



Greater Manchester  
**IMMIGRATION AID UNIT**



# **SUPPORTING PEOPLE ON THE 10-YEAR ROUTE TO SETTLEMENT IN THE NORTH WEST**

**BRIEFING FOR LOCAL AUTHORITIES**

**Rivka Shaw and Lucy Mort**

May 2024

## ABOUT GMIAU

Greater Manchester Immigration Aid Unit (GMIAU) was set up in 1989 as a community response to racist immigration laws affecting people in our communities. We provide immigration legal advice and representation as well as support services to people affected by immigration control across the North West.

[www.gmiau.org](http://www.gmiau.org)

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# CONTENTS

<b>Summary</b> .....	<b>5</b>
<b>1. Introduction</b> .....	<b>7</b>
<b>2. The role of local authorities in supporting people on the 10-year route</b> .....	<b>8</b>
What are the key features of the 10-year route? .....	8
When might local authorities come into contact with someone on the 10-year route? .....	8
What are the duties and powers of local authorities?.....	9
What relevant commitments have local and combined authorities made? .....	10
<b>3. Methodology</b> .....	<b>11</b>
<b>4. Support needs</b> .....	<b>14</b>
Restricted eligibility (NRPF).....	14
Immigration advice .....	15
Children and families .....	20
Employment .....	23
Housing and homelessness .....	26
Healthcare .....	28
<b>5. Recommendations to local authorities</b> .....	<b>29</b>
Frontline workers .....	29
Commissioners and managers .....	29
Local political leaders.....	30
<b>References</b> .....	<b>31</b>

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## DISCLAIMER

This report has been jointly authored by IPPR and Greater Manchester Immigration Aid Unit (GMIAU). GMIAU provides immigration legal advice to people across the North West. For full transparency, GMIAU is currently commissioned by the Greater Manchester Combined Authority to provide legal immigration advice services.

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\* Pseudonyms have been used to protect participants' identity.

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# SUMMARY

This briefing is intended as a practical resource for local authority workers so that they can support residents in the North West who are on the 10-year route to settlement and who are experiencing challenges as a result.

The 10-year route to settlement is an immigration pathway for people living in the UK who have a strong human rights-based reason to remain here – either because they have children or a partner in the UK, or because they have lived here for a long time. However, the requirements of the route mean that many individuals and families placed on it experience significant hardships.

The briefing focusses on key support needs. It sheds light on the detrimental impacts of the 10-year route and provides practical information on how local authority workers can mitigate these harms.

This briefing covers the following.

- **Restricted eligibilities, or ‘no recourse to public funds’ (NRPF):** People on the 10-year route are, by default, denied access to a basic safety net – contributing to many struggling to cover the cost of day-to-day essentials. We highlight the commonly reported experience of being turned away from services due to NRPF and the importance of treating NRPF as a support need, which can (in certain circumstances) be lifted with legal advice.
- **Immigration advice:** To prevent people losing their legal immigration status (a key risk associated with the 10-year route), this briefing encourages local authorities to recognise key immigration issues, link people up with legal advice and support where necessary, and signpost to self-help resources for those without legal representation.
- **Children and families:** Children who are either on the 10-year route themselves, or whose parents are on the route, are at risk of growing up in poverty, and face detrimental consequences for their education, health, wellbeing and future prospects. Outlining legal duties under the Children Act (1989), we call for local authorities to ensure the best outcomes for all children living in their area, regardless of immigration status.
- **Employment:** People on the 10-year route face barriers when it comes to entering or staying in secure, decent work. Temporary visas, delays in Home Office processing, and difficulties proving their right to work, mean many are at risk of losing jobs or working in insecure and exploitative conditions. We outline the legal rights associated with ‘3c leave’ and amplify calls for the Home Office to provide proof of people’s entitlement to work while on the 10-year route.
- **Housing and homelessness:** A heightened risk of homelessness among people on the 10-year route is identified, necessitating proactive measures from local authorities to prevent homelessness and address housing instability. We showcase good practice examples from Greater Manchester and emphasise the need for joined-up working and funding for immigration advice to prevent homelessness for this cohort.

- **Healthcare:** This briefing evidences the severe impact of the 10-year route on physical and mental health, and calls on local authority workers to refer on to specialist support as necessary and to address the practical challenges of the route, including through legal immigration advice.

Overall, this briefing aims to provide local authorities with practical information to ensure that all those who call the North West home, including those on the 10-year route to settlement, are supported to thrive in our communities.

# 1. INTRODUCTION

This briefing is for local authorities and local authority workers who encounter some of the thousands of people in the North West who are experiencing hardship on the 10-year route to settlement. It will be particularly relevant for local authority teams supporting residents regarding restricted eligibility ('no recourse to public funds' or NRPF), immigration advice, children and families, employment, housing and homelessness, and healthcare. We explain:

- what the 10-year route is, including its key features
- the circumstances in which local authority workers may meet people on the route
- the steps local authorities can take to mitigate the harms of the route.

We believe that by being fully informed about the 10-year route and taking proactive steps to support people, local authorities can better meet their legislative duties and local commitments to all residents, regardless of their immigration status.

The briefing is jointly authored by Greater Manchester Immigration Aid Unit (GMIAU), a charity that provides immigration legal advice to people across the North West, and the Institute for Public Policy Research (IPPR), a national charity working for a better and fairer future.

The briefing draws on previous research, '*A punishing process: Experiences of people on the 10-year route to settlements*', published by GMIAU, IPPR and Praxis in March 2023, which included a survey of over 300 people on the 10-year route (Mort et al 2023). In addition, we draw on interviews with people on the route in the North West, and evidence gathered via GMIAU's lived experience action group at a listening event with local authorities held in Manchester in July 2023.

## 2. THE ROLE OF LOCAL AUTHORITIES IN SUPPORTING PEOPLE ON THE 10-YEAR ROUTE

The 10-year route to settlement is an immigration pathway for people living in the UK who have a strong human rights-based reason to remain – either because they have children or a partner here, or because they've lived here for a long time.

While it provides a much-needed route for people who might not otherwise be able to meet the requirements of the immigration rules, it does so at great expense to the individuals and families who are on it. The excessive length of the route, coupled with its high cost, means that people who are committed to making their lives in the UK are forced into precarious circumstances for long periods, leaving them vulnerable to losing their legal immigration status and potentially homeless.

### WHAT ARE THE KEY FEATURES OF THE 10-YEAR ROUTE?

The 10-year route has four defining characteristics, each of which contributes to the hardships people face.

- **Short grants of leave.** Every two and a half years (30 months), people must apply for limited leave to remain (LLR) until 10 years have elapsed. Home Office delays in deciding applications are a commonly shared feature of people's experiences, with people often spending years over the course of their 10-year route waiting for decisions.
- **High costs.** Due to the requirement for repeated visa renewals and recent fee increases, an adult on the 10-year route will be liable to pay over £18,000 in fees before they can settle indefinitely in the UK.
- **Complex applications.** People may struggle to navigate an online application system, and it can be difficult to get legal advice on immigration matters.
- **No recourse to public funds (NRPF).** While people on the 10-year route have the right to work, generally they face restrictions accessing welfare benefits and homelessness support.

### WHEN MIGHT LOCAL AUTHORITIES COME INTO CONTACT WITH SOMEONE ON THE 10-YEAR ROUTE?

Across the UK, it is estimated that around 170,000 people are on the 10-year route to settlement, which means that local authorities will inevitably interact with people on this route. However, depending on their role, local authority workers may lack familiarity with the route, and the challenges and restrictions faced by these individuals, as well as their entitlements.

People are unlikely to present to their local authority saying, "I'm on the 10-year route". Instead, they may mention their visa, having "two and a half years' leave to remain" or limited leave to remain, papers expiring, or not being able to access benefits. Contact may occur through referrals to various support services such



as early help, housing services, or debt services. Additionally, problems may be raised via schools, childcare facilities or healthcare settings. Many people may be unaware that their immediate problems stem from their immigration status, though others will be. This briefing aims to support local authority staff to be curious and confident enough to ask the right questions.

Some examples of situations that people on the 10-year route might face include:

- struggling with poverty, debt or destitution because of the burden of saving for fees, or because of having restricted eligibility for welfare benefits (ie NRPF)
- requiring legal immigration advice to complete a visa renewal application, a fee waiver application or change of conditions application
- facing homelessness or housing difficulties due to financial problems, but without the right to access housing benefit or most mainstream housing help
- experiencing problems with landlords or employers due to having temporary or insecure immigration status, or due to Home Office delays in renewing leave to remain
- losing status altogether, meaning losing the right to work, rent and access healthcare, because of the financial or administrative burden of the route.

### **BOX 2.1: HOW TO UNDERSTAND SOMEONE'S IMMIGRATION STATUS**

Some local authority workers might have concerns about appearing to interrogate people about their immigration status, and residents may equally be fearful of talking to statutory bodies about their immigration issues. But it is possible to reassure people that they are not being asked these questions to restrict support or punish them, but to get them the right kind of support, and that the conversations will not be shared with the Home Office.

The following questions could help determine someone's immigration situation.

- Do you know your immigration status/if you have leave to remain?
- What kind of leave to remain do you have?
- Have you had help from an immigration lawyer?
- Have you paid visa fees to the Home Office?
- Are you struggling because of visa fees? Or NRPF?
- Are you able to access benefits?
- Have you ever tried to have the NRPF condition removed?

### **WHAT ARE THE DUTIES AND POWERS OF LOCAL AUTHORITIES?**

- Under the Children Act (1989) and the Care Act (2014), residents are entitled to support from their local authority, and support under these Acts are not regarded as public funds for immigration purposes.
- Under section 17 of the Children Act, the local authority must “safeguard and promote the welfare of children within their area who are in need”. This means providing financial support and accommodation to families with children who are at risk of homelessness or unable to cover their basic living needs.
- Under the Care Act, adults with care needs arising from a “physical or mental impairment or illness” can also be given financial support and accommodation from their local authority, including people on the 10-year route who have NRPF.

People with NRPF cannot access mainstream housing support through housing benefits but the local authority still has duties to house families and individuals in need.

Additionally, local authorities do not need a legal duty to provide advice, homelessness prevention support, or rough sleeping outreach services. Some local authority funding sources, such as the Rough Sleeping Initiative, are not considered public funds and do not therefore have restrictions on the basis of immigration status. This resource from [Homeless Link](#) details local authority duties and outlines the additional powers that local authorities have to accommodate people with NRPF (Homeless Link 2022).

### **WHAT RELEVANT COMMITMENTS HAVE LOCAL AND COMBINED AUTHORITIES MADE?**

In the North West, local and combined authorities have made commitments that go over and above the minimum requirements of their legal duties, with promises made to ensure this is a truly welcoming and equal region. Liverpool City Region (2023a) have pledged to embed equality, diversity and inclusion in all they do, through “taking proactive action to tackle inequality, remove barriers and provide opportunities for all of our residents”. Similarly, the Greater Manchester Combined Authority (2024) has committed to “enable resilient, safe, and vibrant communities” while Manchester City Council (2024a) promises to be “a truly equal and inclusive city, where everyone can thrive at all stages of their life, and quickly and easily reach support to get back on track when needed”.

These commitments to residents are particularly important because they are set amid an ever more hostile national policy agenda on immigration, where people are often excluded from support based on their immigration status. To truly achieve these goals of equality, safety and opportunity for every resident, local and combined authorities must acknowledge the role of immigration policies in driving inequality, and proactively take action to mitigate their impact.

### 3.

# METHODOLOGY

This briefing draws on three sources of data.

- First, we draw on previous research, published in March 2023, which included a survey of 314 people who were on, or had been on, the 10-year route (Mort et al 2023).<sup>1</sup> While most people who responded were based in London (61 per cent), the second largest number came from the North West, with 42 respondents (14 per cent). In this briefing we share findings from both the overall national survey results and, where the findings differ, from respondents living in the North West. See box 3.1 for further information about the North West respondents.
- Second, we draw on two interviews with people on the 10-year route who live in the North West. They were asked about their experiences of accessing support and services while on the 10-year route. See box 3.2 for more details about the women we spoke to.
- Finally, we also share evidence gathered via GMIAU's lived experience action group at a listening event with local authorities held in Manchester in July 2023 (see box 3.3 for further information).

#### BOX 3.1: NORTH WEST SURVEY RESPONDENTS

Due to the small sample sizes, we share only a select number of key findings from the North West sample in this briefing. We have taken care to identify where the sample size was fewer than 10 for any given response.

Out of 42 North West respondents, half were aged between 35 and 44, while just over a quarter were aged between 45 and 54. Around 83 per cent were women, somewhat higher than the national sample (69 per cent). Twelve nationalities or continental identities were represented in the North West sample, with almost half coming from Nigeria (49 per cent). Around one-quarter came from The Gambia and Ghana combined (15 per cent and 10 per cent respectively, totalling 10 people).

Around 36 per cent of North West respondents were in either part- or full-time work, compared to 46 per cent nationally. People in the North West were likely to be either unemployed and seeking work or not in paid work for another reason (29 per cent of North West respondents compared to 19 per cent nationally). Others specified that they were either caring for family members (17 per cent) or in education or training (17 per cent). For those in work, the largest numbers of respondents were in care-worker roles (six people) or in customer service roles (three people).

We asked respondents their reason for coming to the UK and for being on the 10-year route. In line with the national sample, 33 per cent came as a visitor, while North West respondents were more likely to have come to the UK to claim asylum (29 per cent versus 15 per cent nationally). The main reasons given for being on the 10-year route were that they were the parent

<sup>1</sup> For further details about who responded to our survey nationally, please see the report: *A punishing process: Experiences of people on the 10-year route to settlement* (Mort et al 2023).

of a British child (30 per cent) and the parent of a child who has lived in the UK for at least seven years (28 per cent). Notably, a higher proportion of North West respondents gave their reason for being on the 10-year route as being the parent of a child with a serious medical condition (18 per cent compared to 3 per cent nationally). Of the 10 people who gave this reason in the entire national sample, seven were from the North West.

### BOX 3.2: STORIES FROM THE NORTH WEST

**Deborah** has been living in Manchester for 11 years, and in the UK for 20 years. She is a single parent of four children, two of whom are British. One child has care needs. She is nearing her final application on the 10-year route and says of the route:

**"It's really, really distressing for people, families with children, families with disabilities. Something needs to be done. People go without food, go without so many things because they have to save for fees."**

Deborah says that particular crisis points in her 10-year route came at times when she was waiting for Home Office decisions.

**Elizabeth** has been living in the UK for 14 years. She started the 10-year route in London and has lived in Greater Manchester for the last seven years, working in NHS hospitals. She has four British children to whom she is a single parent. She described the cycle of financial hardship caused by life on the 10-year route:

**"You live on whatever you earn, you don't have access to any public funds. So, I had to take my child to childcare full time, and it was so expensive. And still I had to save for my next two and a half years, for my visa fees and lawyer's fees. For my second application I had to use a credit card for my fees, so you're in debt, the credit card charging you every day. I was working in the emergency department. You have to put a smile on your face and be the best of you. But you yourself need help. Inside, you are dying slowly."**

### BOX 3.3: ABOUT GMIAU'S ACTION GROUP

Since 2022, Greater Manchester Immigration Aid Unit (GMIAU)'s community organiser, Fatou Jinadu, has been running an action group of women on the 10-year route who are all based in Greater Manchester. They work to speak out on their experiences, and campaign and advocate for change locally and nationally.

In July 2023, the action group launched their campaign on the 10-year route to settlement, called #BrokeButNotBroken. Staff from local authorities across the North West, voluntary sector organisations and people with lived experience of immigration controls were invited to discuss and learn about the reality of the 10-year route.

During the event, frontline local authority workers expressed a lack of understanding and training about immigration issues, and were surprised to learn about the burden of fees and restrictions faced by residents in their communities while working and raising families.

Key concerns that came up in workshop discussions included:

- a lack of knowledge, communication, and consistency in approach between local authority staff and departments
- that people on the 10-year route felt stigmatised and had a lack of trust towards services
- that local authority staff felt they lacked knowledge and were not empowered to help people on the 10-year route, that they lacked capacity or did not think it was in their job description to provide support on this issue.

This briefing is partly informed by the insights of local authority workers attending the event, including what they told us they needed to feel more confident on this issue. It also includes some of the lived experience stories shared by action group members at this event.

## 4.

# SUPPORT NEEDS

In the following sections we outline a number of support needs that have been identified through our research that are relevant to local authority workers. For each topic, we include resources and guidance that can help when supporting someone navigating the 10-year route.

### RESTRICTED ELIGIBILITY (NRPF)

Most people on the 10-year route are, by default, subject to the NRPF condition. This means that they are restricted from accessing many mainstream welfare benefits (such as universal credit and housing benefit), as well as statutory homelessness assistance and a local authority allocation of social housing.

This exclusion from the welfare safety net is particularly impactful given the financial insecurity that many on the 10-year route experience, in large part because of the high fees people have to pay to renew their leave every two and a half years.

When we spoke to people in the North West about their interactions with local authority workers, often it was felt that having NRPF was treated as a total barrier to accessing support. At GMIAU's July 2023 listening event, one person said: "The council sent me away because I had no recourse to public funds, even though my daughter is a British citizen. They said you're the one applying, not your daughter."

At the same event, local authority workers attending acknowledged that their understanding of NRPF was very limited, with one admitting: "I came here with what I thought was basic knowledge of NRPF and immigration issues. But I actually had no idea."

An all-too-common experience for people with NRPF is that a lawyer or another advocate (for example a voluntary sector worker) has to push local authorities to fulfil their duties. Elizabeth accessed section 17 support from her local authority but said:

***"They will not help until maybe a lawyer will intervene for you. If you go and walk in there yourself to tell them your problem, no. They say oh, we'd love to help, but due to not having public funds we can't do anything about it. They wouldn't tell you it's a condition that can be lifted."***

However, people on the 10-year route to settlement *can* remove the NRPF condition, usually through submitting a 'change of conditions' application (see box 4.1).

To qualify for a change of conditions, an individual must demonstrate one of the following.

- That they are destitute.
- That they are at risk of imminent destitution (ie they are unlikely to be able to meet their accommodation and living costs after three months).
- That there are reasons relating to the welfare of a child that outweigh the reasons for imposing the NRPF condition.

- That they are facing exceptional circumstances affecting their income or expenditure.

#### BOX 4.1: MAKING A 'CHANGE OF CONDITIONS' APPLICATION

The change of conditions application is free and can be made online. Further details and evidence requirements can be found on the [UK Visas and Immigration website \(UKVI 2024\)](#).

However, the evidential threshold can be high, and for people who are not confident to submit their application independently (because of language or IT skills for example), it is usually advisable to seek legal advice and support to make an application.

Local authority workers encountering someone who they think may be eligible to lift their NRPf condition should refer them for legal advice.

The [NRPf Network](#) (no date) and the [Unity Project](#) (no date) provide further practical guidance on making a change of conditions application. If someone is unable to access legal advice, they can use these resources to complete a change of conditions application.

#### **Key message on restricted eligibility**

As a result of being subject to NRPf, people on the 10-year route in the North West are:

- refused access to a basic safety net while living, working and bringing up families in our communities
- struggling to meet the costs of basic necessities
- being turned away by local authorities, without being advised that the NRPf restriction can be lifted with legal advice.

As noted by Homeless Link and NACCOM in their report *Unlocking the door* (Corbett 2022):

***"Restricted eligibility is rarely a fixed state and should be treated as a support need to be assessed and addressed."***

Local authority workers should be aware that there are pathways to relieve the financial burden of the 10-year route and be able to signpost to them. They should not let a NRPf condition prevent them from assessing need and, where possible, providing support and guidance. Referring to good quality immigration and welfare benefits advice should be a first port of call when encountering someone on the 10-year route experiencing financial difficulty.

Political leaders should join national calls to end the NRPf condition being imposed by default on people on the 10-year route. At a local level they should pledge a change in culture, committing to end treating NRPf as a barrier to providing support.

#### **IMMIGRATION ADVICE**

***"Our Corporate Plan for 2021–24 commits the combined authority to taking proactive action to tackle inequality, remove barriers and provide opportunities for all of our residents, increase the range of support available to people experiencing poverty, exclusion and inequality; and to improve equality outcomes across all protected characteristics."***

Liverpool City Region (2023a).

The consequences of navigating the 10-year route without legal help can be extreme – and in the worst-case scenario, can lead people to ‘fall off’ the 10-year route, leaving them without a legal immigration status. This is a real possibility for people on the 10-year route, because of the need to renew their limited leave to remain every two and a half years over the course of a decade.

Losing immigration status means that people lose their rights to work or rent, or access benefits or healthcare, and are at risk of facing immigration enforcement. In such circumstances, with both the right to work and to mainstream benefits removed, people face destitution, and the local authority will be their only option for support.

Help from a solicitor or immigration caseworker will mean a better chance of success in applications for leave to remain (see box 4.4) (as well as applications for fee waivers and change of conditions applications to remove NRPF restrictions).<sup>2</sup> Refusals can also be challenged if needed. While people can complete these applications on their own, each one is complex and difficult, requiring a lot of evidence, and is more likely to succeed with good legal advice.

However, there is a dwindling number of providers of immigration legal advice. There is a national crisis in the availability of legal aid as it becomes less and less financially viable, and the North West has the **greatest gap** between demand for immigration legal aid and availability in the country (Wilding 2022). GMIAU is currently the only not-for-profit in the North West with an active immigration legal aid contract. Some smaller organisations are accredited with the Office of the Immigration Services Commissioner (OISC) and can carry out immigration advice. Often staff are qualified to level 1, meaning they can assist with simple applications including change of conditions applications.

Most immigration-related applications, including applications on the 10-year route, are ‘out of scope’ of regular legal aid-funded work. This means that to represent someone on a legal aid basis, a caseworker needs to first apply for exceptional case funding, which is quite a lengthy and burdensome process, therefore making it even harder to find representation.

Private solicitors are a costly option. Solicitors’ fees are often an additional cost to the already burdensome 10-year route fees, leading some people to make the applications themselves, unrepresented. Local authority workers should familiarise themselves with organisations that can carry out immigration advice in their area so that they are able to signpost people to the appropriate level of support.

#### **BOX 4.2: WHO CAN GIVE LEGAL ADVICE?**

Immigration advice is regulated, which means only solicitors or people accredited with the Office of the Immigration Services Commissioner (OISC) are qualified to give legal immigration advice.

Legal advice is specific, direct and proposes a course of action – for example, telling someone they should make a certain application. This is in contrast with sharing general information about options, which is not legal advice.

If you are not a legal professional, it is important not to give legal *advice*, but it is still possible to share legal *information* which will inform someone about possible courses of action. Right to Remain (2022) call this ‘legal

<sup>2</sup> See Public Law Project’s 2021 analysis showing the importance of having more readily available immigration legal aid: <https://publiclawproject.org.uk/content/uploads/2021/04/Legal-aid-briefing.pdf>



support' and have a **helpful guide** to what this might look like for non-legal professionals.

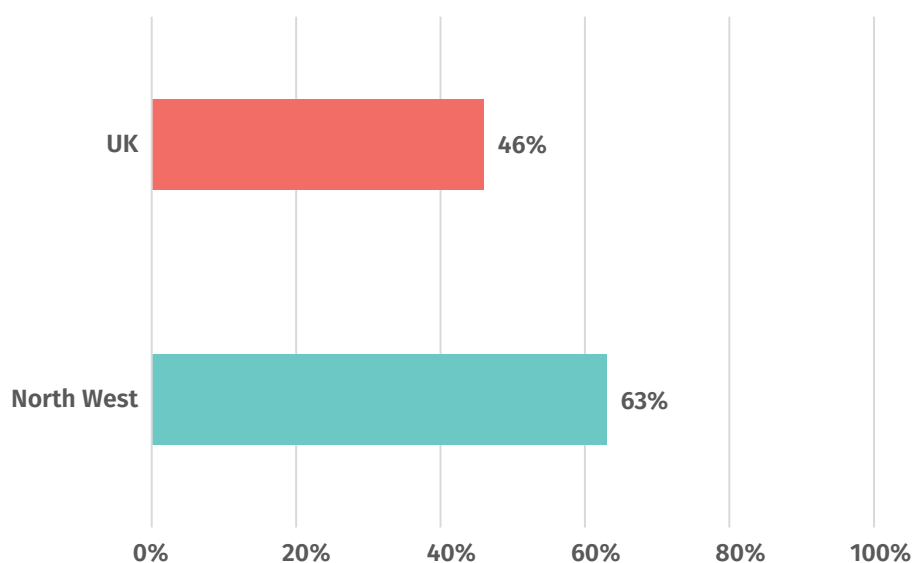
This means that most frontline local authority workers will not be able to act on behalf of people on the 10-year route: they cannot complete applications for leave to remain, changes of conditions or fee waivers. If they are unable to get legal representation, people can complete these forms themselves. Local authority workers can give general information about these processes, direct people to the correct forms or other guidance, refer people to legal advisors, and help people to gather evidence to support their application. If you have questions about the remit of legal support and where it becomes legal advice, please contact GMIAU (no date).

The information given in this briefing aims to help local authority workers to give legal information or support, not legal advice. Often the best option will be for someone to also get legal advice from a legal professional. You can use **this database** (Ministry of Justice, no date) to find a legal aid solicitor and **this database** to find a private solicitor (The Law Society 2024). In certain cases, it will be worthwhile for local authorities to pay the upfront cost of a private solicitor's fees if this would allow someone to support themselves or access benefits in the long run.

In our survey of people on the 10-year route, it was identified that the risk of people losing their legal immigration status was significant due to i) the cost of the route, ii) a lack of knowledge about fee waivers and iii) a lack of access to free legal advice. For people in the North West, survey results show that they were more likely to say that the expense of the route meant that they didn't renew their own or a family member's leave to remain (see figure 4.1). This leaves people exposed to the hostile environment, and at risk of losing their employment, their home and access to free healthcare and other key services.

**FIGURE 4.1: OVER TWO-THIRDS OF PEOPLE IN THE NORTH WEST SAID THAT THE COST OF THE 10-YEAR ROUTE CAUSED THEM NOT TO RENEW THEIR OWN OR A FAMILY MEMBER'S LEAVE TO REMAIN**

*Share of respondents who had decided not to renew their own or another member of their household's leave to remain in the North West vs overall UK sample (% of respondents)*



Source: IPPR analysis of 10-year route survey

Elizabeth started the 10-year route paying private solicitors but was signposted to GMIAU through her church when she moved to Greater Manchester. It was only then that she learned the NRPF condition could be lifted, and that she could apply for a fee waiver for her next application:

***"And that lifted a huge burden from me at that time. I didn't have to find the money to pay for the Home Office fee and lawyer fee and all that."***

But Elizabeth had spent years struggling, without the knowledge that this was available.

***"If I'd known there is a fee waiver or someone can help me to lift the NRPF I would have been okay, the weight would lift. I didn't even know what a fee waiver is, I didn't have any idea."***

Deborah is also represented by GMIAU and emphasised the life-changing difference good legal representation made to her. She said: "I keep saying that to anybody, if [my solicitor] is not there, there's nothing I can do."

On top of the need to meet their commitments to residents, there is a financial incentive for local authorities to ensure people have legal advice to understand and resolve their immigration status and eligibility. Research with 59 local authorities who fund or commission immigration advice in some form found a clear cost benefit of all schemes evaluated (Wilding 2023).<sup>3</sup> Someone resolving or successfully renewing their status ensures they can work to support themselves and be supported to potentially gain access to public funds. NRPF Network (2023) have found that local authorities spend many thousands of pounds per year on supporting households with NRPF – an average of over £17,000 per household per year. Spending a much smaller amount on immigration advice can shift this cost to central government through ensuring people have the right to work and access benefits.

#### **BOX 4.3: GOOD PRACTICE CASE STUDY**

In Greater Manchester, people with NRPF have been supported with legal immigration advice and floating support through the Restricted Eligibility Support Service (RESS)<sup>4</sup> since 2023. Before that, some access to emergency accommodation, support and immigration advice was provided through the A Bed Every Night scheme.

RESS is delivered in partnership with GMIAU, the Booth Centre and Boaz Trust. Between April 2023 and March 2024, 470 people across Greater Manchester received an immigration assessment through RESS and 203 received floating support. Of these, 108 people were supported to make an immigration application, 67 were granted access to public funds and 60 gained some form of legal leave to remain.

By taking seriously the impact of immigration controls and the need for immigration advice, Greater Manchester local authorities are addressing the root causes of homelessness for many non-UK nationals.

3 For different models of funding legal advice and estimated costs involved, see "It's a no-brainer": Local authority funding for immigration legal advice in the UK (Wilding 2023).

4 For further details of the [Restricted Eligibility Support Service](#), see Booth Centre (no date).

#### BOX 4.4: APPLICATIONS FOR LEAVE TO REMAIN

Leave to remain on the 10-year route to settlement is based on people's human rights to private life or family life. This could be as a spouse or partner of a British or settled person, as the parent of a child who is either British or who has lived in the UK for seven years continuously, or on the basis of long residence (ie they have spent over half their life in the UK or have been here for over 20 years).

Fees are payable for these applications. The application fee is £1,048 at the time of writing but set to increase to £1,258 in July 2024. The immigration health surcharge is £1,035 per person per year for adults and £776 for children and must be paid in advance. For adults, this brings the total of one application for one person to £3,635.50 (£3,845.50 from July 2024). If someone is unable to afford these fees they may be able to get a fee waiver (see box 4.5).

If a local authority is in contact with someone who is on the 10-year route to settlement whose visa is due to expire, they should ensure they are referred for immigration advice to make this application. It is very important that they make the application before their leave expires.

Mistakes made on these applications can lead to the person being refused and losing their leave to remain. However, people can consult regularly updated [guidance from GMIAU](#) and [Right to Remain](#) on making private and family life applications.

#### BOX 4.5: FEE WAIVERS

According to Home Office (2022) policy, someone on the 10-year route to settlement is entitled to a fee waiver if “the applicant does not have sufficient funds at their disposal, after meeting their essential living needs, to pay the fee”. In their application they will need to evidence this, including providing bank records and explanations of any large sums being paid in or out.

If an applicant currently has status, they must apply for a fee waiver in the month before their visa runs out. Their status will automatically be extended until a decision is made on the fee waiver. If a fee waiver is granted, the applicant must make the full human rights application within 10 working days. The grant of fee waiver will have a unique code that will be used as part of the application.

If the fee waiver is refused, the applicant must make a full paid application within 10 days. There is no right of appeal against the refusal of a fee waiver, but a lawyer can challenge a refusal with a judicial review. It is essential to seek expert legal advice on the possibilities of such a challenge.

It is not possible to pay for only part of a fee but in a family application, if the applicant cannot afford to pay for all family members, it is possible to request a fee waiver for only some family members. It is also possible to apply to have the immigration health surcharge waived but not the application fee.

This resource from [Right to Remain](#) (2022) goes into more detail on the application process.

### **Key message on immigration advice**

People on the 10-year route are at risk of having the support and security they have found in their communities ripped away from them every two and a half years. Immigration advice is not a panacea: the 10-year route is long, burdensome and stressful even with the help of a good lawyer. But the risk of falling off the route and losing rights completely is greatly reduced with a lawyer's help. Financial hardship can be mitigated with the knowledge and support to make a fee waiver or change of conditions application.

Frontline workers in local authorities cannot give legal advice themselves, but they can provide legal support if they are trained and empowered to:

- recognise key immigration issues
- link people up with legal advice and support, especially when i) their immigration status is causing financial difficulties and/or preventing them from accessing public funds, or ii) someone does not have the funds or ability to renew their leave to remain when it is due to expire
- signpost to self-help resources where someone does not have a legal representative.

Commissioners should understand the importance of legal immigration advice and the long-term savings that local authorities make when they fund it to resolve people's status and financial situations. Commissioners should work to fund and improve the availability of legal advice to people living in their area while political leaders should advocate for solutions to the national legal aid crisis.

## **CHILDREN AND FAMILIES**

***"Our vision is to make Greater Manchester one of the best places in the world to grow up, get on and grow old. This means a place where all children have the best start in life and young people grow up inspired to exceed expectations."***

*Greater Manchester Children and Young People's Plan (GMCA 2019)*

Both Manchester City Council (2024b) and Liverpool City Council (no date) have pledged to become 'child-friendly cities' as part of a UNICEF programme.<sup>5</sup> Additionally, these city-regions have made their own independent commitments to fostering places where children can grow up healthy, safe and with equal opportunities. Local authorities have legal duties under the Children Act (1989) to ensure the safety and welfare of all children, regardless of their nationality or that of their parents. But children whose parents are on the 10-year route to settlement, and whose own immigration status may not be secure, are at risk of losing out. Their parents tell us that their children's health, wellbeing, education and future prospects are being harmed by the 10-year route.

Over three-quarters of those responding to our survey from the North West were on the 10-year route due to being the parent of either a British child (30 per cent), a child who has lived in the UK for at least seven years (28 per cent), or the parent of a child with a serious medical condition (18 per cent). Often, a parent on the route may have a combination of British and non-British children, and – if they have a child who is also on a route to settlement – they will also need to pay fees for them too, severely increasing their financial burden.

Deborah's son has complex learning needs, and she says his immigration status affected the support available to him. While he started school when he came to the

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5 UNICEF's definition of what makes a child-friendly city is one where children "Have a fair chance in life regardless of their ethnic origin, religion, income, gender or ability" (<https://www.childfriendlycities.org/what-is-a-child-friendly-city>)

UK as a teenager, his leave to remain on the 10-year route wasn't confirmed until two years later:

***"So, the social worker had to stop me working, because there's no papers for him, there's no documents for him to get support from the system."***

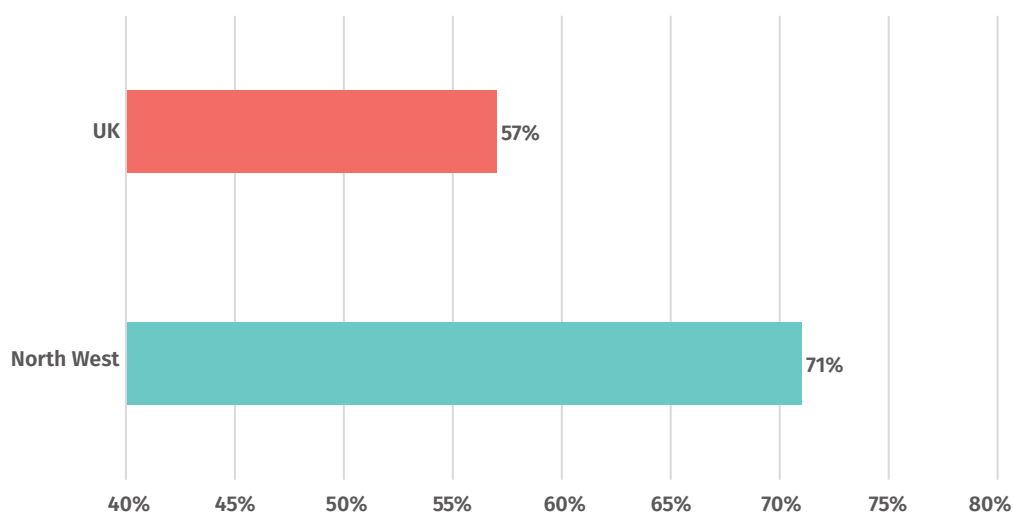
Following advice from her social worker, Deborah stopped working to care for her son, and consequently struggled to cope. Her son should have been entitled to support for his needs regardless of his immigration status, but Deborah's story shows there is a lack of good information about those entitlements available to local authority workers and families on the 10-year route themselves, and the significant knock-on impact this has on people's lives.

### **Poverty**

All but one (98 per cent) of the people on the 10-year route surveyed from the North West had children in their care. Many respondents struggled financially, experiencing difficulties meeting the costs of their utility bills and travel costs for example, and facing severe debt. Notably, people in the North West reported struggling to afford food at a higher rate than the overall national sample (see figure 4.2).

**FIGURE 4.2: SEVEN IN 10 PEOPLE ON THE 10-YEAR ROUTE IN THE NORTH WEST STRUGGLE TO AFFORD FOOD**

*Share of respondents who recorded struggling to meet the cost of food in the North West vs overall UK sample (% of respondents)*



Source: IPPR analysis of 10-year route survey

This means that a large number of children in the North West are in families struggling with poverty caused by their parents' immigration status. Around three-fifths of those surveyed, both in the North West and nationally, said that as a result their children's health had suffered. The same proportion felt that their children's wellbeing and mental health had suffered, their education had been negatively affected and their prospects for the future had been harmed.

People described not being able to pay for opportunities for their children in and out of school – for example, school trips and activities – and more severe

impacts on their children's education, due to being moved around in temporary accommodation leading to lateness and absences.

Children in families with NRPf are eligible for financial support and accommodation from their local authority under section 17 of the 1989 Children Act. Levels of section 17 support can vary widely across local authorities, and the support offered is often inadequate. Local authorities should be aware of a **High Court judgement** made in 2023 in Birmingham, which found that they must consider whether support under Section 17 should be equal to welfare benefits (Central England Law Centre 2023).

### **Childcare**

Childcare provision is also restricted based on immigration status. While all children, including families with NRPf, can access the universal provision of 15 funded hours of childcare for three- and four-year-olds, and can also access 15 funded hours for disadvantaged two-year-olds, families with NRPf are barred from the extended offer of 30 funded hours for three- and four-year-olds of working parents. Families with NRPf are also ineligible for tax-free childcare and for universal credit which can cover up to 85 per cent of childcare costs.

This means that increasingly prohibitive childcare costs have a greater impact on parents with NRPf, many of whom are on the 10-year route to settlement. This affects the ability of parents on the 10-year route to work and provide for their families – and to earn enough money for the thousands of pounds in fees due every two and a half years. People we interviewed told us that if they had more help with childcare, the burden of the route would be eased.

Elizabeth told us that in the years before her NRPf condition was lifted, childcare costs were the biggest burden weighing on her:

***"I think I was being paid £1,200 per month, and I was using £600 to pay for childcare. So imagine £600 for the whole month – it was really hard."***

#### **BOX 4.6: CAMPAIGN SUCCESS: CHILDREN ON THE 10-YEAR ROUTE**

Changes to the 10-year route for people who arrived in the UK as children were made in 2022, with the government acknowledging the severe impact the route was having on children and young people and agreeing that young people who have grown up in the UK were not the intended targets of the policy.

The changes enable children with seven years of continuous UK residence and young people who arrived as children and who have lived in the UK continuously for half of their lives to apply for indefinite leave to remain (ILR) after five years. UK-born children who have lived in the UK continuously for seven years are now entitled to immediate settlement. This was a significant campaign win, acknowledging the harms of the 10-year route, and is potentially life-changing for many young people.

However, the fact that there is no fee waiver available for ILR applications is still keeping young people locked out of status, as *We Belong* (2023) highlight in their Out of the Loop campaign. Members of GMIAU's action group have also spoken about guilt and division within families when, for example, one of two siblings qualified for indefinite leave to remain and the other did not. Additionally, children who have never been on the

10-year route themselves, and including British citizens, are still severely impacted by parents or other family members being on the route.

### **Key message on children and families**

The 10-year route is harming children in the North West – children who are on the route, and children whose parents and other family members are on the route. The 10-year route impacts their education, wellbeing and opportunities, with unknown numbers of children growing up in poverty because they or their parents are not accessing the support that they need.

Local authority duties to children are the same whether children and parents are British or not. The best way to meet those duties is to support parents, ensuring they have the legal advice and resources they need to give their children the best possible start in life.

Frontline workers must be aware of children’s rights and entitlements under the Children Act which are not dependent on immigration status. All local authority early help, education, family and children’s services must be immigration-literate, supported to recognise the specific risks to children caused by the 10-year route, and to take appropriate actions when they are encountered.

## **EMPLOYMENT**

***"We want to see Greater Manchester as a place where people are paid fairly for their work, treated appropriately and provided with inclusive opportunity."***

Greater Manchester Good Employment Charter (2024)

***"Good businesses and a successful economy can only be built if the talents of all are recognised and supported, barriers understood and removed, and talent maximised."***

Liverpool City Region Fair Employment Charter (2023b)

Many people on the 10-year route are key workers. Nationally, our survey found the most common occupations for people on the 10-year route were in health and social care roles, including care workers and home carers, cleaners and domestic workers, and nursing auxiliaries and assistants.

People in GMIAU’s action group and other people who have participated in our research tell us that the financial burden of the route, resulting from visa fees and NRPF, lead people to work long hours in order to make ends meet and stay on the route. This has a detrimental impact on health and wellbeing and family life, and makes people more vulnerable to exploitation.

People said they felt held back in their careers and that they had missed out on opportunities to develop. In the words of a Manchester City Council staff member who attended GMIAU’s listening event, “there is a cost of opportunity as well as a financial cost to people on the 10-year route.” A member of GMIAU’s action group said at that event, “without the 10-year route I think I would have achieved so much more. I would be so much better.”

This is echoed by our survey findings. Twenty-four per cent of people surveyed in the North West said the 10-year route made it harder to *keep* their job. A further 31 per cent found that the 10-year route made it harder for them to *find* a job (12 per cent, five respondents) or harder to find a *permanent* job (19 per cent, eight respondents).

Deborah and Elizabeth both said they would love to study nursing or otherwise progress their careers but are not eligible for UK student loans or home fees. Deborah said:

***"I would have gone for access to nursing, but I can't do it. I was held back from pursuing what I wanted to pursue. I could have been a manager, had a career by now. 10 years."***

Elizabeth said:

***"I have to wait for 10 years before I can achieve my goals. If I had my status, I'd have been a nurse by now. All the people I started with are nurses now and I'm still in my same position due to my status. I have so many things I am waiting to do."***

She has spent years working in Greater Manchester's hospitals. Experiencing long Home Office delays, with her last application delayed by eight months, she described how regular immigration checks made her feel uncomfortable at work:

***"You are always being asked, always being chased for your status. Your manager will be on you, can you send your share code again. It makes you feel like somehow you are not fit for the work."***

The frequency of applications and delays on the 10-year route meant that she could not even take up opportunities for progression that weren't restricted by her status:

***"Even an opportunity to do a course that would take maybe three months or six months, they think very soon your card is going to expire so we can't put you on such a course, 'cause they don't know whether they are going to renew it for you or not."***

In the context of a shortage of healthcare professionals, Elizabeth feels her expertise and knowledge have not been valued and she has not been able to give back as much to her community as she would like.

### **3c leave**

'3c leave' is a temporary form of leave given while someone is waiting for a Home Office decision on some applications. One of the key challenges faced by people on the 10-year route concerning employment arises from i) the requirement to renew their status every two and a half years, and ii) the substantial delays encountered while awaiting decisions on their renewal applications from the Home Office.<sup>6</sup>

Over two-fifths of people on the 10-year route in the North West said that this waiting period makes them feel stressed and anxious, according to our survey findings. An overwhelming 91 per cent of people in the North West reported waiting six months or more for the Home Office to make a decision on their most recent application, with 32 per cent waiting at least a year. During this interim period (and due to no fault of their own) their leave officially expires, leaving them without confirmation that the next period of two and a half years will be approved. Nonetheless, people's rights remain the same, and they have a valid form of temporary leave called 3c leave, which refers to section 3c of the Immigration Act 1971 (see box 4.7).

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6 The Home Office previously operated a service standard which would see this type of application processed within six months. However, since 2022 the service standard has been scrapped and applicants are instead advised on the average length of time it will take for their application to be processed. Applicants on the 10-year route are currently advised that it is taking 12 months for applications to be processed: <https://www.gov.uk/guidance/visa-processing-times-applications-inside-the-uk#family-visas>



In theory, having this form of temporary leave should mean that people's rights to work, (as well as to access benefits, if they have recourse to public funds, and housing) should be unaffected. But in reality, a lack of proof of these entitlements, along with a lack of understanding among employers and service providers, mean people have lost work and have had benefits wrongly stopped due to having 3c leave.<sup>7</sup>

Some employers may see a pending leave to remain application which could be rejected as a risk not worth taking. The right to work rules introduced as part of wider hostile environment policies mean employers may not take chances with forms of leave they do not see as secure, or do not understand.

#### **BOX 4.7: WHAT IS 3c LEAVE?**

3c leave refers to section 3c of the Immigration Act 1971. It ensures that while someone is waiting for a Home Office decision, their rights remain the same as before their leave expired: rights to work, rent, access healthcare, and benefits if they have recourse to public funds. For section 3c to apply, the person must have had valid leave to remain at the time of application and must have made an in-time application.

However, the Home Office does not provide written confirmation of this leave or what it means. There is no physical proof of leave available, and no digital proof that the person applying can access themselves. Employers can use the Home Office's (no date) **employer checking service** (ECS) which will show them that someone has a valid application, but some employers refuse to do so.

**Right to Remain** (2023) provide a template letter for people to explain their 3c leave to their employer.

Local authority workers should be aware both of 3c leave and of the difficulties residents often have with proving that they have it. They should be able to signpost to information and, if necessary, advocate for residents to try to ensure they do not lose employment or housing because of Home Office delays.

#### **Key message on employment**

Because of the 10-year route, people in the North West are:

- out of work due to Home Office delays
- in insecure or low-paid work because their options are limited by their immigration status
- in some cases, in exploitative or dangerous work, feeling beholden to employers who are willing to hire them
- being discriminated against by employers due to a lack of understanding of their immigration situation.

As a result, large numbers of people, often working in vital sectors, face being excluded from the stated aims of regional employment charters. City regions' 'good' or 'fair' employment charters should include commitments not to discriminate against people with leave to remain based on the temporary status of 3c leave.

<sup>7</sup> See RAMFEL's report, *The hostile environment is still in place*, for further details on the challenges of 3c leave: <https://www.ramfel.org.uk/reportonhostileenvironment.html>

Local authority workers should understand the basics of 3c leave and be confident to reassure people of their rights and assert them with employers if needed.

Political leaders should speak out about Home Office delays and the impact they are having on people's employment and wellbeing, joining calls for:

- a reasonable service standard of decision making
- the Home Office to provide written confirmation of an applicant's ongoing rights when their application for further leave to remain is acknowledged.

## HOUSING AND HOMELESSNESS

***"Our city region has a proud tradition of standing up for one another and against injustice. All homelessness prevention activity should place tackling inequalities at its heart. We will proactively recognise the barriers created by gender inequality, poverty, insecure immigration status, racism, disability, homophobia and transphobia that put people at greater risk of homelessness."***

GMCA Homelessness Prevention Strategy 2021–26 (2021)

Our survey findings indicated that there is a heightened risk for people on the 10-year route of experiencing homelessness and housing difficulties. Nationally, over a fifth of people responding had experienced either: losing their home due to being unable to keep up with their rent or mortgage (7 per cent); being forced to 'sofa surf' (18 per cent); or being made street homeless (6 per cent). While these figures are much lower in the North West sample (around three people had experienced one of these), local authorities should nonetheless remain alert to the risk of experiencing housing problems while on the 10-year route.

As a result of the insecure nature of the 10-year route, people may be at greater risk of homelessness or having to put up with poor housing conditions through unscrupulous landlords. One member of GMIAU's action group says:

***"The landlord puts up our rent every year and he knows we can't go anywhere else. We can't get social housing because that counts as a public fund."***

Existing research shows that migrant groups experience homelessness at a rate that outstrips their presence in the overall UK population. According to a report by Crisis, in 2018, non-UK households comprised 33 per cent of the homeless population, despite constituting just 10 per cent of the total population (Boobis et al 2019). Additionally, people with limited leave to remain made up the third-highest number of homeless households in 2018/19. The report also found that homelessness had increased at a higher rate for people with NRPF or irregular status in the previous 12 months.

In order to meet local and regional commitments on homelessness, it is vital that local and combined authorities acknowledge the risks of homelessness associated with immigration policies and restricted eligibilities – and take concrete steps to mitigate these. As NACCOM and Homeless Link note in their report, *Unlocking the door*, it is vital to explore all options to provide accommodation without immigration-based restrictions, unlock solutions through legal immigration advice, and tackle barriers such as a lack of onward referrals for those refused support. As one interviewee in their research summarised, "imagine a world where the first answer isn't 'no.'" (Corbett 2022).

In Greater Manchester, there has been a concerted effort to take the necessary steps to address the homelessness risks faced by people with NRPF. This includes:

- strategic direction from the GMCA homelessness prevention strategy (2021) which specifically highlights NRPf as a risk factor and as leading to inequalities in housing experiences
- the provision of beds specifically for people with restricted eligibilities under the A Bed Every Night (ABEN) emergency accommodation scheme, set up by the mayor of Greater Manchester, Andy Burnham (see Watts et al 2021)
- close partnership working between statutory and voluntary sector organisations, including the Booth Centre and Boaz Trust
- commissioning of legal immigration advice services from GMIAU.

As explored above, people on the 10-year route are likely to be at particular risk of facing housing difficulties or falling into homelessness when they are renewing their leave to remain and awaiting a decision on their application. In the period when they have temporary 3c leave, they are at heightened risk of losing their employment, and in turn their home.

This was Deborah’s experience. She told us that her housing benefits were wrongfully stopped when she was waiting for a Home Office renewal decision and this meant her place in social housing was threatened: “I was in distress because the housing benefits stopped. My solicitor had to send me a letter to the local authority. It was really distressing, being threatened with becoming homeless for a second time.”

For local authority workers, it is crucial to understand where an individual is in their 10-year route journey. This includes understanding the time remaining before they need to renew their leave to remain or when they last applied for leave to remain. Such awareness is essential for gaining clarity on the level of risk individuals may face with regard to homelessness.

### **Key message on housing and homelessness**

People in our communities are more likely to be living in insecure or inadequate housing, or at risk of homelessness, as a result of the financial burdens of the 10-year route, the insecurity created by short grants of leave, and Home Office delays in decision making.

Local authority workers meeting with someone on the 10-year route should:

- make a full assessment of an individual’s eligibility for assistance and avoid assuming that a) an individual on the 10-year route has NRPf or b) that an individual on the 10-year route with NRPf is without options to have the condition removed (see box 4.1 for further details)
- help them to access immigration and welfare advice where they require support to complete a renewal or change of conditions application
- offer information and advice from the local authority housing team to help prevent and/or find a way out of homelessness and to navigate the private rental sector
- Refer on to other teams (such as money advice or children’s services) as relevant, or to other organisations who may be able to provide alternative accommodation support and advice, such as GMIAU, the Boaz Trust and the Booth Centre. Remember that where people are eligible, housing support can be provided under the Children Act (1989) and Care Act (2014).

Political leaders should learn from and expand strategies such as Greater Manchester’s Restricted Eligibility Support Service (RESS), which uses joined-up support and funding for immigration advice to help prevent and tackle homelessness for people with NRPf.

## HEALTHCARE

People on the 10-year route must pay the immigration health surcharge (IHS) as part of their visa application. This has recently increased by 66 per cent. A yearly IHS fee of £1,035 for adults and £776 for children is payable at the point of visa renewal (every two and a half years). This fee entitles people on the 10-year route to free NHS secondary (that is, hospital) healthcare treatment, while free primary care is available to everyone.

However, people on the 10-year route may be at risk of the NHS charging for secondary care if they lose their status due to missing a visa renewal or making a mistake in their application. People who have previously been without a legal immigration status but who have now regularised their status via the 10-year route may have accrued significant debt due to earlier NHS charges. More generally, people on the 10-year route, often from minoritised communities, may face discrimination and incorrect gatekeeping for NHS healthcare services based on wrong assumptions about their immigration status and associated entitlements (see Morris and Nanda 2021).

Beyond entitlements, our survey of people on the 10-year route indicated that the policy has a detrimental impact on people's health and wellbeing. Around 80 per cent of people nationally and in the North West agreed that both their physical health and their wellbeing had been negatively affected by the route.

With striking frequency, people told us that the route had significant consequences for their mental health. People explained that the route made them feel depressed, anxious, worried, stressed and traumatised. By turns, people wrote that being on the 10-year route has "heightened my anxiety [so much] that I am now on medication for it", that the route is "killing me", and that they experience the route "like a punishment". One woman wrote that she felt suicidal.

Deborah told us that when she had to stop working to care for her son, she was hospitalised due to the severe impact on her mental and physical health:

***"I have anxiety, worry, depression, when it comes to my children, my leave. There was a time I was thinking I don't know, I'm gonna pass on. It's too heavy on me."***

### **Key message on healthcare**

The experience of the 10-year route is inherently stressful and has severe impacts, particularly on people's mental health.

Frontline workers should make referrals for specialist help and support to manage these impacts where necessary. This must be accompanied by concrete action to tackle the practical challenges of the route (via referral for immigration advice).

Commissioners in the NHS and public health need to understand the impacts of the 10-year route in order to fulfil local and regional commitments on health for this group.

# 5.

## RECOMMENDATIONS TO LOCAL AUTHORITIES

### FRONTLINE WORKERS

#### Understanding and support

- Equip yourself to understand the challenges faced by people on the 10-year route to settlement, particularly those affected by the NRPF condition. This includes:
  - knowledge of different types of immigration status, the key features of the 10-year route, and the risk and consequences of losing legal immigration status
  - having a basic understanding of the availability of change of conditions and fee waiver applications
  - the ability to identify where immigration advice is needed.
- Proactively work against the assumption that duties do not extend to people with NRPF – do not turn people away from support for this reason, and instead explore their options, including the option of lifting the NRPF condition.

#### Immigration advice

- Prioritise linking people with legal advice, especially when immigration status is causing financial strain or restricting access to public funds.
- Where possible, provide legal support (as opposed to legal advice), by: signposting people to relevant resources (like those linked in this briefing); giving general information about legal processes; directing people to the correct forms or other guidance; referring people to legal advisors; and helping people to gather evidence to support their applications.

#### Healthcare support

- Recognise and address the mental health impacts of the 10-year settlement route, making referrals for specialist help while addressing practical challenges through legal immigration advice and support.

### COMMISSIONERS AND MANAGERS

#### Funding and support

- Children's social care and homelessness commissioners should fund and commission legal advice services, learning from and expanding successful models, like Greater Manchester's Restricted Eligibility Support Service (RESS).
- Allocate funding specifically for the provision of legal advice to lift the NRPF condition for people on the 10-year route.

#### Strategy

- Provide strategic direction and mandatory training to ensure that all community-based services, especially those working with families and children, are supported to:
  - identify where vulnerability is linked to immigration status

- understand basic immigration issues
- signpost individuals to appropriate legal advice and support.
- Explicitly address NRPF in housing and homelessness strategies, and immigration issues in all published strategies.
- Use networks, communications and influencing to combat poor practice by landlords and employers which impacts people on the 10-year route.
- Ensure a joined-up approach across teams within your local authority, and coordinate with other local authorities in the North West by working with the North West Regional Strategic Migration Partnership and combined authorities to implement these recommendations.

## LOCAL POLITICAL LEADERS

### Policy advocacy

- Speak out about the impact of national immigration policies on local authorities and their residents, particularly children, young people, and families. Highlight where the 10-year route is cutting across local commitments to equal, thriving communities.
- Join national calls for change to the 10-year route to settlement, including:
  - capping routes to settlement at five years
  - reducing visa fees to administrative costs and abolishing the immigration health surcharge
  - re-introducing a service standard for decisions on 10-year route applications
  - issuing a certificate of application that evidences ongoing rights and entitlements
  - ending the default use of the NRPF condition.
- Join national advocacy to increase legal aid fees to improve the availability of legal advice and representation.

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