **ATISN 26460 – 05/12/2025**

#### *Section A — Booking Agent Contracts*

1. Procurement evaluation criteria: the procurement scoring matrix, weighting, and criteria used to evaluate bids for:

- Booking Agent Contract 1 (June 2022 – September 2023)
- Booking Agent Contract 2 (September 2023 – March 2025)

2. Contract management documentation: for Booking Agent 1 and Booking Agent 2 any recorded documents setting out:

- performance indicators (KPIs)
- monitoring arrangements
- contract review points
- agreed deliverables

#### *Section B — Welcome Centres (Local Authority Managed)*

3. The reimbursement policy or guidance: any recorded guidance issued by Welsh Government to Local Authorities covering:

- eligibility criteria
- reimbursement procedure
- reporting requirements
- evidence Local Authorities must supply

4. Financial oversight documentation: any financial monitoring framework, audit checklist, or internal policy used by Welsh Government to verify the Welcome Centre expenditure before reimbursing Local Authorities.

#### *Section C — Third Sector Support Grants*

5. The grant award criteria used for Nation of Sanctuary third-sector funding (2022–2025).

6. Any internal guidance, framework, or process explaining how officers:

- assess applications
- score bids
- recommend awards

- verify delivery of outcomes

#### *Section D — Ministerial Oversight*

7. Any index, list, or log of ministerial submissions between 1 April 2022 – 31 March 2025 relating to:

- Booking Agent procurement
- Welcome Centres
- Third-sector grants
- Nation of Sanctuary Ukraine response

### **ATISN 26465 – 05/12/2025**

#### *Section A — Clarification of Expenditure Totals*

1. The internal financial definitions used for categorising Nation of Sanctuary expenditure. Specifically, the definitions or descriptions used by Welsh Government for categories such as:

- “Welcome Accommodation”
- “Third-Sector Support”
- “Booking Agent Costs”
- “Initial Accommodation”
- Any other internal category referenced in ATISN 26353.

#### *Section B — Internal Controls and Governance*

2. Any internal guidance, governance framework, or financial control documents used by Welsh Government officials overseeing the Nation of Sanctuary programme between 1 April 2022 – 31 March 2025, including documents relating to:

- financial approval thresholds
- grant-making controls
- contract oversight processes
- monitoring and assurance mechanisms

#### *Section C — Monitoring and Reporting*

3. Any high-level monitoring framework or reporting template used to measure delivery or performance under:

- Welcome Accommodation
- Third-Sector Support Grants
- Booking Agent contracts

#### *Section D — Ministerial Decision Records (Index Only)*

4. A list or index of ministerial submissions relating to Nation of Sanctuary expenditure for financial years 2022–23, 2023–24, and 2024–25, including:

- submission reference number
- title
- date submitted
- ministerial portfolio

#### *Section E — Financial Reconciliation Process*

5. Any internal checklist or procedure used to verify expenditure totals before publication or inclusion in responses to FOI requests such as ATISN 26353.

### **ATISN 26466 – 05/12/2025**

For the period 1 January 2019 to the present, relating to the Welsh Government's Nation of Sanctuary programme:

#### 1. Internal Briefings

Copies of any internal briefing notes, advice notes, or summary papers that relate to delivery, risks, costs, operational issues, or performance assessments of Nation of Sanctuary and prepared for:

- Ministers
- Deputy Ministers
- Director-level or above officials

#### 2. Risk Assessments

- Risk registers
- Risk assessments
- Mitigation plans

covering accommodation, safeguarding, financial pressures, community impact, or delivery risks linked to Nation of Sanctuary.

#### 3. Ministerial Advice & Decision Records

- Ministerial Advice submissions
- Decision logs
- Written Ministerial Directions
- Any “red flag” warnings raised by officials

relating to Nation of Sanctuary policy decisions or implementation issues.

#### 4. Communications with UK Government

Copies of correspondence between Welsh Government and:

- Home Office
- Department for Levelling Up, Housing & Communities
- Cabinet Office
- No.10
- UK Resettlement Scheme teams

concerning asylum accommodation, dispersal, funding allocations, safeguarding issues, or operational pressures.

#### **ATISN 26467 – 05/12/2025**

For the period 1 January 2019 to the present, information relating to safeguarding, welfare, and risk concerns arising within the Welsh Government's Nation of Sanctuary programme including:

##### 1. Safeguarding Incident Reports

Copies of any recorded safeguarding incident reports, logs, or notifications relating to:

- Asylum accommodation supported or funded by the Welsh Government
- Third-sector organisations delivering Refugee/Asylum support services
- Any safeguarding concerns raised by staff, partner bodies or service users

##### 2. Complaints & Escalations

- Complaints received by Welsh Government relating to safeguarding, welfare, exploitation, abuse, or accommodation concerns
- Any escalation reports or summaries prepared for senior officials or Ministers

##### 3. Internal Warnings & Risk Papers

- Warning notes
- Issues escalated to Ministers
- “Red flag” concerns
- Risk assessments relating to safeguarding
- Internal correspondence discussing safeguarding pressures or failures

##### 4. Correspondence with External Bodies

Copies of correspondence relating to safeguarding concerns between Welsh Government and:

- Home Office
- Local Authorities in Wales
- Accommodation providers
- Third-sector partners

## **ATISN 26468 – 05/12/2025**

For the period 1 January 2019 to the present, information relating to the financial management of the Welsh Government's Nation of Sanctuary programme:

### **1. Budget Pressures & Overspend Reports**

Copies of any internal reports, briefings, dashboards, or financial monitoring papers that refer to:

- Budget pressures
- Overspends
- Emerging or forecasted financial shortfalls
- Cost overruns
- Unfunded commitments
- Requests for in-year budget adjustments

### **2. Ministerial Advice on Financial Risks**

Copies of any Ministerial Advice submissions relating to:

- Funding pressures
- Risk of overspend
- Need for supplementary budgets
- Requests for Ministerial approval for emergency or additional funds
- Any Ministerial Directions or refusals.

### **3. Internal Financial Risk Assessments**

- Financial risk registers
- Risk assessments
- Mitigation plans
- “Red flag” warnings raised by finance officials

concerning the affordability, sustainability, or financial exposure of the Nation of Sanctuary programme.

### **4. Correspondence with HM Treasury or the Home Office relating to:**

- Funding allocations
- Shortfalls in UK reimbursement
- Negotiations over resettlement or asylum funding
- Financial disputes or escalations

## **ATISN 26469 – 06/12/2025**

For the period 1 January 2019 to the present, information relating to the involvement, influence, and engagement of third-sector organisations in the Welsh Government's Nation of Sanctuary programme:

### **1. Lobbying, Influence & Engagement**

Copies of any recorded:

- Lobbying communications
- Meeting notes or minutes
- Briefings supplied by external organisations
- Emails from third-sector groups seeking policy influence
- Records of stakeholder engagement events

relating to asylum accommodation, resettlement work, programme design, or operational decisions.

### **2. Funding Decisions & Assessment Papers**

- Internal scoring panels
- Assessment criteria
- Recommendations from officials
- Any Ministerial Advice on awarding or refusing grants
- Records showing why specific organisations were selected or prioritised for funding under Nation of Sanctuary.

### **3. Conflicts of Interest**

- Any declared conflicts of interest
- Internal correspondence discussing potential or perceived conflicts
- Steps taken to mitigate conflicts within funding panels, advisory boards, or working groups involving third-sector partners.

### **4. Correspondence with Named Organisations**

Copies of correspondence between Welsh Government and the following (and any similar partners involved in asylum/migration support):

- Welsh Refugee Council

- EYST
- Migrant Help
- British Red Cross
- Asylum Justice
- Any organisation receiving Nation of Sanctuary grants

relating to funding, operational issues, lobbying, or policy influence.

## **ATISN 26470 – 06/12/2025**

For the period 1 January 2019 to the present, information relating to procurement, contract oversight, and compliance within the Welsh Government's Nation of Sanctuary programme:

### **1. Procurement & Tendering Records**

Copies of any recorded information relating to:

- Procurement exercises
- Tender evaluation reports
- Scoring matrices
- Invitation-to-tender documentation
- Business cases or value-for-money assessments

for contracts awarded under Nation of Sanctuary, including accommodation, support services, advisory work, or grant administration.

### **2. Due-Diligence Checks**

- Due-diligence assessments
- Financial viability checks
- Governance assessments
- Fraud, risk, or reputational checks

carried out before awarding contracts or grants to external partners.

### **3. Contract Monitoring & Performance Management**

- Contract monitoring reports
- Provider performance reviews
- Compliance assessments
- Notices of under-performance or concern
- Any “improvement plans” issued to contractors or partners

relating to service delivery under Nation of Sanctuary.

#### 4. Breach Notifications & Escalations

- Breach notices
- Escalations to senior officials
- Termination warnings
- Records of contract variations or remedial agreements
- Internal correspondence discussing provider non-compliance

#### 5. External Regulators

Copies of correspondence with:

- Audit Wales
- Procurement Centre of Excellence
- Home Office
- Local authorities

relating to procurement risks, contract failures, or compliance concerns under Nation of Sanctuary.

### **ATISN 26471 – 06/12/2025**

For the period 1 January 2019 to the present, recorded communications relating to the Welsh Government's Nation of Sanctuary programme:

#### 1. WhatsApp Messages

Copies of any WhatsApp messages sent or received by:

- Ministers
- Deputy Ministers
- Special Advisers
- Senior officials (Director-level or above)

that discuss Nation of Sanctuary operations, decisions, risks, safeguarding issues, or third-sector involvement.

#### 2. SMS / Text Messages

Copies of any SMS/text messages held on government or personal devices used for government business relating to Nation of Sanctuary.

#### 3. MS Teams Chats

- MS Teams chat logs
- Group channel messages
- Direct messages between staff

where Nation of Sanctuary issues were discussed, including operational concerns, costs, risks, incidents, or Ministerial direction.

#### 4. Ministerial Messaging Apps

Copies of messages sent via:

- Signal
- WhatsApp (Ministerial accounts)
- Any other platform used by Ministers or Special Advisers

where Nation of Sanctuary matters were discussed.

#### 5. Instructions or Guidance on Using Private Devices

Copies of any internal guidance, instructions, or warnings issued to staff about:

- Handling FOI-able communications
- Using private devices for official business
- Retention or deletion of instant messages

relating to Nation of Sanctuary work.

### **ATISN 26472 – 06/12/2025**

For the period 1 January 2019 to the present, information relating to equality impacts, legal assessments, and human-rights considerations within the Welsh Government's Nation of Sanctuary programme:

#### 1. Equality Impact Assessments (EIAs)

- Equality Impact Assessments
- Integrated Impact Assessments
- Screening assessments
- Updated or revised EIAs

conducted for policy decisions, funding programmes, operational decisions, or changes relating to Nation of Sanctuary.

#### 2. Legal Advice or Legal Risk Assessments

Copies of any recorded:

- Internal legal advice
- Legal risk assessments
- Advice to Ministers from legal services
- Concerns relating to compliance with UK legislation

- Concerns relating to compliance with the Human Rights Act 1998 or Equality Act 2010

that relate to Nation of Sanctuary.

### 3. Human-Rights Impact Assessments

- Human-rights impact assessments
- Internal briefings referencing human-rights risks
- Assessments linked to safeguarding, accommodation, or vulnerable groups

relating to Nation of Sanctuary.

### 4. Concerns Raised by Officials

- Warnings
- Issue escalations
- Internal memos
- Briefings to senior officials or Ministers

where officials raised concerns about equality impacts, human-rights implications, or legal compliance.

## **ATISN 26473 – 06/12/2025**

For the period 1 January 2019 to the present, recorded information relating to serious incidents, emergency responses, and internal escalations connected to the Welsh Government's Nation of Sanctuary programme:

### 1. Serious Incident Logs

Copies of any recorded:

- Serious Incident Reports
- Major Incident Notifications
- Category A or equivalent incident logs
- Internal “Immediate Concern” reports
- Any incident logs escalated to senior officials or Ministers

relating to asylum accommodation, safeguarding, welfare, operational failure, or community safety.

### 2. Emergency Response Actions

- Internal emergency response plans
- Rapid-response meeting notes
- Crisis management briefings

- Incident response emails
- Contingency actions triggered following a serious incident

### 3. Escalations to Ministers or Senior Officials

- Escalation emails
- Briefings marked URGENT, IMMEDIATE, or HIGH PRIORITY
- Correspondence where officials raised serious operational concerns
- Internal warnings about risk of harm or service failure

### 4. Communications with External Bodies

Copies of correspondence relating to serious incidents between Welsh Government and:

- Home Office
- Local authorities
- Accommodation providers
- Police
- Health boards
- Third-sector partners

### 5. Post-Incident Reviews

- Lessons-learned documents
- After-action reviews
- Recommendations
- Internal assessments evaluating the Welsh Government's response to serious incidents

## **ATISN 26474 – 06/12/2025**

For the period 1 January 2019 to the present, information relating to the impact of the Welsh Government's Nation of Sanctuary programme on local communities, public safety, and local authority operations:

### 1. Community Impact Assessments

Copies of any recorded:

- Community impact assessments
- Local community risk assessments
- Social impact or public safety assessments
- Reports on community tensions or disruption

related to asylum accommodation or support programmes.

## 2. Public Safety Concerns

- Internal briefings on public safety issues
- Records of incidents affecting local residents
- Any assessments relating to crime, antisocial behaviour, or policing pressures linked to asylum placements

## 3. Local Authority Concerns or Escalations

Copies of correspondence or reports from local authorities raising concerns about:

- Accommodation suitability
- Community safety
- Local service pressures
- Housing impacts
- Safeguarding pressures
- Local complaints and political feedback

## 4. Police Liaison & Community Safety Reports

Copies of correspondence or reports between Welsh Government and:

- Police forces
- Police and Crime Commissioners
- Community safety partnerships

relating to asylum accommodation, public safety risks, or operational concerns.

## 5. External Complaints from Community Members or Organisations

Copies of recorded complaints received by Welsh Government from:

- Local residents
- Community groups
- Councillors or MSs/MPs
- Businesses

where those complaints relate to public safety or community impact from Nation of Sanctuary activities.

## **ATISN 26475 – 06/12/2025**

For the period 1 January 2019 to the present, recorded information relating to internal staff concerns, whistleblowing, or internal dissent regarding the Welsh Government's Nation of Sanctuary programme:

### 1. Whistleblowing Reports

Copies of any recorded whistleblowing disclosures that relate to:

- Safeguarding concerns
- Mismanagement
- Financial irregularities
- Failures in decision-making
- Bullying or suppression of concerns

## 2. Internal Staff Concerns

- Internal complaints
- Escalations raised by staff
- Anonymous concerns
- Written concerns submitted via HR, senior managers, or internal reporting routes
- Reports where staff indicated the programme was unsafe, ineffective, or at risk

## 3. Suppressed or Ignored Warnings

Copies of any recorded:

- Warnings that were not escalated
- Emails noting concerns were “not to be shared”
- Evidence of staff being discouraged from raising issues
- Internal disagreements about the safety or viability of the programme

## 4. Culture, Workforce Pressure & Morale Reports

- Staff surveys that reference Nation of Sanctuary work
- Internal morale assessments
- Workforce pressure or wellbeing reports
- Notes about staff capacity or burnout linked to programme delivery

## 5. HR or Governance Follow-Up

- Any internal investigations
- HR case summaries
- Governance reviews
- Actions taken or not taken following staff concerns

## **ATISN 26476 – 06/12/2025**

For the period 1 January 2019 to the present, recorded information held by the Welsh Government relating to the Nation of Sanctuary policy and asylum accommodation in Wales.

## 1. Ministerial Briefings

- a) Ministerial advice notes,
- b) Ministerial submissions,
- c) Ministerial briefing packs,
- d) Red boxes,
- e) Updates prepared for Ministers,

where asylum accommodation, the Nation of Sanctuary framework, hotel use, community impact, safeguarding, or third-sector funding were referenced or discussed.

## 2. Risk and Impact Information Provided to Ministers

- a) Any risk registers, risk assessments, or RAG-rated summaries sent to Ministers.
- b) Any briefings that referenced:
  - Community safety or antisocial behaviour
  - Safeguarding concerns
  - Local authority pressure
  - School, health, or housing impacts
  - Hotel closures or hotel capacity
  - Escalation of concerns from councils, NGOs, or the Home Office

## 3. Communication Summaries Prepared for Ministers

Copies of any internal summaries presented to Ministers which contain:

- a) Complaints received by the Welsh Government
- b) Community concern reports from councils, MPs/MSs, or residents
- c) Police liaison information
- d) Monitoring reports from funded NGOs
- e) Any “lines to take” or media handling advice relating to Nation of Sanctuary

## 4. Ministerial Meetings

- a) Agendas, minutes, briefing papers, and action notes for any Ministerial meetings where asylum accommodation, Nation of Sanctuary, or third-sector funding for refugee/asylum support were discussed.
- b) Copies of any internal submissions drafted to prepare Ministers for meetings with:
  - Home Office
  - Local authorities
  - Third-sector refugee/asylum organisations
  - Police or community safety bodies

## 5. If Information Was Not Produced

Confirmation if no Ministerial briefings exist for any part of this request.

## **ATISN 26477 – 06/12/2025**

For the period 1 April 2019 – present and relating to the Nation of Sanctuary policy, information on policy governance, risk, operational oversight, and internal programme management.

### **1. Ministerial Advice & Briefings**

Copies of any Ministerial Advice papers, Ministerial Submissions, decision reports, or briefing notes provided to, or prepared for:

- Ministers
- Deputy Ministers
- Directors / Deputy Directors
- Cohesive Communities Division

where the content relates to:

- a) Delivery risks, operational risks, or financial risks within the Nation of Sanctuary programme
- b) Capacity issues affecting Welcome Centres, hotel-based accommodation, or temporary housing
- c) Safeguarding concerns, health and safety issues, or trends in complaints
- d) Budget pressures, overspends, cost escalation or financial sustainability
- e) Proposed policy changes, restructuring, reductions, or expansion of the programme

### **2. Internal Risk Registers & Assessments**

Copies of any of the following relating to the Nation of Sanctuary programme:

- a) Programme or project risk registers (including RAG ratings)
- b) Operational risk assessments
- c) Oversight board or programme board risk reports
- d) Any updates submitted to Directors or Ministers highlighting changes in risk likelihood or impact
- e) Any internal documents describing programmatic risks or mitigations

### **3. Internal Reviews or Evaluations**

Copies of any internal:

- Evaluation reports
- Lessons learned documents

- Post-implementation reviews
- Delivery or performance assessments

relating to:

- Welcome Centres
- Hotel procurement and accommodation management
- Third-sector partner delivery
- Croeso Wales / Migrant Integration Wales
- Community-funded projects under Nation of Sanctuary

## **ATISN 26478 – 06/12/2025**

For the period 1 April 2022 – present, information regarding the procurement processes, selection rationale, and value-for-money assessment of hotels and accommodation suppliers used under the Nation of Sanctuary programme.

### **1. Procurement Route & Tendering**

For all hotels, accommodation providers, or welcome centre operators procured under the Nation of Sanctuary (including Ukraine response accommodation):

- a) Whether each contract was:
  - Competitively tendered
  - Awarded via framework
  - Sole-supplier procurement
  - Emergency procurement under pandemic/rapid deployment rules
  - Other procurement route (please specify)
- b) The procurement justification or approval record for the chosen route.
- c) Any procurement evaluation criteria used to select suppliers (including scoring sheets where available).

### **2. Value-for-Money (VfM) Assessments**

For each hotel/accommodation contract:

- a) Any value-for-money assessments, financial comparisons, benchmark analyses, or cost justification documents.
- b) Any internal calculations or spreadsheets comparing:
  - nightly rates
  - alternative suppliers
  - available accommodation stock

- expected vs. actual costs
- c) Any Ministerial or Director-level briefings discussing cost-effectiveness or financial sustainability of hotel use.

### 3. Contract Management & Cost Escalation

- a) Any documents describing cost increases, extensions, or renegotiations of hotel/accommodation contracts.
- b) Internal explanations for changes in pricing, including:
  - revised daily rates
  - increased capacity charges
  - additional service fees
  - amendments to terms
- c) Any risk assessments relating to overspends connected to hotel procurement.

### 4. Conflicts of Interest Checks

Copies of any:

- a) Conflict-of-interest declarations completed by staff involved in procurement or contract management for accommodation providers.
- b) Records of any conflicts identified and how they were managed.

## **ATISN 26479 – 06/12/2025**

For the period 1 April 2019 – present, information regarding safeguarding, welfare concerns, complaints, and incident reporting arising within the Nation of Sanctuary programme

### 1. Complaints Received (Aggregated Data Only)

- a) The number of complaints recorded relating to:
  - Welcome Centres
  - Hotel accommodation
  - Third-sector delivery partners
  - Community integration projects
  - Accommodation management providers
- b) Breakdown of complaints by category, such as:
  - Safeguarding
  - Welfare concerns
  - Anti-social behaviour
  - Staff conduct

- Service standards
- Accommodation conditions
- Violence or threats
- Other categories used internally

c) For each category, you requested:

- Number upheld
- Number partially upheld
- Number not upheld
- Number referred to external agencies

## 2. Safeguarding Incidents & Risk Referrals

Aggregated data showing:

- a) Number of safeguarding referrals made by Welsh Government or delivery partners.
- b) Number of cases referred to:
  - Local authorities
  - Police
  - Health boards
  - Third-sector safeguarding leads
- c) Categories of safeguarding concerns (e.g., children, vulnerable adults, exploitation, neglect, criminal activity, domestic concerns, environmental risks).
- d) Any internal safeguarding risk summaries, dashboards, or trend reports prepared for senior officials or Ministers.

## 3. Serious Incidents & Escalations

- a) The number of serious incidents formally recorded within the Nation of Sanctuary programme.
- b) Any internal criteria or definitions used to classify a “serious incident”.
- c) Any internal summary reports of serious incidents (with all personal data removed).

## 4. Complaints Handling & Safeguarding Procedures

- a) Internal guidance or standard operating procedures on:
  - Complaints handling
  - Safeguarding reporting
  - Escalation processes

- Incident logging
- Thresholds for external referral

b) Any updates or revisions to these procedures since April 2019.

## **ATISN 26480 – 06/12/2025**

For the period 1 April 2019 – present, information regarding monitoring, oversight, audit findings, performance issues, and non-compliance relating to the Nation of Sanctuary programme.

### 1. Monitoring & Performance Reviews

- a) Copies of any monitoring reports, performance reviews, or grant/contract monitoring summaries prepared by Welsh Government relating to:
  - Welcome Centres
  - Hotel accommodation providers
  - Third-sector delivery partners
  - Community integration projects
  - Accommodation management providers
- b) Any documents showing RAG ratings, delivery risks identified, or performance concerns raised during monitoring.
- c) Any internal summaries prepared for senior management or Ministers on delivery performance or emerging issues.

### 2. Non-Compliance, Breaches & Remedial Action

For all suppliers or funded organisations operating within the Nation of Sanctuary programme:

- a) Records of any non-compliance, breaches of contract, or failure to meet grant conditions.
- b) Any letters of concern, warnings, or requests for remedial action issued by the Welsh Government.
- c) Any instances where organisations were placed under:
  - “Enhanced monitoring”
  - “Improvement plans”
  - “Corrective action requirements”
  - Partial suspension or temporary pause of funding

- d) For each case, the nature of the issue and the action taken.

### 3. Audit, Assurance Reviews & Internal Checks

- a) Any internal audit reports, assurance reviews, or compliance checks carried out by Welsh Government relating to the Nation of Sanctuary programme.
- b) Any findings relating to:
  - Financial control weaknesses
  - Delivery failures
  - Oversight issues
  - Non-compliant expenditure
  - Documentation gaps
  - Failure to follow procurement or grant rules
- c) Any summaries or extracts of audit findings provided to Ministers, Directors, or Programme Boards.

### 4. Escalations & Governance Failures

- a) Any internal documents describing escalations made due to performance or compliance issues.
- b) Any internal correspondence or briefings referencing:
  - “Governance concerns”
  - “Programme weaknesses”
  - “Monitoring gaps”
  - “Inadequate assurance”
  - Organisations assessed as “high risk”
- c) Any recorded decisions to:
  - Terminate a contract
  - End funding early
  - Decline to renew a grant or contract due to concerns

### **ATISN 26484 – 07/12/2025**

For the period 1 January 2019 – present, recorded information held by the Welsh Government relating to asylum accommodation in Wales (including hotel accommodation and other sites used by Home Office contractors).

#### 1. Oversight, Risks and Internal Assessments

Any recorded information held by Welsh Government relating to:

- a) Risks, concerns, safeguarding issues, community impacts, or pressures identified in relation to asylum accommodation in Wales.
- b) Any internal risk assessments, risk registers, impact assessments, or briefings prepared for officials or Ministers.
- c) Any monitoring, oversight activity, or internal notes concerning the operation of asylum accommodation in Wales by Home Office contractors.

## 2. Local Authority Escalations

Copies of any concerns, incident reports, complaints, or escalations submitted to Welsh Government by:

- Rhondda Cynon Taf CBC
- Cardiff Council
- Swansea Council
- Newport Council
- Any other Welsh local authority

relating to asylum accommodation, safeguarding issues, community safety, or operational concerns.

## 3. Correspondence with the Home Office

Copies of all correspondence between Welsh Government and the Home Office where the following were discussed:

- asylum accommodation in Wales
- safeguarding or community safety concerns
- pressures on local authorities
- operational issues or incidents
- suitability or management of accommodation

including emails, letters, meeting notes, and Teams/WhatsApp messages held on official systems.

## 4. Ministerial Briefings and Advice

- Ministerial submissions
- Ministerial advice notes
- Briefing packs
- Red box updates

prepared for Ministers or Special Advisers relating to asylum accommodation in Wales, community impacts, safeguarding concerns, or local authority escalations.

## 5. Communications with Accommodation Providers

Copies of any correspondence held by Welsh Government with any asylum accommodation provider where service issues, safeguarding matters, community impact, or operational concerns were raised.

## **ATISN 26485 – 07/12/2025**

For the period 1 January 2019 – present, recorded information held by the Welsh Government relating to Clearsprings Ready Homes and the operation of asylum accommodation in Wales.

### **1. Oversight, Risks & Internal Assessments**

Any recorded information relating to:

- a) Risks, safeguarding concerns, community impacts, or operational issues identified by Welsh Government regarding sites managed by Clearsprings Ready Homes.
- b) Internal assessments, risk registers, RAG ratings, impact summaries, or briefing notes that refer to Clearsprings or issues arising from their accommodation provision.
- c) Any monitoring, review, or oversight work relating to Clearsprings' operational performance in Wales.

### **2. Complaints, Incidents & Escalations from Local Authorities**

Copies of any concerns, complaints, incident reports or escalations submitted to Welsh Government by:

- Rhondda Cynon Taf CBC
- Cardiff Council
- Swansea Council
- Newport City Council
- Any other Welsh local authority

where the subject matter relates to Clearsprings Ready Homes, safeguarding issues, accommodation conditions, community safety or operational difficulties, including internal summaries or briefing notes created in response.

### **3. Correspondence Between Welsh Government and the Home Office**

Copies of all correspondence—emails, letters, meeting notes, WhatsApp/Teams messages—between Welsh Government and the Home Office where any of the following were discussed:

- asylum accommodation in Wales
- Clearsprings Ready Homes operations

- safeguarding or community-safety concerns
- pressures on local authorities
- suitability, safety, or standards of accommodation
- reported incidents or escalations

#### 4. Correspondence Between Welsh Government and Clearsprings Ready Homes

Copies of correspondence held by Ministers, Special Advisers, Directors, Deputy Directors or officials where the following were discussed with Clearsprings Ready Homes:

- operational issues
- community or safeguarding concerns
- accommodation standards or suitability
- incident responses
- escalations or service failures

#### 5. Ministerial Briefings & Submissions

- Ministerial submissions
- Ministerial advice notes
- Red box updates
- Strategic briefing packs

that relate to Clearsprings Ready Homes, asylum accommodation conditions, community impacts, safeguarding issues, or local authority concerns.

#### **ATISN 26486 – 08/12/2025**

For the period 1 January 2019 to present, recorded information held by the Welsh Government relating to the Nation of Sanctuary programme, asylum accommodation in Wales, and the Welsh Government's internal oversight of risks, safeguarding concerns, and community impacts.

#### 1. Internal Risk Assessments & RAG-Rated Summaries

- a) Internal risk assessments
- b) RAG-rated summaries
- c) Escalation notes
- d) Issue logs
- e) Internal performance concerns

where asylum hotels, asylum accommodation, community impact, safeguarding, or local authority pressures were referenced or discussed.

#### 2. Risks Reported to Senior Officials or Ministers

- a) Risk reports
- b) Escalation summaries
- c) Situation updates
- d) Briefing notes

prepared for:

- Directors
- Deputy Directors
- Programme Boards
- Ministers

where risks relating to asylum accommodation, use of hotels, community safety, complaints, safeguarding, or operational pressures were highlighted.

### 3. Correspondence Containing Risk or Impact Summaries

Copies of internal correspondence (emails, memos, briefing notes) between Welsh Government officials that contain:

- a) Summaries of emerging risks
- b) Concerns raised by local authorities or the Home Office
- c) Noted safeguarding issues
- d) Red-flagged pressures on schools, health, housing, or community cohesion

### 4. Oversight Mechanisms & Monitoring Reports

Copies of any recorded:

- a) Programme oversight reports
- b) Monitoring dashboards
- c) Review summaries
- d) Any internal documents showing how WG tracked delivery risks or performance issues

for the Nation of Sanctuary programme and asylum accommodation support work.

### **ATISN 26516 – 18/12/2025**

For the period 1 January 2019 to present, recorded information held by the Welsh Government relating to Clearsprings Ready Homes and the operation of asylum accommodation in Wales.

## 1. Oversight, Risks & Internal Assessments

Recorded information relating to:

- a) Risks, safeguarding concerns, community impacts, or operational issues identified by Welsh Government regarding sites managed by Clearsprings Ready Homes.
- b) Internal assessments, risk registers, RAG ratings, impact summaries, or briefing notes that refer to Clearsprings or issues arising from their accommodation provision.
- c) Any monitoring, review, or oversight work relating to Clearsprings' operational performance in Wales.

## 2. Complaints, Incidents & Escalations from Local Authorities

Copies of any concerns, complaints, incident reports or escalations submitted to Welsh Government by:

- Rhondda Cynon Taf CBC
- Cardiff Council
- Swansea Council
- Newport City Council
- Any other Welsh local authority

where the subject matter relates to Clearsprings Ready Homes, safeguarding issues, accommodation conditions, community safety or operational difficulties. This request includes internal summaries or briefing notes created in response.

## 3. Correspondence Between Welsh Government and the Home Office

Copies of all correspondence—emails, letters, meeting notes, WhatsApp/Teams messages—between Welsh Government and the Home Office where any of the following were discussed:

- asylum accommodation in Wales
- Clearsprings Ready Homes operations
- safeguarding or community-safety concerns
- pressures on local authorities
- suitability, safety, or standards of accommodation
- reported incidents or escalations

## 4. Correspondence Between Welsh Government and Clearsprings Ready Homes

Copies of correspondence held by Ministers, Special Advisers, Directors, Deputy Directors or officials where the following were discussed with Clearsprings Ready Homes:

- operational issues
- community or safeguarding concerns
- accommodation standards or suitability
- incident responses
- escalations or service failures

## 5. Ministerial Briefings & Submissions

- Ministerial submissions
- Ministerial advice notes
- Red box updates
- Strategic briefing packs

that relate to Clearsprings Ready Homes, asylum accommodation conditions, community impacts, safeguarding issues, or local authority concerns.