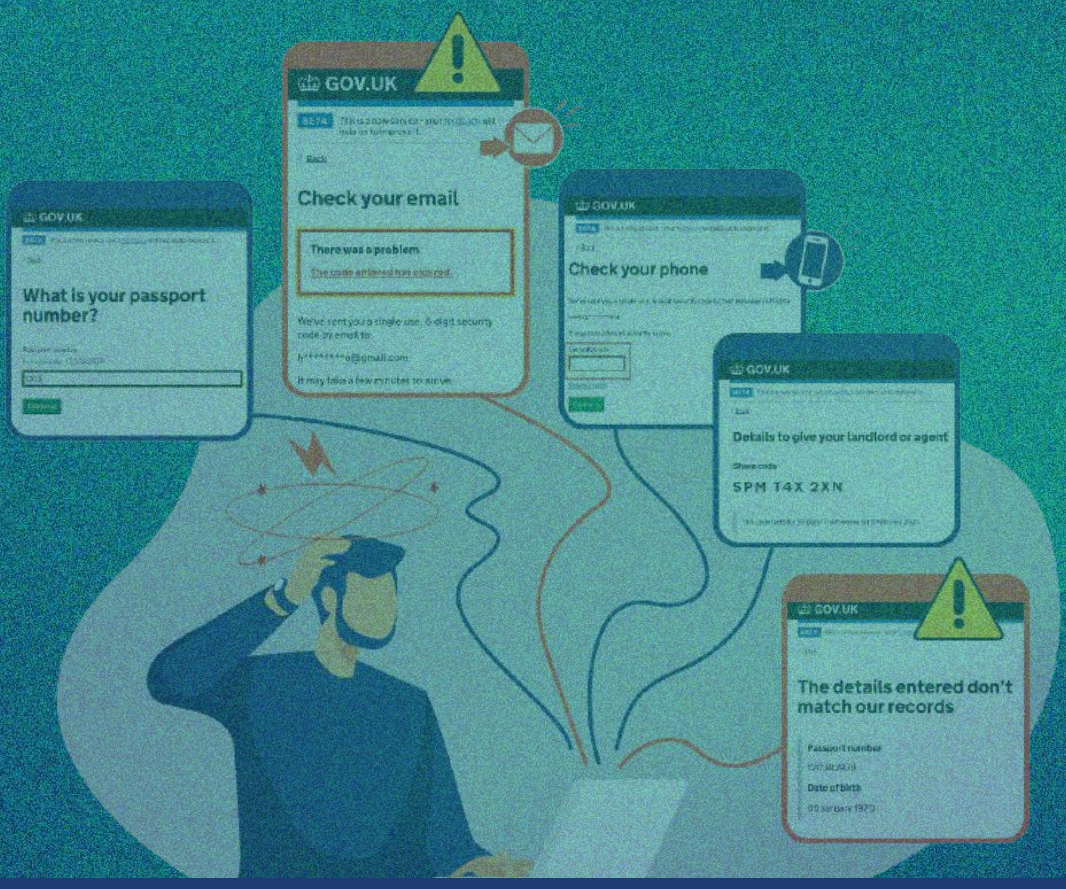
EU Settlement Scheme & eVisa transition

Ten urgent fixes



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Policy briefing

Ten urgent asks for the EU Settlement Scheme and the digitalisation cliff-edge of 31 December 2024

	Description	Cost
1	Everyone with status under the EUSS must be considered to have Withdrawal Agreement rights *(Pg 5 within this doc, or here for separate doc)*	Low cost to Treasury, cost savings to tribunal and court system, large positive impact on small cohort of vulnerable individuals.
2	Clear the persistent EU Settlement Scheme backlog *(Pg 7 within this doc, or here for separate doc)*	Cost saving to Home Office, court system, DWP and other departments.
3	Give full Withdrawal Agreement rights to those waiting in the backlog *(Pg 9 within this doc, or here for separate doc)*	No cost to the Treasury, restoring rights to individuals who are suffering long delays.
4	Restore reasonableness to the 'reasonable grounds' policy regarding late applications to the EUSS *(Pg 11 within this doc, or here for separate doc)*	Cost-saving to the Home Office.
5	A late applicant to the EUSS must not suffer lasting punitive impact if granted status *(Pg 13 within this doc, or here for separate doc)*	Very small cost to the NHS, life-changing effect to affected individuals.
6	Give victims of domestic abuse immediate settlement under the EU Settlement Scheme *(Pg 15 within this doc, or here for separate doc)*	A small cost to DWP which is likely to be offset by cost savings to other statutory services.
7	Mitigate against the travel cliff-edge of expiration of all UK residence cards on 31 December 2024 *(Pg 17 within this doc, or here for separate doc)*	Printing new residence cards comes with a cost, but this is necessary to offset an extremely damaging 'Windrush 2' scandal ahead.
8	Mitigate against the UK Hostile Environment cliff-edge of expiration of all UK residence cards on 31 December 2024 *(Pg 19 within this doc, or here for separate doc)*	Cost of resourcing 24/7 helplines.
9	Protect legacy ILR holders by ensuring continuing validity of their documents while providing option of BRP/eVisa without status review *(Pg 21 within this doc, or here for separate doc)*	Cost-saving to the Home Office.
10	Launch an inquiry into current digital status implementation alongside stakeholder consultation to explore alternatives *(Pg 23 within this doc, or here for separate doc)*	Cost of public inquiry. Alternative proposals are secure and cost-effective.

Executive Summary

In 2016, the lead campaigners of 'Vote Leave' promised:

> "*there will be no change for EU citizens already lawfully resident in the UK. These EU citizens will automatically be granted indefinite leave to remain in the UK and will be treated no less favourably than they are at present.*"

The reality was rather different, as EU citizens and their family members had to apply for a new immigration status through the EU Settlement Scheme (EUSS) if they wanted to stay in the UK, and unless they could already evidence 5 years of residence, they had to make at least two status applications to reach indefinite leave to remain. When the Home Secretary was questioned by the Home Affairs Select Committee in 2019 about why EU citizens were being made to apply for a new immigration status, the answer was:

> *"In a word, Windrush. […] through the EU Settlement Scheme, they will be able to receive a digital document or documentation that will guarantee their rights."*

When the EUSS was introduced by the Government in 2018, it was announced in parliament to be "simple", "straightforward" and "user-friendly". While it is true that, at least initially, the EUSS marked a departure from a Home Office culture of 'looking to refuse', and around 6 million people have been granted EUSS status, it is also indisputable that as time passed, many aspects of the scheme have grown unfathomably complex. An Upper Tribunal judge wrote in early 2023 about the immigration rules implementing the EUSS:

> *"Having spent many hours considering this part of the rules one finds that there is nothing natural or plain about the wording that might reveal its intended meaning".*

As well as becoming ever more complex and confusing, the rules have become stricter, less reasonable, and are failing a cohort who have now become undocumented, through no fault of their own, despite having lived in the UK for decades. For those who are lucky enough to get access to legal advice, appeals and judicial reviews have become the only solution – and the tribunal and court backlogs bear testimony to this.

Secondly, while the EUSS was designed to be the UK's implementation of the Withdrawal Agreement, the previous Government stubbornly insisted that EUSS status does not equate to full rights under the Withdrawal Agreement. This is leading to yet more litigation, as decision makers at DWP and local authorities grapple with the question of how to establish Withdrawal Agreement rights.

Thirdly, the previous Government has rushed headlong towards a self-imposed deadline of 31 December 2024 to fully digitise the UK immigration system. The current implementation of digital immigration status is not fit for purpose, is causing enormous harm to vulnerable individuals, and is dramatically behind schedule in creating eVisas for another estimated 4 million people. There will be travel chaos for those trying to return home to the UK after December, unless the new Government steps up to mitigate the disastrous cliff-edge.

In this document, we present 10 decisive policy asks, none of which require primary legislation, which will go a long way to addressing some of the shortfalls and complexities of the EU Settlement Scheme.

The first set of policy asks centres around fully protecting the rights of those the Withdrawal Agreement was designed to protect:

1. **Everyone with status under the EU Settlement Scheme (EUSS) must be considered to have Withdrawal Agreement (WA) rights**

   The EUSS is the UK's implementation of the citizens' rights part of the WA. Yet the previous Government considered that EUSS status does not equate to being a beneficiary of the WA or automatically demonstrating WA rights. This is the subject of signification litigation and a new Government will have to quickly decide whether it wants to defend the prior Government's position.

2. **Clear the persistent EUSS backlog**

   The EUSS backlog is persistent and growing - there are over 137,000 EUSS applications waiting for a decision, and over 20,000 of these have been waiting longer than a year. Over 60% of the EUSS workload is deciding applications from pre-settled status holders trying to gain the security of settled status. Many vulnerable citizens struggle to meet the raised evidentiary thresholds.

3. **Give full Withdrawal Agreement rights to those waiting in the backlog**

   The WA provides that those who submit a valid EUSS application and are waiting for a decision should have the protection of all their WA rights. This is currently not the case.

4. **Restore reasonableness to the 'reasonable grounds' policy regarding late applications to the EUSS**

   There are still many EU citizens and family members living in the UK who have not realised that they should have applied to the EUSS – simply because they have not encountered a life event that triggers awareness of the scheme, such as changing jobs or travelling and returning to the UK. A repeat of the Windrush scandal is underway, for this cohort of people whose late applications are rejected due to the prior Government's unreasonable policy.

5. **A late applicant to the EUSS cannot suffer lasting punitive impact if granted status**

   A late applicant who is granted EUSS status, because the Home Office recognised that they had a reasonable ground for missing the deadline, can nevertheless be left encumbered with life-destroying debts to the NHS. This can even happen to children, whose parents did not know to make an application for them, or elderly people whose first awareness of the scheme is through a hospital admission.

6. **Give victims of domestic abuse immediate settlement under the EUSS**

   People who suffer domestic abuse from their partner, who hold pre-settled EUSS status, are able to obtain access to public funds, but need to switch to an immigration status outside the EUSS. This removes their evidence of WA protection. Victims from abuse by other family members are excluded.

The second set of asks focuses on the problems created by the UK's rushed digitalisation of immigration status:

7. **Mitigate against the travel cliff-edge of expiration of all UK residence cards on 31 December 2024**

   The implementation of Electronic Travel Authorisation at exactly the same time as ending all physical proof of immigration status will create a disastrous cliff-edge on 31 December 2024.

8. **Mitigate against the UK Hostile Environment cliff-edge of expiration of all UK residence cards on 31 December 2024**

   There are 4 million people who currently have residence cards that need to gain access to an eVisa by the end of the year or risk facing the full force of the hostile environment. The rollout is years behind schedule and the Home Office databases are suffering many technical errors.

9. **Protect legacy ILR holders by ensuring continuing validity of their documents while providing option of BRP/eVisa without status review**

   Some of the UK's oldest migrant population hold legacy (non-biometric) documentation. The digitalisation programme will curtail their rights to travel and return to the UK unless they go through an extremely onerous Home Office application, which is unjustifiable and potentially discriminatory.

10. **Launch an inquiry into current digital status implementation alongside stakeholder consultation to explore alternatives**

    Lessons must be learnt from the EUSS, which introduced the online-only process to prove immigration status. Tens of thousands of people have suffered lost jobs and job opportunities, lost housing, refusal of a university place or funding, denied boarding back to the UK and more.

1. Everyone with status under the EU Settlement Scheme must be considered to have Withdrawal Agreement rights

What?

The Withdrawal Agreement offered the UK and all EU Member States the choice in how to protect the rights of the EU and British citizens respectively, resident in their host country before December 2020. The UK selected the 'constitutive' choice, which meant that it could require every EU citizen and their family member to apply for a new residence status that confers the rights under the Withdrawal Agreement. The Government created the EU Settlement Scheme (EUSS) to implement that new residence status.

The UK currently considers that some people with status under the EUSS are part of the 'true cohort' and have Withdrawal Agreement rights, whereas others are part of an 'extra cohort' and only have a domestic UK immigration status. They argue EUSS status indicates that someone may theoretically have Withdrawal Agreement rights, but these rights are conditional upon satisfying stricter requirements than the EUSS eligibility requirements.

The problem is that when the Home Office grants status under the EUSS it does not make this distinction, and status holders receive a decision letter stating that their status is granted "in accordance with the EU exit separation agreements." The stricter requirements for having Withdrawal Agreement rights are not communicated to EUSS status holders, and are not conditions to be adhered to for keeping their EUSS status.

So firstly, nobody has clarity over whether they have Withdrawal Agreement rights or not, which arguably means the EUSS does not lawfully implement the Withdrawal Agreement. And secondly, people are not informed about a stricter set of requirements they should fulfil in order to have, and to keep, protection of the Withdrawal Agreement.

The solution is to treat all EUSS status holders the same, which includes ensuring that **everyone** with EUSS status has full equal treatment rights.

Why?

Improving EU-UK relationship

This issue with the UK's interpretation of the Withdrawal Agreement has been a fundamental sticking point for the EU since at least 2021 and it has been raised at the EU-UK Specialised Committee on Citizens' Rights (e.g. see Joint Statements on the meetings of 17 June 2021, 16 September 2021, 24 January 2022, 4 December 2023 and 6 June 2024).

Impacted citizens

Citizens with pre-settled status under the EUSS usually only find out that they do not have Withdrawal Agreement rights at the point of needing help from the State, when they are refused Universal Credit, Housing or Homelessness Assistance. They likely face a spiral into destitution unless given the help they need.

Why not? Reasoning behind UK Govt position and why we disagree

The Home Office states that they did not want to create any *new* rights for EUSS status holders who have been in the UK for less than five years. We disagree - the UK made a choice to implement a constitutive

system, forcing UK residents who previously had free movement rights to apply for a new status. This system gave the UK the control it sought, namely to be able to refuse status. The UK must accept the consequence of this choice, by conferring unambiguous rights to those with status.

Cost?

Fixing this issue will mean that some people with pre-settled status will become eligible for welfare and housing that were not before. There are less than 2 million people with pre-settled status, and this cohort is shrinking every month as people go on to be granted settled status and become eligible to benefits through that status. A proportion of this cohort will be eligible for welfare and housing anyway, through being able to demonstrate a legacy EEA Regulations right-to-reside. So this affects a subset of a shrinking cohort of vulnerable people.

On the cost savings side, because the existing legislation around the right to reside test is so complex, many decisions are going to court. The3million has intervened in three legal challenges on this already. One judge, on granting permission on our intervention, wrote: "*.. having to deal with decisions and the reviews of decisions on the same basis multiple times is itself a financial burden that will be alleviated with certainty on the point one way or the other. I also bear in mind that this burden is being multiplied throughout England and Wales, which burden caused by uncertainty is falling on the public purse.*"

How?

- ☐ Primary legislation
- ☐ **Secondary legislation**
- ☐ Immigration Rules
- ☐ **Guidance change**

The detail

We propose setting out in a legally binding way that all EUSS status holders are beneficiaries of the Withdrawal Agreement.

Some other (secondary) legislation then becomes incompatible with the rights of Withdrawal Agreement beneficiaries. In 2019, a series of statutory instruments were passed to ensure that pre-settled status under the EUSS is excluded as a 'right to reside' for the purposes of determining eligibility for various state assistance. People instead must prove an alternative 'right to reside' which derives from legacy EEA regulations. For example, these SIs would need to be revoked:

- Social Housing and Homelessness Assistance (England) - The Allocation of Housing and Homelessness (Eligibility) (England) (Amendment) (EU Exit) Regulations 2019
- Social Housing and Homelessness Assistance (Wales) - The Allocation of Housing and Homelessness (Eligibility) (Wales) (Amendment) (No 2) Regulations 2019
- Social Housing and Homelessness Assistance (NI) - The Allocation of Housing and Homelessness (Eligibility) (Amendment) (Northern Ireland) (EU Exit) Regulations 2019
- Universal Credit and income related benefits (England, Wales, Scotland) - The Social Security (Income-related Benefits) (Updating and Amendment) (EU Exit) Regulations 2019
- Universal Credit and income related benefits (NI) - The Social Security (Income-related Benefits) (Updating and Amendment) (EU Exit) Regulations (Northern Ireland) 2019
- Child Benefit and Child Tax Credit (UK) - The Child Benefit and Child Tax Credit (Amendment) (EU Exit) Regulations 2019

2. Clear the persistent EU Settlement Scheme backlog

What?

The EU Settlement Scheme backlog has never dropped below 122,380 applications, and the most recent published statistics show that the backlog has now *risen* to 137,040 applications. Almost 21,000 of these had been waiting longer than a year.

Additional to this is those waiting for a decision on Administrative Review (where latest published figures show around 14,000 still outstanding - half of which had been waiting for longer than a year), and the applications currently under appeal (no data available).

Over 60% of the EUSS decision workload in the last published quarter was on 'upgrade' applications. These are applications from people who have already successfully demonstrated that they were eligible for pre-settled status, but are being held to a raised evidentiary threshold to show a footprint of five years of residence. 15% of these applications do not result in a grant of settled status.

We propose a pragmatic approach of granting settled status automatically to those who were already granted pre-settled status and have held that status for five years.

Why?

The impact on citizens is significant. On top of crippling anxiety while waiting months for a decision, they are denied many rights in the meantime. Most are prevented from travelling abroad because they would be refused entry back to the UK. In theory, they have some (but by no means all) residence rights. In practice, employers and landlords are reluctant to engage with those without secure immigration status, and other entities such as DWP, local authorities and Student Finance England make inconsistent decisions due to inadequate guidance.

It is the most vulnerable persons who struggle the most with the upgrade process - both in understanding and evidencing 'continuous residence'.[1] The COVID pandemic was unprecedented, and led to patterns of absence from the UK that were unique to each individual, difficult to evidence and even more challenging to fit into predetermined Home Office guidance on acceptable absences.

Considerable Home Office resources could be freed up by automatically granted settled status on the 5-year anniversary of a grant of pre-settled status, where there are no significant new suitability issues that have arisen in those 5 years. Furthermore, this would relieve significant pressure on local authorities, DWP decision makers, tribunals and the rest of the court system, and Home Office grant-funded organisations.

Why not? Reasoning behind UK Govt position and why we disagree

We presume the Home Office is concerned that there could be a backlash if they are seen to relax eligibility conditions. We believe it is very easy to explain to the British public that those who the Home Office had accepted had a right to live in the UK were now, five years on, being given their right to remain in the UK indefinitely, subject to suitability checks.

[1] E.g. 'Roma EU citizens in the UK: Ongoing struggles with the EU Settlement Scheme (May 2024)' available at https://www.romasupportgroup.org.uk/uploads/9/3/6/8/93687016/policy_report_version_2.pdf

There will likely be a set of individuals who are granted settled status who would not otherwise have been eligible, but we cannot see how that can possibly weigh up against an alternative set of vulnerable individuals who are left with insecure immigration status, whose rights will become more precarious over time.

Cost?

This will be a cost saving to the Home Office, the court system, the DWP and other departments.

How?

- ☐ Primary legislation
- ☐ Secondary legislation
- ☐ **Immigration Rules**
- ☐ **Guidance change**

The detail

Change the Appendix EU Immigration rules such that:

> Anyone who has held pre-settled status for a period of five years is eligible for a grant of settled status, subject only to:
>
> - No known serious suitability issues relating to the applicant's conduct ***since*** their grant of pre-settled status
> - Declaration by the applicant of their current residence or intended continued residence in the UK

Create an automated process to automatically upgrade pre-settled status holders to settled status based on the above eligibility criteria.

Change the manual application process and EUSS caseworker guidance so that any pre-settled status holder who applies for settled status is considered by the above eligibility criteria.

3. Give full Withdrawal Agreement rights to those waiting in the backlog

What?

Article 18(3) of the Withdrawal Agreement very clearly sets out that individuals who have made a valid application for their new residence status under the EUSS should have the benefit of all the residence rights set out in the Withdrawal Agreement while they wait for a final decision, including if they are waiting for the outcome of an Administrative Review or Appeal process.

Although citizens who are waiting for a decision have some rights, such as the right to work, rent and access NHS healthcare, there are several rights that are denied them. These rights are all integral to being able to exercise residence rights in the UK, the lack of which can hamper employment duties, and they include:

- The right to travel and return to the UK
- The right to apply for a driving licence, or exchange an expired EU driving licence for a UK one
- The right to apply for an EHIC card
- The ability to update their digital UKVI account with a new identity document

Other rights are available in theory, but in practice are obtain very hard to access due to inadequate Government guidance, and inconsistent decision making:

- The right to obtain a National Insurance number
- The right to access welfare and housing benefits

If EUSS applications were dealt with very promptly, the lack of these rights would perhaps be a temporary inconvenience. However, many people wait months or even years for a decision – over 10,000 people had been waiting for more than 2 years as at the end of December 2023 (the latest statistics available). People suffer terrible stress and anxiety while waiting for their status to be confirmed.

We propose a number of simple adjustments that will ease some of the practical difficulties that citizens in this situation face, by ensuring all these rights are available to them while they wait.

Why?

Improving EU-UK relationship

On travel, the European Commission clearly stated its view[2] in April 2024 those waiting for a final decision have "a right of entry and residence in the host State", and that they are aware of "the UK's underlying view that such persons do not have a right of entry into the UK based on the Withdrawal Agreement". They go on to state they are "in contact with the UK with a view to resolving this matter".

Impacted citizens

By being denied the right to travel, many are missing out on important family events outside the UK including funerals, and many are unable to fulfil duties that are part of their employment.

[2] https://www.europarl.europa.eu/doceo/document/E-9-2024-000062-ASW_EN.pdf

Similarly, being unable to apply for driving licences, or exchange an expired EU licence with a British one, means many are left unable to take up employment opportunities. In some cases people are unable to effectively care for a family member and have been unable to drive them to hospital when faced with unacceptable ambulance delays.

Citizens waiting for status should in theory be able to receive welfare benefits but are frequently denied as the guidance on those waiting for a decision is unclear.

Why not? Reasoning behind UK Govt position and why we disagree

The previous Government has sought to limit these rights pending application in various ways, initially denying them altogether to late applicants before having to U-turn in August 2021 following pressure from both civil society and the EU Commission. Other examples included putting extra barriers in accessing the rights to work and rent, and denying National Insurance numbers to those waiting for a decision.

We are unclear why the previous Government resisted implementing Article 18(3) in full, so that people who are awaiting a grant of status are still denied certain rights including travelling and returning to the UK, and obtaining driving licences.

Cost?

This will be a cost saving to the Home Office, the court system, the DWP and other departments.

How?

- ☐ Primary legislation
- ☐ Secondary legislation
- ☐ Immigration Rules
- ☐ **Guidance change**

The detail

The new Government should ensure that those who have submitted a valid application to the EUSS, as evidenced by a Certificate of Application (CoA), should have access to all residence rights under the Withdrawal Agreement, including supporting rights that the residence rights depend on. Given that holders of a CoA can create share codes in exactly the same way as holders of EUSS status, the required policy changes should be extremely easy to implement.

These include:

- Travel - change Border Force and carrier guidance to allow non-visa nationals, and visa nationals who submitted in-country EUSS applications, to board carriers and enter the UK with a CoA.
- Driving licences - mandate DVLA to issue driving licences and provisional driving licences to citizens with a CoA.
- European Health Insurance Cards (EHICs) – mandate DHSC to issue EHICs to citizens with a CoA.
- Change the Home Office systems such that CoA holders can correctly update their UKVI account with a new travel document.
- Improve all departmental and local authority guidance such that eligibility for obtaining National Insurance numbers, and welfare and housing benefits is clarified for CoA holders.

4. Restore reasonableness to the 'reasonable grounds' policy regarding late applications to the EUSS

What?

In August 2023, the Home Office changed the EU Settlement Scheme (EUSS) to make it much harder for people who missed the June 2021 deadline to submit late applications. However, the changes went far too far, preventing genuine late applicants from being granted the rights to stay in the UK that the Withdrawal Agreement had envisioned. Despite some limited Home Office row back in early January 2024, it is still the case that many applicants are prevented from acquiring status, due to a very *unreasonable* interpretation of the '*reasonable grounds*' policy on late applications.

This proposal would make some simple changes to the EUSS guidance that will stop August 2023 policy changes from affecting the very people the Withdrawal Agreement was supposed to protect.

Why?

The tightening of the policy and its (possibly unintended) consequences affects mostly people who have been living in the UK for many years, and who simply did not realise that they were supposed to apply to the EUSS. This includes, just as a non-exhaustive example list:

- EU citizens who had Home Office cards from years or even decades ago;
- Non-EU family members (again, with Home Office documentation) who were aware of the EUSS but thought it applied just to EU citizens;
- People who were genuinely unaware because they either did not follow or understand the implications of Brexit;
- People who were born outside the EU, moved to the EU and naturalised as EU citizens but don't necessarily identify as such. Many did not understand that their legal rights to live in the UK were contingent on their EU citizenship.

It is only when people encounter a 'trigger event' that they realise they lack the legal right to remain in the UK unless they gain EUSS status. Just as we saw with the Windrush scandal, these trigger events can happen many years after changes in policy and legislation. There are still an unknown (but suspected large) number of people who have not changed jobs or home since Brexit, who have not had to update a driving licence, who have not travelled, who have not required hospital treatment or welfare benefits. This is borne out by the more than 215,000 successful grants of status to late applicants over the last three years, including over 10,000 in the last published quarter.

Not to protect these people through some simple policy changes risks leaving people undocumented and subject to the full force of the Hostile Environment.

Why not? Reasoning behind UK Govt position and why we disagree

The Home Office's stated reason for doing this was to ensure that those who are clearly not eligible for EUSS status do not receive a Certificate of Application (CoA) that enables them to work in the UK while their applications are considered.

It is clear that this change of policy is catching those it wasn't designed to catch, and therefore there should be no reason whatsoever not to implement the proposed changes and bring the EUSS in line with the rest of

the Immigration Rules. People who have clearly been part of UK society for many years cannot possibly be considered to be making 'spurious' applications to gain a temporary CoA.

Cost?

This can only be a cost-saving measure for all. For the Home Office there would be savings in EUSS caseworkers, and dealing with judicial reviews proceedings. For charities and support organisations, it would relieve some of the pressures they are facing, as challenging rejected EUSS applications is taking up an unnecessarily large part of their workload. The grant funding provided by the Home Office to the four organisations operating at national level[3] is for OISC level 1 work only, meaning that these organisations often cannot assist with these challenges.

How?

- ☐ Primary legislation
- ☐ Secondary legislation
- ☐ **Immigration Rules**
- ☐ **Guidance change**

The detail

Therefore, while it is open to the Home Office to reject as invalid an application made by someone who is clearly ineligible to the Scheme, the EUSS must be constructed to ensure that ***anyone*** who would otherwise be eligible is able to submit a late application - even if their only reason for missing the deadline is "I did not know".

Therefore we propose the following changes to the EU Settlement Scheme Caseworker guidance[4]:

- Anyone with legacy Home Office documentation such as EEA residence cards or historic proof of ILR should have a reasonable ground without more to make a valid late application to the EU Settlement Scheme.
- Remove the negative weight of repeat applications; many people who have made repeat applications will have done so without legal advice or with incorrect legal advice, or will have struggled to evidence their residence evidence. The Withdrawal Agreement (Art. 18(1)(o) imposes a duty on the authorities to help people prove their eligibility, and frequently this has not happened.

We also propose a change to the EU10(1) of the Appendix EU in the Immigration Rules, which - consistent with other UK immigration routes - introduces discretion to treat an application as valid, by simply changing the word '**will**' to '**may**':

> *EU10. (1) An application made under this Appendix **may** be rejected as invalid where it does not meet the requirements in paragraph EU9.*

[3] https://www.gov.uk/government/publications/eu-settlement-scheme-community-support-for-vulnerable-citizens/list-of-organisations

[4] https://www.gov.uk/government/publications/eu-settlement-scheme-caseworker-guidance

5. A late applicant to the EU Settlement Scheme must not suffer lasting punitive impact if granted status

What?

The UK Government did not know how many people were in the UK with free movement rights, as it had never required EU citizens to undergo any registration process. All these millions of people have now been asked to apply for a new UK immigration status, and not doing so has severe consequences, tipping them into the hostile environment. It was therefore right that the Home Office made provision for late applications where it considered there were reasonable grounds to have missed the deadline. The Home Office for example explicitly recognises that children may not have had an application made on their behalf by their parents or, for children in care or care leavers, by their local authority, and they have stated such children will automatically be recognised as having a reasonable ground for a late application.

However, there remains a serious lacuna at the heart of late applications, even when reasonable grounds for missing the deadline are accepted, and status is granted. Namely, the period between the date someone *should have* applied (which is either the EUSS deadline date of 30 June 2021, or 3 months after birth or entering the UK for joining family members), and the date they *submit a valid application,* remains forever 'unlawful' in the eyes of the UK Government.

One particularly egregious consequence of this is that any treatment for secondary NHS healthcare incurred during the period remains chargeable. If already paid, it is not to be refunded. If not yet paid, the debt continues to hang over the status holder. These debts can be life changing. The policy is irrational and detrimental, and is very easily fixed through a secondary legislation change.

Why?

Improving EU-UK relationship

The EU stated clearly in the Specialised Committee on Citizens' Rights "*its position that those late applicants who are ultimately granted residence status should be treated as lawfully resident in the period between the application deadline and granting of the status*."

Impacted citizens

Some examples: Babies whose parents don't know to apply, or are unable to submit an application within 3 months of their baby's birth can incur charges of thousands of pounds if they require secondary healthcare. Elderly citizens who, due to not travelling, changing jobs or renting accommodation, only first become aware of the need to apply to the EUSS when admitted to hospital in a medical emergency. In all cases, once someone becomes aware and submits an application, they will be impacted forever by debts they would not have incurred had they made their application in time. This seems an extreme, long-lasting punishment.

Why not? Reasoning behind UK Govt position and why we disagree

We are not sure why DHSC has refused to change this policy. The erstwhile Home Secretary Priti Patel denied that the policy worked this way, and the erstwhile Immigration Minister Kevin Foster said: "*if someone has been found to have a reasonable ground for a late application, it would be hard to then hold against them a penalty in the form of not getting access to treatment or being deemed an overstayer. That would seem a*

bizarre outcome that I cannot imagine any court would uphold." And yet that is exactly what happens, and DHSC has restated its position on this even after these Home Office statements to Parliament.

Cost?

We cannot cost this precisely. However, this affects a relatively low number of people who are disproportionately impacted. The impact of a charge worth thousands of pounds to an individual is devastating and potentially life-changing. The cost to the NHS is extremely small in relation to its budget of £180 billion, especially as some of these charges on the most vulnerable may ultimately prove unrecoverable (while even if not recovered, the debt never leaves the individual).

How?

- ☐ Primary legislation
- ☐ **Secondary legislation**
- ☐ Immigration Rules
- ☐ **Guidance change**

The detail

Amend section 13A of The National Health Service (Charges to Overseas Visitors) Regulations 2015 (https://www.legislation.gov.uk/uksi/2015/238), such that charges made or recovered during the period which begins on the person's application deadline and ends on the date on which their application under Appendix is made, are cancelled or refunded if the person is successfully granted status under Appendix EU.

6. Give victims of domestic abuse immediate settlement under the EU Settlement Scheme

What?

Family members of EU citizens can apply for and maintain immigration status under the EUSS where their relationship breaks down because of domestic abuse. The last Government introduced protections for victims of domestic abuse under the EUSS in June 2020 allowing victim-survivors to retain their right of residence after domestic abuse related relationship breakdown. Despite this critical protection, more needs to be done to support victim-survivors under the EUSS.

The first problem that continues to undermine protection for victims of domestic abuse under the EUSS is that they are not given automatic entitlement to public funds. This can be remedied by giving victims of domestic abuse with pre-settled status entitlement to welfare benefits and housing so that they can obtain safe accommodation and financial independence away from the perpetrator of abuse, without which many are unable to flee abuse or risk destitution.

The second problem is that victims of domestic abuse under the EUSS cannot apply for settled status immediately on relationship breakdown leaving them with a more precarious pre-settled status. The last Government attempted to address this problem in April 2024 by giving some family members with pre-settled status as a spouse or partner the option to apply for indefinite leave under the domestic immigration route of Appendix Victim of Domestic Abuse. However, this approach was flawed in so far as it requires those pre-settled status holders to give up their EUSS status to access settlement under another immigration route, and also does not apply to other family members, namely children, parents and relatives of EU citizens. The only effective remedy is to change the EUSS rules to create an immediate route to settlement for all family members whose relationship has broken down because of domestic abuse.

Why?

Migrant victims of domestic abuse whose immigration status is based on a family relationship risk losing their immigration status and destitution on exiting their abusive relationship. Migrant victims of domestic abuse need a secure immigration status, in their own right, that is not dependent on a continuing relationship with their abuser, and they need access to welfare benefits and housing to help them obtain safe accommodation and financial independence from their perpetrator of abuse.

Victims of domestic abuse with pre-settled status should not have to give up their EUSS status to access other immigration routes that offer them public funds and settlement, yet this is what the last Government's policy response requires. It puts victims of domestic abuse with pre-settled status at risk of losing their Withdrawal Agreement rights in practice because, without EUSS status, they would no longer be able to effectively evidence them. All Governments must now learn the lessons of the past and ensure people with rights have them properly evidenced. By far the best and simplest way of ensuring people with Withdrawal Agreement rights can prove them is by allowing them to keep status under the EUSS, and not requiring them to switch into another immigration category in order to access protection as a victim of domestic abuse.

Why not? Reasoning behind UK Govt position and why we disagree

We are not sure why the last Government decided not to offer victims of domestic abuse immediate settlement under the EUSS and instead require them to switch immigration status in order to access public funds and settlement. We believe it may be because it wanted to implement the minimum protection

necessary following the outcome of a settled legal claim[5] in which it had agreed its policies discriminated against a partner with pre-settled status who did not have access to public funds or settlement on domestic abuse related relationship breakdown. It is also likely to relate to the last Government's position that EUSS status does not confer Withdrawal Agreement rights on anyone, which would instead have to be proven at any future point in time with reference to stricter requirements than the EUSS eligibility requirements.

We believe it is unworkable to expect anyone, let alone victims of domestic abuse, to be able to prove Withdrawal Agreement rights without having a valid immigration status that specifically confirms them. The current expectation that victims of domestic abuse in the years ahead will be able to provide continuous evidence from 31 December 2020 to the present day of their family relationship and their abuser's employment is beyond absurd and demonstrates a complete failure to understand domestic abuse or a total lack of genuine desire to protect victims of it.

Cost?

Making this change will mean that some victims of domestic abuse will become eligible for welfare benefits and housing, some months or years before they would otherwise have been. This is believed to be a very small group. Furthermore, the cost saving to other statutory and government-funded services would likely off-set this cost. For example, at present where victims of domestic abuse with pre-settled status cannot access public funds and settlement, they would instead rely on accommodation and support from a Local Authority or other grants awarded to domestic abuse services.

How?

- ☐ Primary legislation
- ☐ **Secondary legislation**
- ☐ **Immigration Rules**
- ☐ **Guidance change**

The detail

We propose an amendment to Appendix EU, the Immigration Rules relating to the EUSS, to create an immediate route to settlement for victims of domestic abuse who satisfy sub-paragraph (e) of the definition of a 'family member who has retained the right of residence' in Annex 1 of Appendix EU. This would allow victims to apply for settled status as soon as their qualifying relationship has broken down permanently because of domestic abuse, rather than having to complete a continuous qualifying period of five years. Consequential changes to the main EUSS caseworker guidance would also be required.

In addition, changes to secondary legislation relating to welfare benefits and housing would be required to disapply the prohibition on pre-settled status holders accessing welfare benefits and housing assistance thereby allowing those with pre-settled status as a family member to access benefits and housing when their relationship has broken down because of domestic abuse, even while they apply for and await their grant of settled status.

[5] https://www.centralenglandlc.org.uk/News/ddv-concession-home-office-ruling

7. Mitigate against the travel cliff-edge of expiration of all UK residence cards on 31 December 2024

What?

For the past decade, the Home Office has short-dated all its biometric residence cards (BRCs) and biometric residence permits (BRPs) to 31 December 2024 even when people's permission to enter and remain in the UK extends beyond that date or is indefinite. The initial rationale was because encryption technology on these cards had to comply with new EU standards, but following Brexit this would no longer have been required. The Home Office continued with the short-dating practice because of its aim to fully digitise the UK immigration system by the end of 2024.

On 1 January 2025, there will be a sudden change in the carrier liability rules. Until that date, carriers decide whether to allow visa nationals to travel to the UK by inspecting their physical visa documents. After that date, they will be dependent on a computer system called interactive Advance Passenger Information (iAPI) to look up an individual's eVisa and return an 'OK to Board' message. Not all carriers have yet integrated with iAPI, and the system has not been extensively and widely tested - carriers are unwilling to use it currently to allow people to board who for various reasons are not in possession of a current physical document but who do have an eVisa.

Additionally, millions of people with valid leave to enter and remain in the UK do not yet have an eVisa. The program to transfer everyone to an eVisa is behind schedule. Furthermore, tens (possibly hundreds) of thousands of people with eVisas suffer technical issues with their Home Office records and are unable to use them to correctly prove their status.

Urgent mitigation measures are required to avoid a disaster after 1 January 2025 where people are unable to return home from their travels abroad. In the absence of such measures, a huge scandal will begin to unfold straight after the 2024 Christmas holidays.

Why?

Improving EU-UK relationship

The EU has consistently raised concerns about denial of boarding for Withdrawal Agreement beneficiaries who are entitled to travel with a national identity card (see Specialised Committee statements of 16 September 2021 and 15 June 2022). In the most recent meeting of 6 June 2024, the EU raised existing travel incidents, and both parties discussed the impact of the upcoming EES, ETIAS and ETA systems on Withdrawal Agreement beneficiaries.

Impacted citizens

All the following cohorts will face severe obstacles travelling back to the UK from 1 January:

- Visa nationals who have obtained an eVisa but where carriers are not sufficiently integrated with new iAPI systems, or iAPI systems fail.
- Those who have not successfully managed to access their eVisa by 31 December 2024.
- Those who have an eVisa but whose immigration records are technologically broken or inaccessible, or subject to the recently uncovered 'merged identities' flaw affecting tens of thousands of individuals on the Home Office database.

- Those who have a working eVisa but are not aware that they should keep it permanently updated with their latest travel document, or who have been unable to do so for lack of digital literacy, Home Office technical failures, or being requested to physically post their travel document to the Home Office.

Why not? Reasoning behind UK Govt position and why we disagree

To date, the Home Office has not wanted to admit the extent of the failures and delays of their immigration digitalisation program. They are, understandably, unwilling to resume printing millions of BRCs and BRPs due to cost and logistics. They are also, perhaps understandably, unwilling to allow expired BRCs and BRPs to be accepted by carriers and other checking agents.

However, 31 December 2024 was a self-imposed deadline, for which the UK has had over 5 years to prepare. Persons who have every right to live and work in, and travel out of and back to, the UK **cannot** become the victims of this digitisation programme.

Cost?

- Most of the recommended changes do not come with a cost, other than the opportunity cost of collecting ETA application fees and carrier fines, and relieving carriers from the cost of returning passengers who are refused entry to the UK.
- Printing new biometric residence cards and permits will of course have a unit cost per card, which will be known to the Home Office.

How?

☐ Primary legislation
☐ Secondary legislation
☐ Immigration Rules
☐ **Guidance change**

The detail

There is no legislation to be changed, all recommendations are a matter of Home Office policy changes. The mitigation measures include:

- Delaying the rollout of the Electronic Travel Authorisation and Universal Permission to Travel programmes - which require carriers to determine the permission of each and every passenger before allowing them to board and travel to the UK.
- Changing carriers' liability regulations such that carriers are mandated to accept physical documents that expire on 31 December 2024.
- Changing carriers' liability regulations such that carriers are not fined, or held responsible for the cost of returning passengers who are refused entry to the UK, if those passengers were in possession of a valid travel document, and a physical visa that expired on 31 December 2024.
- Resume the issuance of physical documents (BRPs and BRCs) until a safe and fit-for-purpose digital status is available to all individuals with leave to remain in the UK. Existing proposals for alternative implementations are already available, based on secure QR Code technology. These give the status holder a secure, cost-effective proof of status, accessible at all times.
- Provide a 24/7 helpline for anyone struggling to set up a new eVisa, or to prove their rights through an eVisa
- Provide a 24/7 helpline accessible from abroad to anyone struggling to travel back to the UK.

8. Mitigate against the UK Hostile Environment cliff-edge of expiration of all UK residence cards on 31 December 2024

What?

All biometric residence cards (BRCs) and biometric residence permits (BRPs) are set to expire by 31 December 2024 even when people's permission to enter and remain in the UK extends beyond that date or is indefinite.

The Home Office is requiring the holders of these documents - an estimated 4 to 5 million people - to apply for an eVisa in order to access their rights in the UK after 31 December 2024.

The rollout of this transfer programme is already severely behind schedule, so millions of people with valid leave to enter and remain in the UK do not yet have an eVisa. There are many accounts of technical problems for those attempting to transfer to an eVisa. Even for those who do obtain an eVisa, the EU Settlement Scheme has shown there are many technical problems with the Home Office's databases underpinning the online-only status.

Urgent mitigation measures are required to avoid a disaster from 1 January 2025 where people will lose jobs, job opportunities, housing, benefits and more. A transition period must be created during which expired documentation is accepted. 24/7 helplines must be set up and sufficiently resourced.

Why?

Someone with an expired BRP/C who does not have an eVisa will be unable to prove their right to work, to rent in England, to apply for or renew a driving licence, to open a bank account, or to prove their entitlement to other decision makers. This is because without an eVisa, they will be unable to generate a 'Share Code'. Many are already receiving (incorrect) communications from DWP that their benefits will be terminated upon expiry of their BRP/C.

Even though these individuals have the right to remain in the UK, they will effectively become undocumented and face the full force of the Hostile Environment, in a direct repeat of the Windrush scandal.

Why not? Reasoning behind UK Govt position and why we disagree

The Home Office have remained emphatically committed to the provisions of the Hostile Environment, including recently significantly increasing fines and criminal sanctions for employers/landlords for employing/letting accommodation to people without proof of immigration status. This new Government must make bold decisions to avert a huge disaster caused by the Home Office's self-imposed deadline of 31 December 2024, by either altering the Hostile Environment policies, or at a minimum mandating the acceptance of documents that expire on 31 December.

Cost?

There is no cost to the Treasury to alter the Hostile Environment or mandate the acceptance of immigration documents that expire on 31 December 2024.

Not to do so is likely to incur the cost of significant litigation against the Home Office.

However, funds will be required to provide appropriate resources for 24/7 Home Office helplines.

How?

- ☐ Primary legislation
- ☐ Secondary legislation
- ☐ Immigration Rules
- ☐ **Guidance change**

The detail

There is no legislation to be changed, all recommendations are a matter of Home Office policy changes. The mitigation measures include:

- Suspend the provisions of the Hostile Environment including changing the Guidance for Employers and Landlords to no longer require them to inspect anyone's immigration status in order to obtain a statutory excuse against civil or criminal liability.
- Alternatively, at a minimum, change the Guidance for Employers and Landlords to accept expired BRPs and legacy ILR documentation.
- Change the logic of the Right to Work / Right to Rent websites such that expired BRPs can be used to generate a share code, and ensure that such share codes correctly generate evidence of the right to work/rent to employers/landlords.
- Provide a 24/7 helpline for anyone struggling to set up a new eVisa.
- Provide a 24/7 helpline for anyone struggling to prove their rights through an eVisa or expired immigration document.

9. Protect legacy ILR holders by ensuring continuing validity of their documents while providing option of BRP/eVisa without status review

What?

The Home Office is requiring all UK residents with physical proof of immigration status to transfer to a digital eVisa. Those with biometric residence permits are invited to set up a UKVI account in order to link to their eVisa, which is an administrative process.

However, indefinite leave to remain (ILR) holders with legacy documentation - for example stamps / vignette stickers in passports or old letters from the Home Office - are required to make a 'no time limit' (NTL) application to the Home Office before they can obtain an eVisa. These applications are onerous, requiring evidence of continuing residence in the UK since the grant of their ILR.

We propose that firstly, this legacy documentation must remain valid for proving immigration status within the UK. Secondly, the Government must pause its implementation of the 'Universal Permission to Travel' scheme, and maintain its current policy of only checking documentation for non-visa nationals at the UK border. The alternative is to mandate all carriers to accept legacy ILR documents as proof of UK immigration status. For those who do want to transition to an eVisa, we propose a straightforward swap of legacy documentation, without an application process or status review.

Why?

ILR holders with legacy documentation form the UK's oldest migrant population. NTL applications typically require the submission of decades of evidence of UK residence, which many will be unable to provide. Women, the elderly, those lacking digital literacy and other vulnerable citizens will be disproportionately affected.

It is unjustifiable and potentially discriminatory that this cohort is subjected to a review of their status by way of an NTL application. These people will very typically have kept hold of their old documents precisely because of struggling with technology or engaging with the Home Office. It is not their fault or choice that the Home Office is moving with speed towards a digital-only status, yet they are now being mandated to undergo an onerous process with severe risk of refusal and becoming undocumented through lack of sufficient historical evidence of UK residence.

To date, non-visa nationals with legacy documentation have been able to travel out of and back to the UK, because their legacy documentation is accepted at the UK border. However, if these individuals do not apply for an eVisa, as it stands they will be unable to travel and return to the UK once the UK implements its 'Universal Permission to Travel' (UPT) scheme. This is because UPT is aimed at 'pushing the border upstream' and preventing anyone from boarding if they are unable to prove their immigration status to their carrier. The system delivering this proof is 'interactive Advance Passenger Information' (iAPI) and requires an eVisa. UPT is timetabled to commence as soon as the Electronic Travel Authorisation (ETA) scheme is fully rolled out, in 2025.

Why not? Reasoning behind UK Govt position and why we disagree

We are unsure why the Home Office is unwilling to waive NTL applications for those with legacy ILR documentation, in the context of the eVisa deadline of 31 December 2024. We would consider that it would be in the Home Office's own interests to do so, since it will save considerable case working resources.

Cost?

NTL applications are free, so there is no opportunity cost in not requiring this cohort to submit an NTL application. We believe that this will only be a cost-saving to the Home Office through the savings in case working.

How?

- ☐ Primary legislation
- ☐ Secondary legislation
- ☐ Immigration Rules
- ☐ **Guidance change**

The detail

All immigration status checkers within the UK, for example the NHS, must be instructed to continue accepting legacy documentation.

Carriers must be instructed to continue allowing non-visa nationals to travel to the UK without checking their immigration status. Effectively, this is a pause to the rollout and full implementation of Electronic Travel Authorisation (ETA) and Universal Permission to Travel (UPT) schemes. In the alternative, carriers must be instructed to accept legacy ILR documentation when doing UPT checks for non-visa nationals.

Allowing for a straightforward swap of legacy documentation for a BRC and eVisa only requires a policy change, which is to not require anyone with legacy ILR documentation to submit a 'no time limit' NTL application. Instead the Home Office must allow those with legacy documentation to set up a UKVI account, and in turn gain access to an eVisa, only by supplying their legacy documentation and making a statement of truth that they are currently residing in the UK or have not lost their ILR since they were last in the UK.

10. Launch an inquiry into current digital status implementation alongside stakeholder consultation to explore alternatives

What?

Digital-only status was first issued to the millions of EU citizens applying to the EU Settlement Scheme, and is now rolling out to all migration routes, with the aim of UK migrants having digital-only status by the end of 2024. The current implementation does not give the status holder a proof of status which is under their control. They do not have for example a *digital document* secured by QR code technology akin to a Covid Pass that they can show from their phones or even print out as a backup especially when travelling.

Instead there is a need to repeatedly engage with an *online-only process*, logging onto a GOV.UK website with two-factor authentication to receive a 9-character share code which must then be given to whoever is seeking to check their status to input into a different GOV.UK website before status is displayed. This system is not fit for purpose. It is inaccessible to many, and recent media reports have shown that the underlying Home Office data systems are seriously compromised.[6]

A public inquiry should be launched into the impacts caused by the prior government's introduction of the current system which became a barrier to accessing rights in July 2021. A stakeholder consultation process must be urgently set up to look into alternative implementations that give the status holder a secure, cost-effective proof of status that is accessible at all times. There are existing proposals ready to be explored.

Why?

Improving EU-UK relationship

Although the EU-UK Withdrawal Agreement allows for a digital document, questions have been raised at the Specialised Committee over the UK's current implementation of digital status. See statements of 24 January 2022, 15 June 2022, 25 May 2023, 4 December 2023.

Impacted citizens

Vulnerable and digitally-excluded people are seriously impacted by this implementation. For some, the two-factor authentication code is sent to whoever helped them apply for the status several years ago, rendering the proof of status inaccessible. In many situations, a lack of WiFi or broadband signal leaves proof of status out of reach. For tens, possibly hundreds of thousands, their records on the Home Office database have been compromised leading to errors when trying to view or prove their status.

Why not? Reasoning behind UK Govt position and why we disagree

The Home Office has rejected alternative proposals (based on secure QR code technology as used in the Covid Pass app) because they are "*committed to a digital system of real-time checks, and we will not compromise on this principle.*" In direct contrast, we assert that there is a need for a digital system which is ***not*** real-time, until it is the case that the Home Office status databases are always available, 24/7, no-one's

[6] Guardian (2024) Home Office immigration database errors hit more than 76,000 people, available at https://www.theguardian.com/uk-news/2024/mar/14/home-office-immigration-database-errors-hit-more-than-76000-people

digital records are broken, and everyone including the most vulnerable has access to technology, internet and digital know-how.

The cost of real-time checks is currently being paid by thousands of people who *have* rights but are unable to *demonstrate* them - just as happened in the Windrush scandal. In any case, the principle of real-time checks is entirely unnecessary and illusory even on its own terms. An employer for example can check someone's status on day one, and will not need to re-check that status for a considerable length of time - during which it could be revoked. So whether the employer check on day one is a real-time one, or a check based on an alternative offline implementation which may have a very short lag in showing revocations, is entirely immaterial.

Cost?

We would anticipate an inquiry into current digital status implementation to be at the lower end of the range of public inquiry costs.

The cost of developing an alternative implementation of digital status can be estimated by considering the cost of developing the Covid Pass, which has similar functional and technical requirements. The Covid Pass was developed in house by DHSC and DHSC Arm's Length Bodies for £25 million[7].

How?

- ☐ Primary legislation
- ☐ Secondary legislation
- ☐ Immigration Rules
- ☐ Guidance change

The detail

Set up a public inquiry into the:

- development of the current digital proof of status, initially based on a 2018 right to work beta trial and now being rolled out to all migrants resident in the UK;
- security and integrity of Home Office databases underpinning digital proof of status;
- efficacy of Home Office support services for digital status, including the UKVI Contact Centre and the EU Settlement Resolution Centre;
- scale and depth of impacts faced by individuals unable to prove their status and thereby denied their right to work, rent, study, travel, access benefits and healthcare and more;
- lack of stakeholder or parliamentary consultation before imposing the current digital proof of status on a cohort of several million EUSS status holders;
- validity of the Home Office 'exclusion of liability' on UKVI accounts;[8]
- Equality Act implications of the current proof of digital status.

Details of the alternative proposal of digital status implementation as proposed by the3million:

- 'Our proposal for fixing the digital status' available at https://the3million.org.uk/our-proposal-fixing-digital-status.

[7] https://www.whatdotheyknow.com/request/dhsc_development_of_covid_pass_d#incoming-2464632
[8] https://www.gov.uk/government/publications/ukvi-account-terms-and-conditions

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