Welsh Government Consultation

How to measure the inclusion of migrants in Wales

Joint Response by South Riverside Community Development Centre, TCC (Trefnu Cymunedol Cymru/Together Creating Communities), CLPW (Communidade de Lingua Portuguesa Wrexham), and Assadaqaat Community Finance.

About the Contributors

This consultation response has been developed as part of a partnership between grassroots community organisations and the Bevan Foundation which is bringing the experiences and views of migrant communities to influence policy decisions in Wales. You can find out more about the project here: https://www.bevanfoundation.org/current-projects/lived-experience-migration-wales/.

- **South Riverside Community Development Centre (SRCDC)**

South Riverside Community Development Centre (SRCDC) is a registered charity established for the purpose of benefiting the communities in the Riverside, Canton and Grangetown areas. It aims to advance the education of the public in matters related to mental, physical, cultural, and social welfare; and relieve poverty. You can find out more about SRCDC here: https://www.srcdc.org.uk/

- **Together Creating Communities (TCC)**

TCC is a registered charity that tackles social injustice by supporting diverse communities to gain the power they need to enact change. This is achieved through community organising: bringing together local groups, supporting them to set their own agenda, take action, and improve their communities. You can find out more about TCC here: https://www.tcc-wales.org.uk/

- **Communidade Da Lingua Portuguesa Wrexham (CLPW)**

CLPW is a registered community interest company which promotes educational, social, and cultural integration of Portuguese-speaking diaspora in Wrexham and North Wales. CLPW enriches North Wales through building bonds between residents and creating opportunities to

share and celebrate different cultures. You can find out more about CLPW here: https://www.facebook.com/clpw.uk/

- **Assadaqaat Community Finance**

Assadaqaat Community Finance (ACF) is an innovative not-for-profit provider of professional advice & financial support to aspiring entrepreneurs in the UK. At the heart of our organisation is the passionate belief in people and the goal of financial inclusion and empowerment for the less privileged members of our communities, especially from the Black and Minority Ethnic Communities and Migrants. You can find out more about ACF here: www.assadaqaatcommunityfinance.co.uk

Our Response

This joint response has been developed by 20 individuals with lived experience of migration who are living in Wrexham and Cardiff, and 4 individuals who are Wales / UK-born but have decades of experience of working with and delivering services for migrant communities in Wales. The views set out in this response were shared during a series of four group discussions with grassroots community members (n=19), and one session with SRCDC staff (n=5), facilitated by the Bevan Foundation.

Our response focuses on 4 key areas of the consultation: (1) the essential indicators of inclusion (*Question 2*); (2) barriers to the measurement of inclusion, with a particular focus on migrants' willingness to share information (*Question 4*); (3) how to address these barriers (*Question 9*); and (4) whether other there are other data linkages that should be explored (*Question 10*). We also briefly comment on *Question 11* – whether the experiences of children of migrants to Wales should be included in the Framework – before making a general comment about the development of a framework.

1. **Essential Indicators of Inclusion**

We first considered what is important to promote a sense of belonging in Wales – i.e. what is important for inclusion. The group identified the following things:

- Having opportunities to get to know Welsh communities, traditions, history and the language, while also being able to share and educate Welsh communities about other cultures and languages which are part of our identity.
- Having an understanding of the law and our responsibilities – for example, the taxes that need to be paid, criminal offences that are legalised in some other countries (e.g. FGM), the law removing the defence of 'reasonable punishment' for physically punishing children.
- Having an understanding of our rights and what we are entitled to – for example, welfare benefits, healthcare, childcare.
- Having an understanding of the functions of different public services, especially social services – how do they help families?
- Being able to speak English in day-to-day life, while also not feeling ashamed of speaking other languages in public.
- Access to finance – e.g. loans, credit cards.
- Feeling safe in the community – to be able to move around public spaces, including schools, without fear of experiencing racialised / religion-based abuse, or any form of harassment or discrimination.
- Having equal access to employment – but not just any employment: it is important that people can pursue their aspirations.
- Having access to good quality education and adult lifelong learning.
- Having strong support structures in place within the wider community. This is especially important for the following groups of people: older people who moved to Wales post-retirement age; and first-generation migrants who have come on spouse/partner visas. Often, they will be the least likely to have had a meaningful opportunity to learn English / Welsh, and, especially with the latter, they may not have a support network of wider family.
- Seeing more black and ethnic minority representation in politics, schools, hospitals, councils, the police, and in a wide range of professions and workplaces.

- Feeling confident that all employers implement an 'equal opportunities' policy.

- Being able to access support services, such as mental health and counselling services, without barriers.

- Having opportunities to enjoy nature and the environment.

- Having a strong sense of mission / purpose and being able to pursue it.

- Having access to suitable and adequate housing.

We then looked at the Home Office's *Indicators of Integration* and the Welsh Government's *Well-being Indicators* and compared our answers. We saw that, while there were significant overlaps between our answers and the domains and indicators of inclusion included in these two existing frameworks, there were also some gaps.

First, we felt that financial inclusion ought to be identified as a domain. Financial inclusion is essential to having a means of living, and the sense of self-sufficiency it creates promotes good mental health as well as enabling physical health and nourishment. While 'work' is a *form* of financial inclusion, it is only one part of it. Some people may not be able to access employed work, especially in the first few years of arrival in the UK – whether this is due to language barriers, lack of recognition of existing (international) qualifications, or for other reasons. Many of these people would therefore like to set up their own business, but they have no access to finance / no support to access finance to help them with their entrepreneurial aims. As one participant said:

> *"[another] exclusion [faced by many migrants] is the means of living. First of all in whether they find a job… but there is no self-employment or entrepreneurship opportunities after that. They want to work, they want to find their own enterprise or business, in café, food, clothing… there is a lot of opportunity for that here. Sadly, there is no support there to be able to include them [migrants] into the system. Access to finance becomes a barrier – because they have no real savings, credit history, credibility – for [loan / finance] eligibility, they are expected to have this"*

Another participant said:

"They want to do things, they don't want to get on to the benefits, they want their own freedom, independence, add to the society… but there are certain barriers like not being able to get a job or access finance that don't give them the opportunity to do that"

Overall, the group felt that financial inclusion should be a separate domain, with access to work being a sub-domain within it. Participants felt strongly that setting up businesses should be encouraged and better supported – both as a means of financial inclusion for individuals but also in terms of creating jobs for others.

The second gap we identified in the existing indices was the inability of the two matrices (Home Office and Well-being Indicators) to capture information about *choice* – especially in relation to the domains of work and education. This is especially important for well-being and inclusion. Measuring how many people are in work does not tell us about their experience of being in work – whether it is a job that they are doing to 'get by', or because they had no other choice, or because it is what they want to do. We have already mentioned that the lack of recognition of overseas qualifications can present a significant barrier for migrants in terms of continuing with their career path / occupation in their country of origin. One participant said:

"My main experience [of working with migrant individuals] has been, that when these people come, they are already having some education or standing in their own countries… yet when they come here it is not acceptable. The first thing they come across that really excludes them, rather than includes them, is the qualifications they have"

This is clearly an issue that needs further attention and willingness to address. However, in the meantime, it is important for service providers to understand that this barrier exists and try to find other solutions which are in line with the individuals' choice. To do this:

"it's very important for local authorities to understand personal information... In terms of employment, what kind of qualifications do they have… what is very important , the key question is "would they want to carry on with the same career path as they have which they left in their country, or would they like to switch over to

another career path?" Many people would be willing to do a job that they are
familiar with doing but skills training is required before they can apply for that job…
If there is no guarantee of a job, they would rather self-entrepreneurship."

In other words, it is important that the matrix of inclusion can capture not just how many people are earning, or are in work, but how many of them are doing work that they actually want to be doing. Do they feel valued? Do they feel like they have other options / a choice?

The third and final gap we identified in the existing indices is in relation to language and communication. The group believes that the almost exclusive focus on ESOL and individuals' ability to speak English / pass English-language tests ignores the fact that learning English is a process (and may take years). In the meantime, language support must be available to people who cannot speak English to ensure that they can access / achieve the other domains of inclusion. In other words, to access healthcare services, IT literacy classes, apply for housing, *etc.*, it is necessary to know and understand how to do this. If you do not yet speak or understand much English, you need interpretation support. Many people rely on family members for this support – but not only is this not always safe (especially in specialist settings, such as legal proceedings, benefits applications, hospital appointments), but also it limits when services can be accessed (since, for example, family members may be working and unavailable for most of the day).

Therefore, in looking at language and communication as a domain of inclusion, the group felt that the indicators should include access to professional interpretation.

2. Barriers to the measurement of inclusion

We considered barriers to the measurement of inclusion both from an organisational perspective, and from the perspective of migrants' willingness to share information.

In the first instance, everyone agreed that the current Home Office matrix is too complex and draws distinctions between domains which are actually interlinked. For example, questions were asked about why education is detached from 'rights and responsibilities'; whether 'language' can really be separated from 'culture'; and how housing and healthcare should actually be sub-domains within 'safety'. A ranking exercise undertaken by the groups of the

Home Office's domains of integration showed that, overwhelmingly, 'safety' and 'language and communication' were perceived to be the most fundamental (while, interestingly, 'leisure' was consistently ranked least important).

From an **organisational perspective**, in addition to the inadequacy and complexity of the current Home Office matrix, staff felt that there were three significant barriers to using such a framework for recording inclusion data. First, many third sector services simply are not resourced to purchase, and do not have the capacity nor the training to use, a case management system which would enable systematic collection of these data. Second, the way in which the third sector is almost wholly reliant on short-term funding is not conducive to enabling staff to report on this data, since there is a high staff turnaround. Moreover, the funding that *is* provided for projects does not cover the cost of the time that would be required by staff record and report on these data. Third, there is a concern that, unless the matrix is substantially simplified, the emphasis within organisations would start to shift from service delivery to 'intelligence gathering'.

Another concern raised by a few members of the group was that, actually, a lot of these data are already being recorded – for example through the Welsh Index of Multiple Deprivation – but that there is not enough capability to analyse these data centrally. There was a concern that this Framework will end up being:

> *"yet another data collection exercise which never leads to any tangible outcomes or change"*

From the **perspective of migrant individuals as potential service users** who would be asked to answer questions on inclusion, many barriers were highlighted.

First, there is a *lack of trust between communities or individuals, and services* – especially public services like the police and social services. The group felt that this was due to a lack of sensitive and meaningful engagement between mainstream services and the community, as well as existing negative experiences which have not been addressed or resolved:

> *"The major barrier is, firstly, how to engage the various communities. That's very important for any government or third sector organisation to understand what kind of people are we engaging with."*

The group felt that, often, a lot of good work is undertaken by mainstream organisations and local / national governments, but that this is not known by the grassroots. There is still a significant gap between policy intentions and the lived experience of those on the ground – and this is sustained by a continuing lack of accessible information and inadequate communication with communities.

The **second** barrier is a *lack of understanding within the communities about why* the information is being collected. Participants felt that, too often, they and the wider community are asked to answer questions, surveys, or participate in research without properly understanding why the questions are being asked, nor what will be done with their information. One participant, reflecting on the conversation in the group said:

> *"interpretation and perception of what this data means to be doing is again a barrier. People will withhold information if they don't understand why they're being asked."*

This also linked into the **third** barrier: a *fear of the information gathered being used inappropriately or unethically*, for example to discriminate against people. Participants felt that unless individuals are convinced that the information gathering is in their interest / for their benefit, they will not answer the questions – and might be deterred from trying to access the service in future. Previous experiences of discrimination by employers, or in the housing sector, where questions in relation to ethnicity and nationality are routinely asked, have built a suspicion and distrust among many migrant communities about how this information is used. In the words of one participant:

> *"every time we put a tick in that box [ethnicity], it goes against us."*

Another participant said:

> "*I knew if I put down mixed race, I would not get the job anyway*"

The **fourth** barrier related to the issue of *relevance*: some questions are relevant for some services to ask, but not for others. The group felt that the Welsh Government needs to be clear about which services should be asking which questions, and that each service needs to understand and be able to explain to service users why each question is relevant. An example was given by a participant of a situation where questions on nationality and ethnicity were relevant, but their purpose completely misunderstood by a housing officer:

> *"I asked him why they needed to know my ethnicity… he said that "if there are many groups of travellers, or Africans, we put them all in the same street"… this is ridiculous, just because I am [from a particular country / continent], it doesn't mean we all need to live on the same road!… this doesn't help with integration"*

Situations like these undermine the willingness of individuals to provide such information in future and highlight the importance of ensuring that the people *asking* the questions actually understand why they are asking them.

The **fifth** barrier is the sense of 'information sharing fatigue': people are *tired of answering questions about equality and diversity and not seeing any positive changes*. The group felt that the Welsh Government needs to understand that people have been answering questions about nationality, ethnicity, access to benefits, *etc.* for years, but that no positive outcome or change appears to be linked to these data collection exercises. For example, employers often ask questions to monitor diversity and equal opportunities; but, as one participant said:

> *"I have been here and answering these questions for more than 20 years… and still, if you go to [name of chain of shops], you don't see any black worker… you don't see anyone BME in the bank… there is only one in [another big chain], on the night shift. In the police? Nobody. Just one BME woman in the police."*

Another participant said:

> *"Here, the only BME people you see in businesses or shops is people who have started their own business from scratch, all on their own without support from anybody… working so hard to get that money… a constant struggle"*

Summing up the feelings of many members of the group about the prospect of being asked more personal questions by an increasing number of services, one participant said:

> *"If I saw, where I live, that we putting our colour in the box makes any difference or impact, I would understand. But as it is, these questions make no difference whatsoever where I live."*

The **sixth** and final barrier relates to the *lack of sensitivity and empathy within many services* who would be asking these questions – particularly in relation to the cultural, religious, and language needs of particular groups of people.

> *"Understanding sensitivity – respecting the area of work, rather than asking questions that could be embarrassing. For example question on religion: a lot of people don't feel very comfortable answering this question … but there are instances where it is very important, for example healthcare… diet plan – important for dietitian to understand what the patient can or cannot eat".*

The group felt that currently, there remains a significant lack of sensitivity, understanding and empathy among policy makers and mainstream service providers to these different issues. The result of asking personal questions under these conditions is likely to be that people do not answer and/or are deterred from accessing the service in future.

3. How can these barriers be addressed?

In relation to the complexity and inadequacy of the indicators matrix, there was a suggestion made in the group that the Welsh Government could look at building on a different matrix: the Social Progress Index (more on this in Section 4).

In relation to the organisational barriers, participants felt that to overcome these, the following actions should be taken: (1) the Welsh Government should fund organisations to develop the capacity to introduce data recording systems which would allow for systematic data collection; (2) funders should be encouraged to cover the costs of administration (data recording) in their contracts; and (3) funders, especially statutory funders, should commit to

moving away from short-term project funding and towards longer-term contracts which would build stability into the organisations.

In relation to the six barriers identified for prospective service users who would be asked the questions in the framework, the following solutions were proposed:

First, the Welsh Government must identify who the key trusted people are within each migrant community who can help to promote knowledge, engagement, and trust between the communities and the government / services. One participant said:

> *"If I need to engage east European community, I would have one or two people from that part of the world who understand the culture, religion, values"*

There are numerous informal and organised groups across Wales who are deeply involved with their respective communities – the Welsh Government should offer funding to these groups to help to explain why the framework is being introduced, who will be asking questions, and why.

> *"These big service providers, the government: they know how to get to us, to reach us… If you want to come to the community, you know how to do it… They could do a seminar, train the trainer… these courses cost money, but that's what works"*

Second, there was a strong sense from some participants that questions about ethnicity should be shelved in favour of nationality and/or place of birth. Many people find the extensive list of ethnicities more confusing than helpful, and people said that, while they are likely to feel proud of their nationality and happy to share this, they may feel more apprehensive about identifying their ethnicity.

Third, the Welsh Government should ensure that a very strong message is developed and communicated about why the framework is being introduced. The narrative must be strong and clear that it is about being able to better promote the wellbeing of people. It must be clear that, despite the questions focusing on individuals, the end goal is to improve access to services and opportunities. *However*, it is also important to manage expectations and not make empty promises:

"Delivery on the ground is important for raising confidence. If previous surveys, people have asked for it and nothing has happened, this has destroyed a lot of the trust and integrity and the bridge building in between the communities and the people who want to deliver… You need to be clear about what, realistically, can be expected as outcomes, and when"

An ongoing communications campaign should help with disseminating this information, but it is not sufficient. The role of the trusted groups / community members as mentioned above will be central both in informing the campaign but also in transferring the information from mainstream avenues into the core of communities.

Fourth, a feedback loop must be developed between communities and the Welsh Government. Updates must be provided as to how things are progressing: keeping communities informed about how the provision of information has helped to improve things is essential.

Fifth, safeguards need to be introduced to ensure that the data collected is used solely for the purpose set out in the introduction the Framework. For example, people must be reassured that there is no risk of the data collected through the Framework being passed on to other agencies, such as the Home Office, or employers, for other purposes.

Sixth, a "prefer not to say" option must still be included, and it must be clear that selecting this option will not have any negative repercussions for the individual, including in relation to accessing the service.

Seventh, the Welsh Government must proactively seek to identify issues in the early stages and throughout the implementation of the framework to address them as soon as possible. Strong channels of communication between the grassroots, service providers, and the Government must be opened and maintained for this purpose.

Eighth, and finally, service providers must be trained on how to ask personal questions sensitively and empathetically, and at the right time. They must also be trained on the

purpose of the framework and ensure that they always offer an explanation to service users when asking the questions.

4. **Are there any other data linkages that should be explored?**

There was a common view among participants that a lot of the information about service availability and accessibility is already measured in some ways in Wales. The first step in this process, before developing a new framework, therefore, should be a scoping exercise to identify and analyse existing data and store it centrally. In particular, the Welsh Index of Multiple Deprivation was mentioned as a data source which, through undertaking multiple geospatial surveys, has accumulated a wealth of information about many indicators of inclusion, including economic, education, transport and health.

Another suggestion was that the Welsh Government should explore adapting the [Social Progress Index](#) instead. The person who made this suggestion believes it is a more helpful and simple matrix, which organises social progress, or individuals' well-being / quality of life, according to three key domains: basic human needs (which includes safety, security, nourishment, shelter, etc.); the foundations or 'building-blocks' of wellbeing (e.g. healthcare, language and communication, education); and the availability and accessibility of opportunities which create the conditions for all individuals to reach their full potential.

5. **Question 11: should the Should the experiences of the children of migrants to Wales form part of our final tool?**

Participants overwhelmingly were of the view that it is essential for the experiences of children of migrants to form part of the final tool – both those who have moved to Wales with their parent(s), as well as those born in Wales. This is primarily because children's experience of inclusion (or exclusion), especially in their formative years, can have a significant impact on their well-being, choices, and quality of life.

6. **General Comment**

There was a very strong sense in the group that it is going to be a difficult task to persuade people of the benefit of sharing information for this framework. This is particularly the case

because people are already very much aware of what the barriers to inclusion are – and they have seen little change despite *already* sharing information over many years. They also possess a strong understanding of how to solve these barriers and would prefer the Government's energy to be spent on implementing these solutions.

However, the participants recognise that it is important for the Welsh Government to have a clear picture of where, and how, to direct resources. They also are of the view that this exercise, if done properly, could improve relationships between communities, service providers, and decision-makers. As one participant said:

> *"If the direction of travel is right, then slowly but surely there will be a change"*

Therefore, the participants urge the Welsh Government to work directly with grassroots community groups in the development of the framework, communication campaign, and implementation period.

END OF RESPONSE

Contact Details

Name: Dr Heddwen Daniel and Dr Victoria Winckler

Organisation: Bevan Foundation

Email address: heddwen.daniel@bevanfoundation.org

victoria.winckler@bevanfoundation.org