

HOUSE OF LORDS

Justice and Home Affairs Committee

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1st Report of Session 2026–27

# Settlement, Citizenship and Integration

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Ordered to be printed 9 June 2026 and published 23 June 2026

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Published by the Authority of the House of Lords



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Evidence is published online at <https://committees.parliament.uk/work/9453/settlement-citizenship-and-integration/>.

Q in footnotes refers to a question in oral evidence.

## SUMMARY

Settlement, citizenship, and integration are complex and controversial topics in the UK, stemming as they do from the consequences of immigration policy. Much of the public debate focuses on the levels and types of migration to this country. Successive governments have created immigration policies reactively, with a focus on headlines and short-term, siloed aims. There is however an underlying issue of at least equal significance: the pathway to settlement and citizenship, and the integration of migrants into the general population. That issue is not always given the attention it deserves. It is the subject of this report.

The salience of these issues is repeatedly demonstrated in polling. They touch not only on quantitative issues relating to the economy, access to and performance of public services, housing, and many others, but also on qualitative issues such as fairness, community, and what it means to be a positive member of society. Views, often deeply held and principled, are held by many in society, and disparate conclusions are regularly reached. Given this, it is unsurprising that there are points in this report that we were unable to reach a consensus on. For a full list of points of disagreement, as well as for votes on the final report, see Appendix 4.

The Government have proposed to extend the path to settlement for many, increasing the baseline qualifying time for indefinite leave to remain (ILR), and suggest introducing criteria which would reduce or add to the time it takes to qualify. While a minority of the Committee support the Government's proposals, believing this would retain appropriate incentives and disincentives for migrants, and limit the fiscal impact of migration and asylum; the majority do not, and believe alternatives should be explored, believing extending timelines would undermine integration, increase poverty amongst low-income migrants, and risk increasing the unauthorised population. This is covered in Chapter 3.

The Government has also proposed to apply these changes retrospectively, to those already in the UK and on the route to ILR. The majority of the Committee disagree with this proposal, believing it to be manifestly unfair and would adversely impact the UK's reputation; while the minority support it, considering the challenges currently facing the UK. This is covered in Chapter 4.

Despite some differences in principle, this report also demonstrates that there is much that we can agree on in relation to the settlement, citizenship, and integration debate. In fact, there is far more that unites us than divides us, and we believe strongly that consensus is possible, even on such emotive and deeply held topics. Problems with data is one such area of consensus. Our report opens by setting out the migration context and noting key gaps in data, which may undermine the Government's overarching efforts to address citizenship and settlement issues in the UK. In Chapters 1 and 2, we argue that in the absence of good data, misinformation on migration and settlement flourishes, hampering both people's ability to understand the situation, and to make informed policy decisions. We believe that the Home Office should restart publishing data on exit checks as a matter of urgency, to clarify the number of migrants who are in the UK and the number of overstayers. Alongside this, better linkage between departments in how they manage and share data will provide clarity, which will be essential in developing effective government policy.

Chapter 5 looks at the Government's current policy proposals to introduce an 'earned settlement' system in the UK. While we are not against earned settlement in principle, we set out ways the Government could improve its approach if it moves forward with introducing this new system. We also examine the finer detail of the Government's earned settlement proposals, reflecting on how to ensure people earn settlement while promoting integration. We believe strongly in the power of work and language to promote integration, arguing that the Government must provide the conditions to enable migrants to work and learn English, and that migrants must seize these opportunities. We also believe that children who arrive at a young age and grow up in the UK should usually be granted settled status by 18, and regret the continued absence of a strategy for integration in England.

Chapter 6 explores the route to settlement and citizenship, considering the costs people face, the complexity of the system, and the hoops people have to jump through to gain the right to settle in the UK. We make recommendations about the Life in the UK test, citizenship ceremonies and the test for deprivation of citizenship. Finally, Chapter 7 looks at the Home Office and how it creates policy, arguing that the Home Office is too reactive and has failed to set out the impact of its proposed and actual policies, making it challenging for parliament or the public to scrutinise. We also call for the Home Office to work more effectively with the rest of government.

Considered, proactive, compassionate, and responsible policy in this area is possible. We do not feel that successive Governments have always lived up to these ideals in this area. How Governments, migrants, and the receiving society conduct themselves matters at least as much as how many people migrate to the UK and from where. These are difficult issues. They are not impossible issues. We can and must do better. On that, we all agree.

# Settlement, Citizenship and Integration

## CHAPTER 1: INTRODUCTION

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### About our inquiry

1. This inquiry is about settlement, citizenship, and integration in the UK. The Committee started planning the inquiry in the summer of 2025, after the publication of the *Restoring Control over the Immigration System* White Paper in May 2025.<sup>1</sup> This was followed in November 2025 by the release of the policy paper *Restoring Order and Control: A statement on the government's asylum and returns policy*<sup>2</sup> as well as the launch of the *A Fairer Pathway to Settlement* consultation, which covered many of the proposed changes in the White Paper.<sup>3</sup> While these three developments form an important part of the report, the report does not seek to assess all aspects of the proposed changes.
2. Rather, the questions the Committee wished to address were around what happens to people once they come to the UK and determine that they wish to make the UK their permanent home. This report does not therefore suggest proposed targets for net migration, or comment on the intricacies of what visas should be assigned to which groups. The focus of the inquiry is related to the point after entry, and the process through to permanent settlement, either through Indefinite Leave to Remain (ILR) or citizenship, rather than the many migrants who come to the UK temporarily to work or study and leave when their visas end, nor does it include those coming as tourists, those coming for conferences, or those coming on exchange visits.
3. The Committee has endeavoured to remain dispassionate throughout this inquiry, and has drawn its conclusions and recommendations on the basis of the evidence it has received, and research articles drawn to our attention. However, we are acutely aware that few issues are as emotive and life changing as migration. The Committee is proud that the UK is a place that so many wish to call their home, either as a result of working and studying here, joining family or loved ones, or fleeing the threat of persecution. The diversity of the UK is one of its great strengths, and the Committee acknowledges the cultural, social, professional, and fiscal contributions of many migrants—both those who come temporarily and those who settle permanently—to life in the UK.
4. However, the Committee is also conscious that there are many in the UK who are alienated and discomfited by the change in their communities. The civil unrest seen in Stockport in 2024 and Epping in 2025 is evidence of what happens when people feel that their concerns on these issues are not heard, and that they have no influence on the composition and cohesion of their own communities. Furthermore, the many acute challenges facing the UK: difficult fiscal conditions, an ageing population, public services operating at

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1 Home Office, *Restoring control over the immigration system: white paper*, [CP 1326](#), May 2025

2 Home Office, *Restoring Order and Control: A Statement on the government's asylum and returns policy*, [CP 1418](#), November 2025

3 Home Office, *A Fairer Pathway to Settlement: statement and accompanying consultation on earned settlement*, [CP 1448](#), November 2025

capacity, and an increasingly uncertain world mean that the government is operating with stretched resources. Migration interacts with these challenges, alleviating challenges in some respects whilst simultaneously exacerbating in others.

5. Considering the complexity and challenges of this topic, it is unsurprising that we were unable to come to a consensus on several key issues. In several cases the Committee voted on conclusions and recommendations to be included in the report, and several members abstained from voting that this be the report of the Committee. These divisions are set out in Appendix 4.
6. Over the course of our inquiry, we held 11 evidence sessions, speaking to 20 witnesses, and received over 600 written submissions. Of these submissions, around 500 were from those directly affected by the proposed changes to the immigration and asylum rules. Due to the deeply personal nature of many of the submissions, and the need to safeguard many vulnerable people, we have not published them. However, we have carefully considered the points raised, and a summary of the key issues is reproduced as Appendix 5.
7. We are disappointed with the limited engagement from the Home Office with our inquiry. Despite the Immigration White Paper being a flagship policy of the Home Secretary, we received no written evidence from the Home Office, bar two short letters clarifying some points after the Minister's Oral Evidence session, despite repeated requests. It is also concerning that the Home Secretary was unavailable to appear before the Committee due to 'diary pressures', despite an invitation being sent at the beginning of November 2025 and the inquiry concluding in March 2026. The fact the Home Office sent a minister whose portfolio only covers half the brief—rather than the Secretary of State, or the two ministers (Mike Tapp MP and Alex Norris MP) who cover all of it—does not suggest a co-ordinated department with clear lines of responsibility, nor one that welcomes a critical friend.
8. Our Specialist Adviser for this inquiry was Dr Ben Brindle, researcher at the Migration Observatory based in the University of Oxford. He has published and been interviewed widely on the subject of migration, including on settlement, language, fees and the labour market. We are immensely grateful for his insight and support.

### **Report structure**

9. This chapter sets out information regarding the report and inquiry, and the key migration context needed to understand settlement policy as a whole.
10. Chapter 2 then sets out ways the Government could improve the collection and use of data on migrants and their outcomes.
11. Chapters 3 and 4 focus on two key interventions the Government has proposed. Chapter 3 examines the plan to extend the baseline time for which people are required to live in the UK before they can access Indefinite Leave to Remain from 5 to 10 years, or longer. Chapter 4 looks at the Government's plan to apply these proposals retrospectively.
12. Chapter 5 explores the concept of 'earning' settlement—reducing the period of time required through meeting certain criteria, or increasing it in some instances—and how this is expected to affect integration. We then explore

opportunities beyond the white paper to improve integration outcomes, and consider the lack of a current integration strategy from the Government.

13. Chapter 6 examines the route to citizenship as seen by the migrant, the associated costs, and the view of citizenship as seen by the state. In Chapter 7, we explore the role of the Home Office in managing the immigration system, as well as the cross-departmental challenges associated with settlement and citizenship.

### **The migration context**

14. Issues around migration are currently politically salient, in the UK, and in many other countries. Few issues exercise the public's imagination, their hopes and concerns, as much as immigration. Yet the language and facts are often misrepresented, not least by the media, and poorly understood, by government, by the media, and by the public.
15. Different terms mean different things to different people. To be clear what we mean in this report, a detailed glossary can be found in Appendix 6.
16. In addition, many people's understanding of the numbers surrounding migration is factually incorrect. As Sunder Katwala, Director of think tank British Future, told us: "Everyone knows that immigration was at record levels under the last Government. Few people know that we have [more recently] seen record levels in the overall fall; most people do not know that has happened and do not think that has happened".<sup>4</sup>
17. Although this report is not about migration numbers, we have thought it necessary to provide some numerical context since how issues discussed throughout the report (language provision, fees, governmental capacity and capability) are handled inevitably depends on the number of people they relate to.

### *Visas, ILR and citizenship*

18. 'Temporary visas' allow individuals to come to the UK for a specific purpose, typically either work, study, or to be with family already in the country. People on several common temporary visa routes, including most work and family visas, are subject to the 'No Recourse to Public Funds' (NRPF) condition, which restricts access to most types of welfare support. They also have to pay the Immigration Health Surcharge (IHS), which allows them to access the NHS, and may have to pay for their visas to be renewed. The fees associated with visas are explored, to some extent, in Chapter 6.
19. Some people with a temporary immigration status can request the Home Office to lift the NRPF condition from their visa through a process known as 'change of conditions.'. Those with specific types of visas are eligible to apply, such as those who have a visa on the basis of family or private life, or those with a BN(O) visa. Those on other visas may apply on discretionary grounds, but may risk losing their visa if refused. NRPF can be lifted if: the applicant is destitute or at risk of imminent destitution; a child's essential needs cannot be met due to insufficient income; or there are exceptional financial circumstances. People on five-year family visas who had their

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4 [Q 4](#) (Sunder Katwala)

NRPF condition used to be automatically moved to a ten-year route to ILR, but this has not been the case since 2022.<sup>5</sup>

20. Indefinite Leave to Remain (ILR), also known as settlement, may be an end goal, or a staging post between a temporary visa and British citizenship. There are several main benefits for migrants who acquire ILR. People with ILR do not have to pay the IHS to access the NHS, and NRPF does not apply to them—they are eligible for the same welfare entitlements as British citizens. They can also work in the same way as citizens, are eligible for home fee status at UK universities, and can vote in some elections.<sup>6</sup> Unlike most temporary visas, ILR is a more secure immigration status as it does not need to be renewed, though it can lapse if individuals are absent from the UK for more than two years.
21. Currently, to acquire ILR, migrants must have lived in the UK on a qualifying temporary visa for a certain period, usually five years, with migrants' dependants eligible for ILR at the same time as the main applicant. Individuals can also qualify for ILR if they have lived in the UK and held a series of visas<sup>7</sup> for a continuous period of 10 years—known as 'Long Residence'. In most cases, applicants must have also passed the Life in the UK test, although this does not apply to certain individuals, such as those with refugee status, who instead need to pass the test only to acquire British citizenship.
22. These rules to be granted ILR apply to non-EU citizens, as well as EU citizens who arrived after free movement ended on 31 December 2020. The settlement rights of EU citizens who arrived before the end of 2020 are governed by different rules under the UK-EU Withdrawal Agreement.<sup>8</sup>

**Table 1: Current common Visa Routes**

Route	Time in UK prior to settlement	English Language Requirements	Life in the UK test
Skilled Worker	5 years	B2 at entry, B2 at settlement (B1 for applications before 26/03/2027)	At settlement
Global Talent	3–5 years	None at entry, B2 at settlement (B1 for applications before 26/03/2027)	At settlement
Hong Kong BN(O)	5 years	None at entry, B2 at settlement (B1 for applications before 26/03/2027)	At settlement

5 Migration Observatory, University of Oxford, *Deprivation and the no recourse to public funds (NRPF) condition*, November 2023

6 Though different rules apply to Irish and Commonwealth citizens.

7 As discussed in Table 1, not all visas lead to settlement. The 10 year-long residence route covers those who may have started on visas that do not count towards settlement. For example, 2 years on a child student visa, followed by 4 years on a student visa, and 2 years on a graduate visa. If the person moved to a skilled worker visa, they would not have to wait 5 years for settlement but would be eligible after 2 years via the 10-year long residence route.

8 Migration Observatory, University of Oxford, *Migrant Settlement in the UK*, February 2026

Route	Time in UK prior to settlement	English Language Requirements	Life in the UK test
Private Life (adult)	10 years	None at entry, B2 at settlement (B1 for applications before 26/03/2027)	At settlement
Family life (partner, parent)	5–10 years	None at entry, B2 at settlement (B1 for applications before 26/03/2027)	At settlement
Protection	5 years	None	At citizenship
Long residence	10 years	Dependent on entry route requirements, B2 at settlement (B1 for applications before 26/03/2027)	At settlement
Student	Does not lead to settlement	At entry: B1 below degree level, B2 at undergraduate degree level or above	N/A

Source: Home Office, [Immigration Rules](#), February 2026 [accessed 12 May 2026]

23. To apply for citizenship, an individual would typically have to have had ILR for 12 months. Citizens have a number of further rights:

- The right to vote in all UK elections and referendums (those on ILR may only vote in some elections, depending on whether they are Commonwealth citizens and on which of the devolved nations in the UK they live in);
- The right to stand for Parliament and public office;
- The right to possess a British passport;
- The right to British consular assistance abroad;
- The right to leave the UK for any duration without losing the right of abode (those on ILR may not leave for more than two years at a time and those on the EU Settlement Scheme may not leave for more than five years at a time);
- The right to avoid deportation (except for those subject to a Deprivation of Citizenship Order);
- Children born overseas automatically acquire British citizenship provided either parent is a British citizen (children born in the UK automatically acquire British citizenship provided either parent has ILR, but do not acquire it if born overseas).<sup>9</sup>

24. However, the distinction in rights between those with citizenship and those without is not clear cut, particularly for Irish and Commonwealth citizens. Sunder Katwala told us that Irish and Commonwealth citizens have greater voting rights than EU permanent residents with settled status.<sup>10</sup> Irish citizens

<sup>9</sup> Written evidence from Laura Devine Immigration ([SCI0550](#)) and Bindmans LLP ([SCI0348](#))

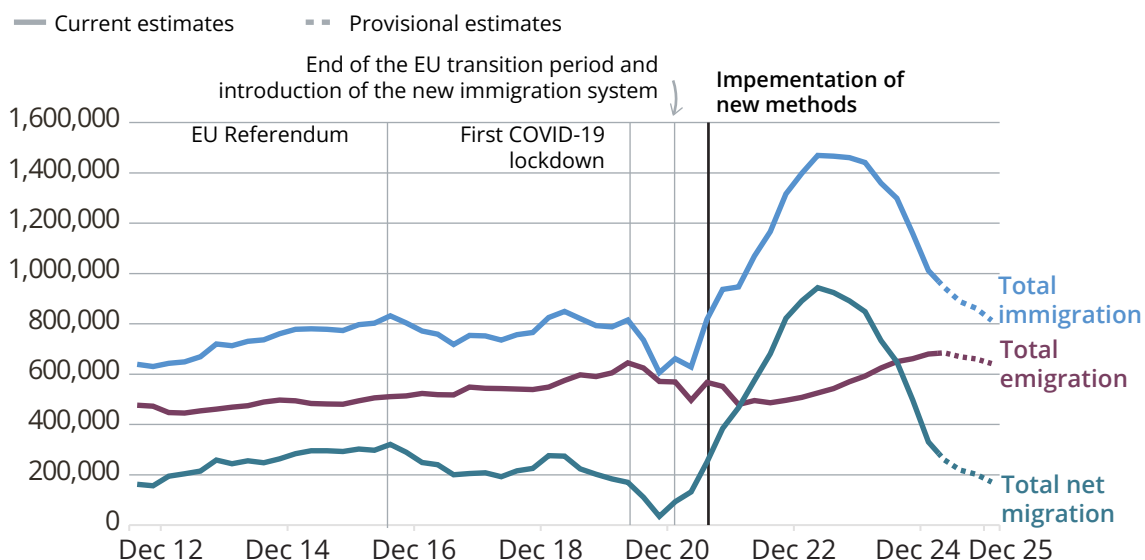
<sup>10</sup> [Q 17](#) (Sunder Katwala)

and non-British Commonwealth citizens with ILR do not need British citizenship in order to stand for Parliament and public office. Laura Devine Immigration, a solicitor firm specialising in immigration, noted that “Voting rights are already partially decoupled from citizenship in some contexts” such as in Scotland, where voting rights for local and Scottish Parliamentary elections extends to “British, Irish and other qualifying foreign nationals aged 16 or over who are lawfully resident, including those with limited [leave to remain] or ILR.”<sup>11</sup> Professor Randall Hansen explained that in the UK immigration and citizenship policy are “hopelessly intertwined” due to historical reasons for migration.<sup>12</sup>

### *Migration levels*

25. The most recent available data from the ONS<sup>13</sup> show that for the year ending (YE) December 2025, net migration was 171,000, down from 331,000 in the YE December 2024, and a peak of 944,000 in the YE March 2023. This is driven largely by decreasing immigration.

**Figure 1: Long term net migration, immigration and emigration in the UK, 2012–2025**



Source: Office for National Statistics, *Long-term international migration, provisional: year ending December 2025*, May 2026 [accessed 21 May 2026]

26. Net migration levels were broadly stable for much of the 2010s, fluctuating mainly between 250,000–350,000. There was a significant drop in migration levels around the COVID-19 pandemic, before a sharp rise in migration after Brexit. This was driven by an increase in non-EU citizens coming to the UK, and largely followed policy liberalisations by the then government. These liberalisations included a post-study work route which made the UK more attractive to international students (July 2021), the opening of humanitarian

11 Written evidence from Laura Devine Immigration (SCI0550); For reference - Irish citizens have the right to vote in local and national elections, as can Commonwealth citizens with limited or indefinite leave to remain. EU citizens can vote in local elections if they resided in the UK before 2021, or if they have ILR, but cannot vote in national elections. In Scotland, anyone who is lawfully resident can vote in Scottish parliamentary elections, and local elections.

12 Q 53 (Professor Randall Hansen)

13 Office for National Statistics, *Long-term international migration, provisional: year ending December 2025*, May 2026

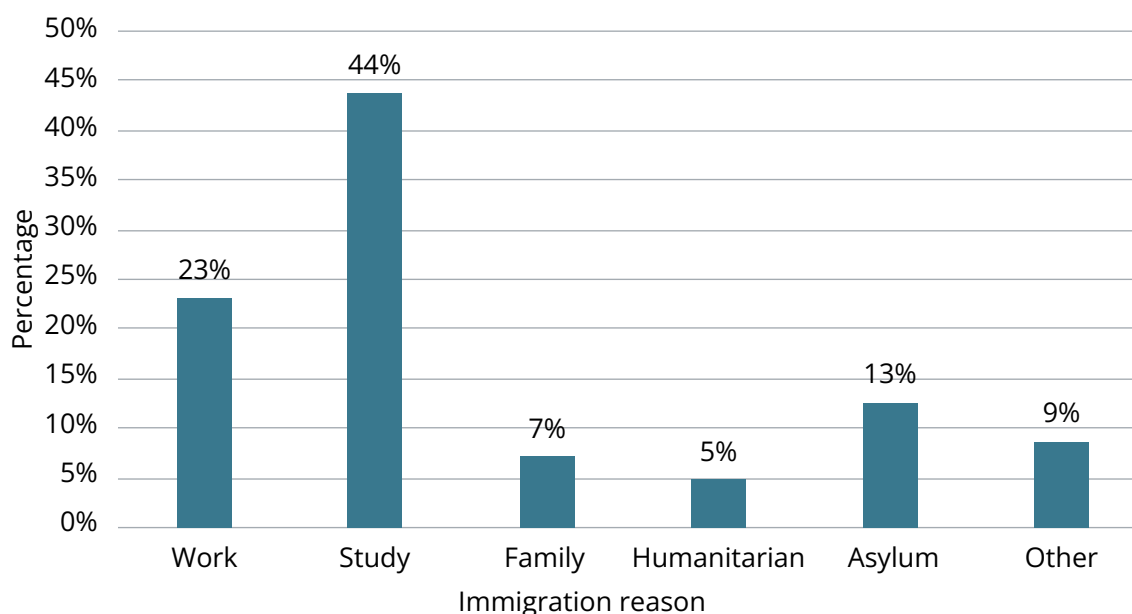
routes for Ukrainians (March 2022) and Hong Kongers (January 2021), and care workers becoming eligible for work visas despite not meeting the RQF3 skill threshold (February 2022). This happened at the same time as UK universities recruited more students from overseas.

27. Net migration fell sharply in 2024 as the then government introduced a suite of policies to reduce immigration, including visa restrictions on family members of care workers and most international students, as well as increased scrutiny of applications to hire migrant care workers, following reports of widespread exploitation in the sector. The current government kept most of these changes and brought in further restrictions in July 2025—most notably, RQF3-5 jobs were removed from the list of jobs eligible for Skilled Worker visas if they were not relevant to the UK’s industrial strategy, and overseas recruitment for care workers was ended (although in-country recruitment is still possible until 2028).<sup>14</sup>

*Why people are coming to the UK—visa routes and types*

28. Immigration statistics released by the Home Office, for the YE December 2025, show that 859,719 people came to the UK in 2025. In 2025, the vast majority of people coming to the UK do so for study (~50%) or work (~30%), while 12% came through humanitarian routes, on small boats, or through other irregular routes.<sup>15</sup> The ONS estimates emigration levels for YE December 2025 were 642,000<sup>16</sup>

**Figure 2: Immigration Route by type**



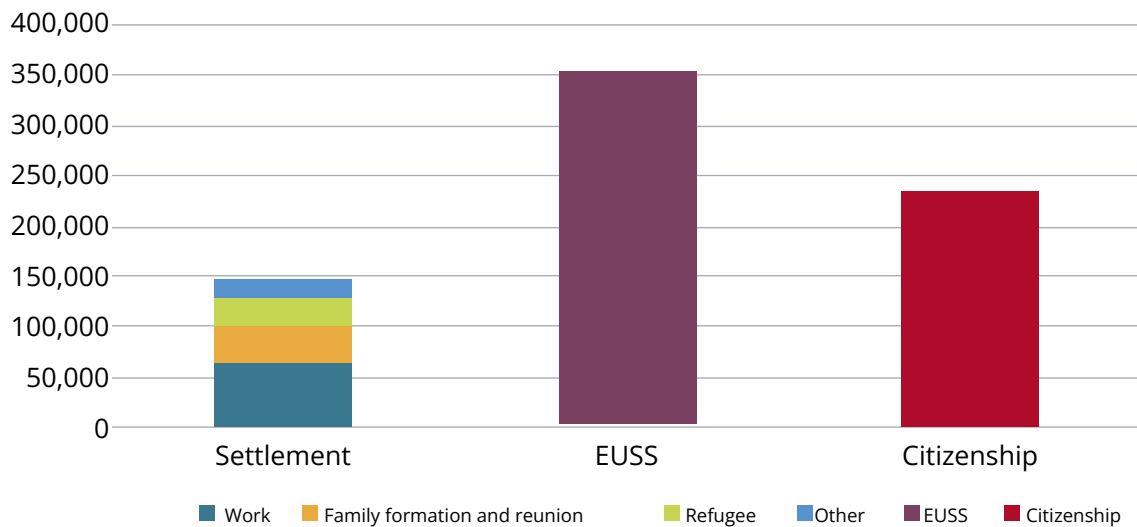
Source: Office for National Statistics, *Long-term international migration, provisional: year ending December 2025*, May 2026 [accessed 21 May 2026].<sup>17</sup>

14 Migration Observatory, University of Oxford, *Net migration to the UK*, May 2026

15 Home Office, *Summary of latest statistics 5. How many people come to the UK via safe and legal (humanitarian) routes?*, February 2026

16 Office for National Statistics, *Long-term international migration, provisional: year ending December 2025*, May 2026. The ONS estimates immigration to the UK in the YE December 2025 to have been around 813,000

17 NB. The graph does not include returning British nationals. In addition, the ONS and Home Office provide different figures for immigration so figures/percentages do not align.

*Settlement levels***Figure 3: New settlement and citizenship granted 2025**

Source: Home Office, *Immigration system statistics data tables*, August 2023 (updated June 2026)

29. In the YE December 2025, 146,405 individuals were granted settlement comprising: 26,832 refugees, 37,351 people through family formation and reunion routes, 63,309 people through work routes, and 18,913 other grants of settlement. In addition, there were 354,647 people who received settlement under the EU Settlement Scheme (EUSS).<sup>18</sup> A further 235,782 people obtained citizenship either through naturalisation or registration.<sup>19,20</sup>
30. The precise number of non-EU citizens with settlement is not known, but the Migration Observatory estimates suggest it was likely to have been between 620,000 and 820,000 at the end of 2024. This does not include people who, after acquiring settlement, became British citizens, nor does it include the approximately 4 million EU citizens who were living and working legally in the UK before January 2021.<sup>21</sup> For reference the Office for National Statistics estimated the UK population was 69.3 million as of June 2024.
31. There are significant differences in settlement rates by the type of visa on which someone comes to the UK. At the end of 2024, at least 77% of family migrants who received an initial family visa between 2005 and 2018 had received a grant of settlement, considerably higher than the settlement rates of study and work migrants over the same period (no higher than 17% and 27% respectively).<sup>22</sup>

18 The EUSS implements the process, agreed between the UK and the EU in the Withdrawal Agreement, by which lawfully resident EU citizens in the UK acquired the right to stay, live and work here post-Brexit. The Government's compliance with the scheme is monitored by the Independent Monitoring Authority.

19 Home Office, *Immigration system statistics data tables*, August 2023 (updated June 2026)

20 Broadly, Naturalisation is the process for adults to apply for British citizenship after meeting residence and eligibility requirements. Registration is primarily for children or individuals with a specific UK connection, such as being born to British parents or having lived in the UK for an extended period.

21 Migration Observatory, University of Oxford, *Migrant Settlement in the UK*, February 2026

22 *Ibid.*

### The current data landscape

32. The Home Office (HO) publishes a range of quarterly statistics relating to entry and initial grants of immigration status—for example, its publications include data on entry visa grants by nationality and visa type, asylum claims by route of entry to the UK, and grants of ILR and citizenship by nationality.<sup>23</sup> These statistics show how many non-UK nationals receive different types of immigration status and how this has changed over time.
33. The picture is less clear with regard to the immigration statuses of non-UK nationals who are living in the UK. The HO’s Migrant Journey (MJ), which is published annually, comes closest. Dr Madeleine Sumption, Director of the Migration Observatory at the University of Oxford, told us that the dataset “effectively tracks over time those who come in on a mainstream visa”, capturing information such as how many “see their visas expire”, or who move visa routes, for example from student visas to work or family visas.<sup>24</sup>
34. While Dr Sumption praised MJ, calling it “one of the high points” of UK immigration data, she observed that “it is less good on non-mainstream journeys through the immigration system”, and would not, for example, capture information on asylum seekers before they were granted refugee status.<sup>25</sup> MJ also captures only non-EU citizens who received their initial visa since 2005 (and EU citizens who arrived since 2021 under the post-Brexit immigration system).<sup>26</sup> This leaves a gap in our understanding of how many non-UK nationals hold each type of immigration status, particularly ILR, British citizenship, and EU Settled Status.
35. A bigger gap in the UK’s immigration statistics that is altogether more concerning surrounds exit checks. Between 2015 and 2020, the Home Office published exit check statistics that linked non-UK nationals’ departure dates from the UK to the expiry dates of their visas.<sup>27</sup> Specifically, the statistics were constructed by linking Home Office visa records to Advanced Passenger Information on outbound travel, collected by airline, ferry, and rail operators.<sup>28</sup> Jon Simmons, former Home Office Chief Statistician told us that exit check publications were stopped in 2020 because of the COVID-19 pandemic and the introduction of the post-Brexit immigration system. He anticipated that their publication would resume at “some point” in 2026.
36. Mr Simmons also told the Committee that the last published statistics showed that “some 95.2% of visa holders [who had not renewed expired visas] could be seen to have departed on time” while a further 0.4% were late departures. He stated that it was not possible to identify whether the remaining 4.4% of people—approximately 85,000 individuals—were still residing in the UK or had departed. He noted that some of these individuals will not have been identified because they left the UK via the Common Travel Area,<sup>29</sup> while in some cases, there would be data matching issues,

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23 Home Office, *Immigration system statistics data tables*, August 2023 (updated June 2026)

24 [Q 113](#) (Dr Madeleine Sumption)

25 *Ibid.*

26 Home Office, *Migrant journey: 2025 report*, May 2026

27 [Q 131](#) (Jon Simmons)

28 Home Office, *Fifth report on statistics relating to exit checks: 2019 to 2020*, August 2020

29 The Common Travel Area (CTA) is an open-border zone between the UK, Ireland, the Isle of Man, and the Channel Islands. It allows British and Irish citizens to travel freely, work, study, and access public services with minimal or no identity checks.

for example naming conventions in India and China, which could “make matching different travel occasions difficult”.<sup>30</sup>

37. Tim Phillips, Director of Home Affairs Value for Money at the National Audit Office (NAO), explained how this data gap affected compliance efforts. He observed that “although the Home Office is able to estimate the number of overstayers, it does not necessarily know where they are or who they are” which meant decisions on compliance action were based on “information that comes to light”.<sup>31</sup>
38. Similarly, Richard Baynham, a senior audit manager at the NAO, told us that the NAO had found several issues with Home Office compliance efforts in a 2025 report which examined how the department had managed the Skilled Worker visa route. The NAO argued that compliance issues were caused by limited data and a lack of cooperation between the Home Office and other government departments and sector regulators. Mr Baynham stated that the Home Office “did not have a sufficient understanding of what happened to people at the end of their visas”.<sup>32</sup>
39. Mr Baynham added that, in response to the report, the Home Office agreed to conduct an evaluation of what happens to Skilled Workers at the end of their visas. However, at the time of writing, the Committee is unaware of this evaluation being published.<sup>33</sup>
40. Mary Gregory, the Executive Director for Population, Census and Social Statistics at the Office for National Statistics (ONS), indicated that she was reasonably confident that the ONS could measure the size of the UK population, despite issues with exit check statistics. She stated that two different approaches to measure the size of the population—one based on rolling forward census data, and another using administrative data—produced similar estimates at the UK level.<sup>34</sup> However, she did state that data on individual outcomes, such as migrants’ work or earnings was poor.<sup>35</sup>
41. Another factor compromising ONS data is the large drop in the percentage of people who respond to the Labour Force Survey (LFS). The LFS response rate was 39% in the final quarter of 2019, but dropped to 24% in the final quarter of 2025.<sup>36</sup> The Migration Observatory stated that “while the survey can still produce some useful statistics, fine-grained analysis on the outcomes of specific migrant groups is much less reliable”.<sup>37</sup> The ONS has acknowledged that “the LFS in its current form is not sustainable,” and is developing the Transformed Labour Force Survey (TLFS) which it says will provide a “long-term solution to falling response rates and quality challenges”. They expect the move to the TLFS to take place either towards the end of 2026 or in 2027.<sup>38</sup>

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30 Supplementary written evidence from Jon Simmons ([SCI0606](#))

31 [Q 131](#) (Tim Phillips)

32 [Q 132](#) (Richard Baynham) and National Audit Office, *Immigration: Skilled Worker visas*, March 2025

33 [Q 132](#) (Richard Baynham)

34 [Q 124](#) (Mary Gregory)

35 [Q 121](#) (Mary Gregory)

36 Office for National Statistics, *Labour Force Survey performance and quality monitoring report: October to December 2025*, February 2026

37 Migration Observatory, University of Oxford, *Top Ten Problems in the Evidence Base for Public Debate and Policy-Making on Immigration in the UK in 2025*, December 2025

38 Office for National Statistics, *Transformed Labour Force Survey TLFS technical design review: April 2025*, April 2025 and Office for National Statistics, Office for National Statistics, *Labour market transformation – update on progress and plans: November 2025*, November 2025

42. Similar data gaps regarding other migrant characteristics were highlighted. For instance, Dr Sumption told us that it was not clear how raising English language requirements to qualify for ILR to the intermediate (B2) level would affect migrants as there was “no baseline to go on” regarding migrants’ current proficiency other than “broad data and self-reported data”.<sup>39</sup>
43. Dr Sumption also told the Committee that there was little data published which broke down migrants’ outcomes and interactions with the state by their immigration status. When discussing criminal justice statistics, she stated “we have no data on immigration status, including whether people are on a visa, whether they arrived without a visa, overstayed, et cetera”.<sup>40</sup>
44. Shaina Sangha, a researcher at the Institute for Government (IfG) think tank, told us that there were also data gaps relating to migrants’ tax contributions and use of public services. She said that “the amount of tax that migrants pay is a guesstimate”. She added that there was evidence that “immigrants underuse healthcare relative to their proportion of the population. It really depends on the service that you are talking about. Basically, it is a very mixed picture.”<sup>41</sup>
45. While there is limited data on migrants’ use of public services, witnesses noted that the Migration Advisory Committee (MAC) had improved the evidence base with regard to migrants’ impact on the public finances, which affects the revenue available to spend on public services.<sup>42</sup> The MAC’s estimates indicate that migrants on different visa routes have vastly different impacts on the public finances over their lifetimes, as discussed in Appendix 6.<sup>43</sup> However, Dr Sumption highlighted that the MAC has estimated the net fiscal impact of only certain migrant groups, and therefore “has not yet covered the entire [immigration] system”.<sup>44</sup> She also stated that data was poor at a local level “partly due to technical issues about sufficient sample sizes in the relevant datasets at the local level, and that is a challenge”.<sup>45</sup>
46. The overall fiscal impact of migration is incredibly difficult to assess, with different modelling systems making different assumptions, and no consensus on the best assumptions to make. The Migration Observatory has collated a number of studies estimating the fiscal impact of migration, with vastly different estimates of the fiscal impact of migration. For example one study put the fiscal impact of European migration for the period 1995–2011 as +£4.4bn, another study had the fiscal impact for the same group over the same time period as -£13.6bn. More recent studies by the Migration Advisory Committee (MAC) have shown wide discrepancies in the expected lifetime fiscal impact of different types of migrant. For example, skilled workers (non-health and social care) main applicants who entered the UK in the 2022/23 financial year were expected to have a lifetime impact per person of +£689,000. Care worker dependants who arrived in the same year were expected to have a lifetime impact per person of -£67,000, with

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39 [Q 116](#) (Dr Madeleine Sumption)

40 [Q 111](#) (Dr Madeleine Sumption)

41 [Q 105](#) (Shaina Sangha)

42 [Q 106](#) (David Goodhart) and [Q 118](#) (Dr Madeleine Sumption)

43 Migration Advisory Committee (MAC), *The Fiscal Impact of Immigration: Static and Dynamic Estimates for the UK*, December 2025, updated March 2026 and Migration Advisory Committee (MAC), *MAC Annual Report December 2025*, December 2025

44 [Q 118](#) (Dr Madeleine Sumption)

45 [Q 109](#) (Dr Madeleine Sumption)

migrant partners of British citizens expected to have an impact of -£109,000 per person.<sup>46</sup>

47. **The Home Office’s migration statistics focus primarily on entry into the UK, whether via a visa or irregularly. While the Migration Journey dataset has some notable gaps in its coverage, it is a valuable resource for understanding how non-UK nationals move through the immigration system over time. However, despite recent improvements (and improvements to come such as the Transformed Labour Force Survey) the evidence base is significantly weaker regarding migrants’ outcomes once in the UK, such as their employment status and use of public services. These gaps make it very challenging to make and analyse policy on migration and settlement.**
48. **The Committee welcomes the introduction of the Transformed Labour survey and hope it will be swiftly implemented.**
49. **We are concerned that exit check data has not been published by the Home Office since 2020. While previous data indicate that most visa holders depart before their leave expires, the Home Office cannot reliably determine the whereabouts of overstayers. As a result, enforcement activity is largely driven by risk and opportunity, rather than data. We deeply regret that the Government stopped publishing exit check data, and welcome the long overdue resumption of exit check statistics later this year.**
50. *The Home Office should resume the publication of exit check statistics as a matter of urgency, and certainly before the 2026 summer recess, with annual updates thereafter. If this has not happened, the Government should provide a statement to Parliament as to why not.*
51. **The most disturbing revelation of this inquiry is that we do not know which or how many migrants are in the UK. For large numbers of visa entrants we have no data to assure us whether they did in fact leave when they were meant to. This is a historical problem of data collection and includes an absence of departure records for migrants who have arrived or been due to leave the UK between 2021 and 2026, and is ongoing. This is simply not good enough and this data failure should be addressed as a matter of urgency.**
52. **As a result of our findings, and despite the presence of high quality data in some areas, it is clear that major data gaps make it difficult for the Government to develop impact assessments, or for scrutiny bodies to assess the likely impact of government proposals.**

## CHAPTER 2: IMPROVING DATA

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53. Chapter 1 examined data gaps, with a particular reference to the lack of exit data and the Government’s lack of knowledge of who is or isn’t in the country. Chapter 1 also highlighted the gaps around the outcomes of those who have migrated to and settled in the UK. This chapter explores ways in which better linkage of data—such as that seen in the Refugee Integration Outcomes (RIO) study—could be adopted across the migration system to better address data gaps.

### Linked administrative data

54. As noted in Chapter 1, several witnesses told us that current migration data were relatively limited with regard to migrants’ characteristics and their outcomes in the UK. However, during our inquiry, several witnesses noted recent positive developments concerning linked administrative data. Mr Simmons explained to the Committee how linked administrative data could work, using refugees as an example:

“We would like a more person-centric system where, when the Home Office grants someone refugee status, we have a little identifier and can track those people onward when they are looked after by local authorities, enter the benefit or housing systems or whatever. We can then marry that data up.”<sup>47</sup>

55. Dr Sumption cited Scandinavian countries as an example of best practice regarding the collection and use of linked administrative data, saying that they are “able to see if someone shows up in the criminal justice system or the health statistics, or if they claim asylum, because the data is all in the same place”<sup>48</sup>
56. The Home Office have, in some areas, developed linked datasets. The Refugee Integration Outcomes (RIO) study linked Home Office and census data to examine the labour market, language, and housing outcomes of resettled refugees and asylum seekers who were granted refugee status between 2015 and 2021. A subsequent RIO study analysis linked Home Office refugee data to HMRC PAYE RTI data and showed the employment rates, working patterns, and earnings of individuals granted refugee status between 2015 and 2023, by the number of years since their grant.<sup>49</sup> Other examples of linked datasets in the UK are below.

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47 [Q 144](#) (Jon Simmons)

48 [Q 114](#) (Madeleine Sumption)

49 [Q 122](#) (Mary Gregory) and [Q 142](#) (Jon Simmons) citing Home Office, Office for National Statistics and Ministry of Housing, Communities & Local Government, *Refugee Integration Outcomes (RIO) Insights: Embarks, Economic Activity, and Housing between 2015 and 2021*, September 2025 and Home Office, *Refugee Integration Outcomes (RIO): Employment from 2015 to 2023*, November 2025

**Box 1: Examples of UK linked administrative datasets**

- HMRC Pay As You Earn (PAYE) Real Time Information (RTI) linked to Home Office visa records. The linked dataset showed the earnings of visa holders on Skilled Worker and family routes—including dependants—in the 2023/24 financial year, with breakdowns by nationality and industry.<sup>50</sup>
- Department for Work and Pensions (DWP) Universal Credit records linked to nationality and immigration status records held in the DWP’s Habitual Residence Test data.<sup>51</sup>

57. Administrative data are often collected for operational purposes—meaning it cannot always be used for statistical publications, even when linked to other sources. However, Mary Gregory told us that “within the ONS, we have a lot more data from administrative sources than we had in the past. There is a huge potential in how we can use that data” regarding research.<sup>52</sup>
58. In contrast to Scandinavian countries, the UK is limited in its ability to link different sources of administrative data. Mr Simmons observed that the UK is “reliant on lots of well-established systems that have been developed by lots of individual departments at different times”.<sup>53</sup> Tim Phillips noted that there were no “unique identifiers” between departments and with local government.<sup>54</sup>
59. Mr Phillips explained to the Committee that “because there is no seamless flow of data”, the state may not identify future demand for public services, which can impede effective service delivery.<sup>55</sup>
60. Mr Simmons told us that this issue “could be avoided if operational IT systems developments considered the broader needs of government” and developed systems to enable “joined up and comprehensive data solutions for users in multiple departments and at a variety of levels (both nationally and locally)” to ensure data on an individual could be seen despite being “held across the wide variety of systems in operation”.<sup>56</sup>
61. When migrants access the labour and housing market, they are required to present an online ‘share code’ generated through the Home Office digital status system. A share code is a time-limited reference that allows an employer or landlord to access a migrant’s immigration status and work or rent, without full immigration documents.<sup>57</sup> Mr Simmons, however, highlighted that migrants are not always asked to identify themselves when they use public services. He noted that if a person accessed A&E “nobody is going to stop and ask for their passport” and stated there was no “way of reliably matching individuals who turn up at A&E, for example, with the immigration record”.<sup>58</sup>

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50 Home Office, *Sponsored Work and Family visa earnings, employment and Income Tax*, May 2025

51 [Q 145](#) (Jon Simmons) citing Department for Work & Pensions, *Universal Credit statistics, 29 April 2013 to 8 January 2026*, February 2026

52 [Q 123](#) (Mary Gregory)

53 [Q 144](#) (Jon Simmons)

54 [Q 143](#) (Tim Phillips)

55 [Q 146](#) (Tim Phillips)

56 Supplementary written evidence from Jon Simmons ([SCI0606](#))

57 UK Visas and Immigration, *eVisas: access and use your online immigration status* [accessed 6 March 2026]

58 [Q 144](#) (Jon Simmons)

62. As noted above, Mary Gregory indicated to the Committee that the ONS is aware of the potential benefits of linked administrative data for their research and analysis. Mr Simmons told us, however, that ONS had stopped working towards a better linked data system “because it would have been extremely expensive and probably not have delivered anything quickly in the short term”.<sup>59</sup>
63. **Linked administrative data can be used to support a greater understanding of outcomes for those who choose to come and live in this country, including how these individuals interact with the labour and housing markets, public services, and the criminal justice system. The Committee welcomes the progress that has been made towards creating a more joined-up data landscape using administrative data. The development of the Refugee Integration Outcomes study provides a clear example of this progress.**
64. **However, old data systems without a consistent individual identifier and gaps in data collection when migrants use public services prevents a comprehensive understanding of their experiences. The absence of linked data and a lack of data sharing across different parts of government also prevents the timely identification of their future demand for services and support, reducing the effectiveness of service planning and delivery.**
65. *The Home Office should take steps to improve, or introduce, two-way data sharing between the Home Office, enforcement agencies, sector regulators and relevant departments, to aid compliance efforts, to provide evidence for future policy development and to assist in impact assessments.*
66. *The Government should seek to emulate a Scandinavian-style data collection system. Visa records should be routinely linked to other administrative data, such as HMRC payroll data and DWP Universal Credit claimant data. To support these linkages, each individual granting of a visa should be assigned an internal individual and consistent identifier, akin to that proposed in the Children’s Wellbeing and Schools Act 2026 which would be included in the records for when these individuals interact with public services, the tax system, and the criminal justice system. All Departments should routinely capture and report this data concerning interaction with these service providers.*
67. **We are disappointed to learn that the ONS has halted its move towards a linked data system due to costs and a focus on short-term outcomes.**
68. *The ONS should resume work towards a more integrated administrative data system, so that migrants’ outcomes in areas such as employment, benefits, housing, health and justice can be analysed more systematically. This would be supported by the introduction of an individual identifier issued alongside the granting of a visa.*

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59 [Q 145](#) (Jon Simmons)

### Interim census

69. Mary Gregory told us that “the census is absolutely a phenomenal tool for understanding who is here and is probably our most accurate measure of the population”.<sup>60</sup> However, the Migration Observatory notes that “Census data can go out of date quickly, particularly when migration levels are high.”<sup>61</sup>
70. The next census is set to be conducted in 2031.<sup>62</sup> Some organisations, including Policy Exchange and the Centre for Policy Studies, have called for an ‘interim census’, in light of high levels of net migration to the UK in recent years and current gaps in population data—particularly at a local level.<sup>63</sup> David Goodhart, head of demography at Policy Exchange, argued that there was a “strong case” for an interim 10% sample census as “services and local authorities get funding from the Treasury partly on the basis of census information”.<sup>64</sup>
71. Alp Mehmet, chairman of Migration Watch, was more sceptical of the value of an interim census, describing it as an “unnecessary cost” noting that the “2021 census cost £900 million”. He also questioned the utility of an interim census, stating: “if we were to put in place a census for 2029 it would be a couple of years before we had any information from it anyway”.<sup>65</sup> Mary Gregory echoed this view, stating that censuses take “years of planning” and that even reaching a 10% sample “is still a massive logistical operation”.<sup>66</sup>
72. Mary Gregory outlined some of the alternatives to an interim census, telling us that “you could obviously consider boosting some existing surveys or doing other things like that that would provide something”.<sup>67</sup>
73. One such alternative could be to increase the sample boost in the Annual Population Survey (APS). However, in addition to the response rate issues with the LFS, discussed above, we note that the ONS has announced a reduction in the APS sample boost in England, which will affect population data analysis at the local and regional levels from September 2026.<sup>68</sup>
74. **The census is a valuable source of data and is hugely important in the allocation of financial resources at a local level. However, conducting an interim census—even with a 10% sample—would be costly, and it is unlikely to be completed within the next year.**
75. *We do not recommend conducting an interim census. Instead, we consider the systematic linkage of Home Office visa data with other administrative datasets to be a more effective long-term solution to data gaps between census years moving forward. The Government has shown it can effectively link data, as evidenced by the RIO dataset. This should be implemented as a priority.*

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60 [Q 126](#) (Mary Gregory)

61 Migration Observatory, University of Oxford, [Top Ten Problems in the Evidence Base for Public Debate and Policy-Making on Immigration in the UK in 2025](#), December 2025

62 [Q 126](#) (Mary Gregory)

63 Policy Exchange, [The case for a 2026 emergency census in England](#), December 2025 and Centre for Policy Studies, [Revised migration data shows extraordinary scale of UK population change](#), November 2025

64 [Q 104](#) (David Goodhart)

65 [Q 105](#) (Alp Mehmet)

66 [Q 126](#) (Mary Gregory)

67 *Ibid.*

68 Office for National Statistics, [Letter from the ONS Permanent Secretary to UK Statistics Authority Interim Chair on ONS prioritisation](#), February 2026

76. **We are concerned that the ONS is set to reduce the size of the Annual Population Survey in September this year, before the Transformed Labour Force Survey becomes fully operational, when there are already sizeable gaps in our understanding of the migrant population in the UK.**
77. *The Annual Population Survey sample should not be reduced until the Transformed Labour Force Survey is fully operational. This would mitigate the risk of further data gaps emerging if there are delays in developing the Transformed Labour Force Survey.*

### CHAPTER 3: EXTENDING THE ROUTE TO SETTLEMENT

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78. The next three chapters explore the Government’s proposals to extend the baseline period of time someone needs to be in the UK before they can apply for indefinite leave to remain from 5 years to 10 years or longer (Chapter 3); to apply this timeline retrospectively to those already on the route to settlement (Chapter 4); and to enable people to ‘earn’ settlement, through reducing the amount of time they have to wait before being able to apply for ILR (Chapter 5) by meeting certain criteria.

#### The Government’s proposals

79. In the November 2025 Fairer Pathway to Settlement consultation, the Government proposed more restrictive settlement rules, which it termed ‘earned settlement’. Under these rules, migrants on qualifying visas would only be eligible for ILR if they meet certain mandatory requirements, such as having no criminal convictions or NHS or tax debt, and specific English language skills. The default waiting time would also be increased from five to 10 years, with a longer baseline waiting time of 15 years for those migrants in the skilled worker route in a role below RQF level 6 (see Glossary for further details), and low-wage migrant workers who arrived on the Health and Care visa. Migrants would wait for longer or shorter periods depending on particular attributes, such as their language ability or income, which are set out in Chapter 5. In addition, dependants (such as family members or partners) would no longer be able to apply for ILR at the same time as the main applicant, and would qualify on their own timescales. Foreign partners and dependants of British citizens retain a 5 year pathway (subject to language and financial requirements) and this is not subject to consultation. The Long Residence rule—allowing those who have been lawfully residing in the UK for 10 years to acquire settlement—would also be abolished. The Government’s intention is to reduce the number of people obtaining settlement in the future, increase the net contribution of the migrant population to the public finances, and encourage migrant integration.<sup>69</sup> These changes, subject to consultation, would be applied retrospectively, so they would apply to anyone currently on the path to settling already in the UK.<sup>70</sup>
80. Broadly, the Government plans to increase the baseline qualifying period for settlement to 10 years, and to 15 years for those on skilled worker visas for jobs that do not require a degree. The Government proposals include options that would reduce the baseline time to settlement (such as earning over £50,250, or speaking English to a C1 level), or increase it (such as arriving in the UK via a small boat, or accessing public funds), In practice, this means that settlement could be obtained in anywhere from 3–30 years.
81. A separate policy paper, *Restoring Order and Control: a statement on the government’s asylum and returns policy*, also published in November 2025, set out further changes to refugee statuses. Refugees would have to renew their status every 2.5 years, with this status being revoked if conditions in their country of origin have changed and the individual no longer warrants protection. Refugees will also have to wait 20 years for settlement, unless they switch to a legal visa route. While in the UK, refugees would not be able

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69 Home Office, *Restoring control over the immigration system*, CP 1326, January 2026

70 Home Office, *A Fairer Pathway to Settlement: statement and accompanying consultation on earned settlement*, CP 1448, November 2025

to access family reunion rights<sup>71</sup> unless they meet new requirements. A new refugee ‘Protection Work and Study’ route was also proposed, which would have a shorter path to settlement.<sup>72</sup> At the time of writing, details on family reunion and the ‘Protection Work and Study’ route are unclear. Many of these changes are expected to be introduced through the Immigration and Asylum Bill.<sup>73</sup>

### *Looking to Denmark*

82. The Home Secretary, Rt Hon Shabana Mahmood MP, has repeatedly stated that Denmark has been an influence on the Government’s approach to migration, particularly asylum.<sup>74</sup> During the inquiry, we received repeated reference to the Danish approach, and to the outcomes of their policies. However, we note that the Danish immigration system differs from the UK’s and comparison should be made with a degree of caution.
83. During the 2000s and 2010s, the Danish government introduced measures to restrict refugees’ access to permanent residence, with mixed impacts on their integration. A 2002 reform that increased refugees’ qualifying time to permanent residence from 3 to 7 years and required them to pass a basic language test had no impact on employment and earnings, but did increase enrolment into education and low-skill refugees. A subsequent reform in 2007, which required refugees to have accumulated at least 2.5 years of full-time employment and to have passed a Danish language test at a higher level, reduced work hours and had no effect on language proficiency.<sup>75</sup>
84. Following this, a series of further policy restrictions on asylum seekers and refugees occurred in the second half of the 2010s. These changes included:
  - Issuing 1–2-year residence permits for refugees so that their need for protection could be reviewed and revoked if their country of origin was later deemed safe.
  - Increasing the standard qualifying period for settlement from five to six years in 2016 and to eight years in 2017. The qualifying period can be reduced, however, if the applicant meets certain thresholds for employment, income, and Danish-language proficiency.
  - Making eligibility for settlement contingent on having been employed for 3.5 years of the last 4 years and not having accessed public benefits in the previous 4 years. Stricter minimum salary thresholds were also introduced.<sup>76</sup>
85. Speaking at an event in London in February 2026, the former Danish Immigration Minister Kaare Dybvad explained that this stricter approach

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71 In the UK, family reunion rights allow recognised refugees (or those with humanitarian protection) to bring their immediate family to join them (spouses, partners, and dependent children aged under 18).

72 Home Office, *Restoring Order and Control: A statement on the government’s asylum and returns policy*, CP 1418, November 2025

73 The Prime Minister’s Office, *King’s Speech 2026: background briefing notes*, 13 May 2026

74 Shabana Mahmood, Home Secretary, *Home Secretary’s speech on immigration: 5 March 2026*, 5 March 2026 and Home Office, *Restoring Order and Control: A statement on the government’s asylum and returns policy*, CP 1418, November 2025

75 Jacob Nielsen Arendt, Christian Dustmann, Hyejin Ku, Oxford Review of Economic Policy, ‘Refugee migration and the labour market: lessons from 40 years of post-arrival policies in Denmark’, Oxford Review of Economic Policy, vol 38, Issue 3, (Autumn 2022), pp 531–556: <https://academic.oup.com/oxrep/article/38/3/531/6701697>

76 House of Commons Library, *Asylum policy in Denmark*, November 2025

to asylum was married with more progressive policies such as an early retirement scheme, and a £400 a month wage increase for care workers, nurses, and prison guards.<sup>77</sup>

86. These more recent policy changes resulted in a large decrease in asylum applications after 2016.<sup>78</sup> However, this was also the case amongst much of Europe<sup>79</sup>, and the Migration Observatory has said that whilst policy changes are likely to have played a role, “it is impossible to disentangle their effect from that of other factors, such as fewer unauthorised arrivals in the EU”.<sup>80</sup> Net migration levels in Denmark have also been broadly stable over the last decade.<sup>81</sup>
87. There has been mixed success as a result of Danish immigration changes. Kaare Dybvad explained that employment rates amongst Danes with a foreign background has increased from 42% in 2015 to 62% in 2025. This is, however, still below the national average of 77%.<sup>82</sup> The imposition of minimum salary thresholds for permanent residence in Denmark saw the proportion of women granted permanent residence reduce significantly. The Central England Law Centre told us “In 2011, before stricter requirements were imposed, 43% of grants of settlement were to women (57% to men). In 2021, after their imposition, only 26.3% were to women (73.7% to men).”<sup>83</sup>
88. In March 2026, the House of Lords Secondary Legislation Scrutiny Committee reported on the latest Immigration Rule Changes. They noted that the evidence base for employment outcomes as a result of asylum changes in Denmark was mixed, and concluded that the Government “has not sought such evidence, in which case we are again concerned that it has not fully thought through the policy, or it has sought such evidence and is not divulging the results of its investigations, which would be contrary to good practice in presenting explanatory material.”<sup>84</sup>
89. We also noted lack of clarity about how the three aims of the Government’s proposals (reducing the number of people obtaining settlement, increasing the net fiscal contribution of migrants, and encouraging integration) may interact.
90. For example, Dr Madeleine Sumption, Director of the Migration Observatory at the University of Oxford and deputy chair of the Migration Advisory Committee (MAC), talked to us about “trade-offs” between the three aims, and suggested that making life harder for those seeking settlement “may reduce their integration”.
91. As the Government has failed to provide an Impact Assessment for their proposals, it is difficult to discern the Government’s view of such potential trade-offs.

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77 Kaare Dybvad, Policy Exchange UK, *How Denmark’s Left got tough on immigration*, 16 February 2026

78 Statistics Denmark, *VAN5M: Asylum applications by citizenship and type of asylum*, [accessed 8 May 2026]

79 Eurostat, *Asylum applicants by type, citizenship, age and sex - annual aggregated data*, May 2026

80 Migration Observatory, University of Oxford, *Temporary protection: the UK’s new policies on asylum and returns*, December 2025

81 Statistics Denmark, *Immigration and emigration* [accessed 8 May 2026]

82 Kaare Dybvad, Policy Exchange UK, *How Denmark’s Left got tough on immigration*, 16 February 2026

83 Written evidence from the Central England Law Centre ([SCI0394](#))

84 Secondary Legislation Scrutiny Committee, *Fifty Sixth Report* (56th Report, Session 2024–26, HL Paper 282)

### Fiscal impact of the proposals

92. The absence of an Impact Assessment also makes it difficult to be clear about the cost-benefit analysis of migration. This is especially so where a category of people seeking settlement may incur a net fiscal cost but have provided benefits by filling vacancies in shortage areas such as the care sector.
93. Even analysing just the fiscal cost of migration—especially given the absence of some data—has proved difficult as we have seen from widely different results from different research studies.
94. The fiscal costs generated by certain migrant groups were highlighted by witnesses. Professor Alan Manning, Professor of Economics at the London School of Economics and former Chair of the Migration Advisory Committee (MAC), told us that the labour market outcomes for refugees, who in many cases will have to wait a minimum of 20 years to acquire ILR, are “not very good [which] ends up costing the taxpayer money over and above the better-publicised money that is paid while they are claiming asylum”.<sup>85</sup>
95. The Committee heard that extending the qualifying time to settlement would likely reduce these fiscal costs, as migrants on temporary visas are required to pay immigration fees and the Immigration Health Surcharge, and they are generally unable to access welfare benefits and housing support.<sup>86</sup>
96. Recent analysis of the fiscal impact of migration produced by the Migration Advisory Committee (MAC) provides an example of the fiscal impact of granting ILR, and therefore entitlement to NHS and welfare support. Taking family migrants who arrived in the 2022/23 financial year as an example, the Migration Advisory Committee (MAC) stated:
- “During their first two decades in the UK, the cohort make an annual positive net fiscal contribution. After they obtain ILR, they become entitled to benefits and no longer pay visa fees or the Immigration Health Surcharge, which reduces this positive contribution.”<sup>87</sup>
97. Dan Hobbs, the Director General for Migration and Borders at the Home Office told us that health and social care workers below RQF6 who came in when skilled worker visa thresholds were lower are likely to represent a fiscal cost.<sup>88</sup> Analysis from the Home Office and the MAC has estimated that 117,000 care workers are expected to settle between 2026 and 2030, representing a lifetime net fiscal cost of £36,000 each, and 79,000 adult dependants of care workers are expected to settle in the same period, representing a lifetime net fiscal cost of £67,000 each.<sup>89</sup>
98. For context, it should be noted that the OBR calculates that the average UK resident, born and raised in the UK becomes a net fiscal cost after the age of 80, as their use of state services (e.g. NHS, pension) starts to outweigh their lifetime tax receipts.<sup>90</sup>

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85 [Q 3](#) (Professor Alan Manning)

86 [Q 97](#) (David Goodhart), [Q 115](#) (Dr Madeleine Sumption)

87 Migration Advisory Committee (MAC), [MAC Annual report December 2025](#), December 2025

88 [Q 155](#) (Dan Hobbs)

89 Home Office, [Estimated lifetime net fiscal costs for care workers and their adult dependants](#), March 2026

90 Office for Budget Responsibility, [Supplementary forecast information release: Migration analysis in September 2024 Fiscal risks and sustainability report](#), March 2025

99. David Goodhart pointed out, however, that the Government could reduce fiscal costs without increasing the time to settlement. Citing the US green card as an example, he told us that individuals could get settlement at “the same five year mark but not automatically get access to the welfare state, social housing, the ability to bring in family members and so on”.<sup>91</sup> He argued this would reduce costs while “giving people confidence” in the settlement system.<sup>92</sup> It could also potentially create an incentive for those with ILR to pursue citizenship, which would allow them to access the full rights of a citizen including recourse to public funds under this proposal.

### A deterrent to migration and asylum seeking

100. Witnesses told us that a 10-year+ path to ILR would be longer than paths in most other high-income countries.<sup>93</sup> Five years was the norm in many cases, but some countries provided even shorter routes. We were told that Australia and New Zealand, for example, offer two- to three-year pathways to permanent residence for skilled migration and partner visa holders, while Canada provides immediate settlement for skilled workers. Witnesses indicated that routes longer than five years were less common, although they are implemented in other high-income countries, such as Denmark (8–10 years), Japan (10 years), and Switzerland (10 years).
101. Zoe Bantleman told us that extending settlement to 20+ years (as could happen for those entering the UK illegally) brings the UK into “very niche company: Andorra, Bhutan, Eritrea, San Marino and Uganda.” She noted that Kuwait has recently approved shortening its route from 20 years to 10 or 15 years.”<sup>94</sup>
102. As well as being outside the contemporary norm, we also heard that proposed changes to length of settlement routes would also be a break from historic norms. Professor Bernard Ryan told us, “The potentially lengthy baseline periods of 10 and 15 years would be markedly out of step with the United Kingdom’s historic approach to work and business categories.”<sup>95</sup>
103. Several witnesses told us that they believed the Government intended for earned settlement to act as a signal to asylum seekers that the UK is a less attractive destination than other countries, which in turn would reduce small boat crossings and asylum claims.<sup>96</sup> Professor Thom Brooks, Professor of Law, Ethics and Government at Durham University, said that the Government were trying to send “a clear message that immigration is controlled” and was being reduced, through the route to settlement being potentially more difficult at 10 years or longer.<sup>97</sup>
104. Some witnesses were sceptical, however, that this signal would effectively reduce pull factors for asylum seekers. Shaina Sangha, of the Institute for Government, told the Committee that “we do not have much detailed knowledge of what motivates asylum seekers to come to the country”.<sup>98</sup>

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91 [Q 102](#) (David Goodhart)

92 *Ibid.*

93 See, for instance, [Q 15](#) (Professor Alan Manning and Sunder Katwala), [Q 24](#) (Zoe Bantleman), and written evidence from The Law Society of England and Wales ([SCI0378](#)).

94 [Q 24](#) (Zoe Bantleman)

95 Written evidence from Professor Bernard Ryan ([SCI0599](#))

96 [Q 5](#) (Sunder Katwala), [Q 80](#) (Professor Thom Brooks), [Q 90](#) (Shaina Sangha)

97 [Q 80](#) (Professor Thom Brooks)

98 [Q 90](#) (Shaina Sangha); see also [Q 26](#) (Barry O’Leary).

Sunder Katwala observed that previous measures to reduce pull factors had not been effective. He told us that the previous Government’s decision not to hear asylum claims at all “did not affect pull factors.”<sup>99</sup> He went on to say that “there is relatively little evidence that people know about [UK immigration rules and provisions]”<sup>100</sup> indicating that the changes would be unlikely to affect why people choose to come to the UK.

105. **A baseline 10-year path to ILR for migrants with work and family visas would be more restrictive than equivalent routes in comparable high-income countries. Paths exceeding 10 years are far less common and would make the UK an outlier.**

### Impact on integration

106. Many witnesses were concerned that increasing the length of time for ILR to 10 years or beyond would undermine migrant integration by reducing the security of their immigration status.<sup>101</sup> Professor Ricky van Oers, Professor of Immigrant Inclusion and Law at the Western Norway University of Applied Sciences, told the Committee that “it is clear from research that having secure residence and being protected from expulsion is a huge driver for integration—it is a crucial factor because, without that, people will not be able to build their lives.”<sup>102</sup>
107. Academics Dr Linda Morrice et al highlighted that the Home Office’s 2019 Indicators of Integration<sup>103</sup> identified safety and stability as key facilitators of integration,<sup>104</sup> a point echoed by Talent Beyond Boundaries, an organisation that matches skilled refugees with employers, which stated that a “predictable transition” to citizenship enables people to “make long term housing and employment decisions”.<sup>105</sup>
108. Individuals who submitted evidence raised similar concerns, telling us that longer routes to ILR made it more difficult to make decisions relating to family planning, buying a house or car, and education—whether for themselves or for children.<sup>106</sup>
109. Bindmans LLP told us that longer settlement times meant “employers will face additional costs in employing overseas workers<sup>107</sup> and uncertainty in workforce planning ... leading to a shrinking pool of overseas talent”.<sup>108</sup> Andromeda-Sim, a UK-based aviation simulation technology company, said that uncertainty regarding migrant settlement would reduce its ability to forecast recruitment and training needs, invest in innovation and R&D, and plan long-term commercial strategies. It also highlighted that “replacing

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99 [Q 3](#) (Sunder Katwala). The Illegal Migration Act 2023 prevented people who arrived in the UK without authorisation on or after 7 March 2023 from being granted protection. In practice, this prevented applications submitted after this date from being processed. In July 2024, the new Home Secretary Rt Hon Yvette Cooper MP issued a statutory instrument that disapplied this provision, thereby restarting the processing of applications.

100 [Q 3](#) (Sunder Katwala)

101 For instance, [Q 68](#) (Professor Ricky van Oers) and written evidence from the Refugee Council ([SCI0400](#)) and Praxis and the Runnymede Trust ([SCI0474](#)).

102 [Q 68](#) (Professor Ricky van Oers)

103 Home Office, *Home Office Indicators of Integration framework 2019 third edition*, May 2022

104 Written evidence from Professor Linda Morrice, Professor Jenny Phillimore and Dr Alison Strang ([SCI0371](#))

105 Written evidence from Talent Beyond Boundaries ([SCI0502](#))

106 See Appendix 5.

107 Through paying sponsorship fees across a greater number of years.

108 Written evidence from Bindmans LLP ([SCI0348](#))

a senior engineer costs approximately £25,000–£30,000 in recruitment, sponsorship, training and project interruption”, costs that smaller employers would find more difficult to absorb.<sup>109</sup>

110. Evidence submitted to the Committee highlighted a trade-off in extending routes to ILR beyond 10 years for refugees—this would enable the Government to return refugees to their country of origin if it was deemed safe but could adversely impact integration outcomes. Sunder Katwala told us that the proposals could mean refugees are returned to their origin countries “5 years or even 18 years” after they arrive in the UK, and that this “obviously puts question marks over your integration and settlement”.<sup>110</sup> Dan Hobbs, Director General of the Migration and Borders Group at the Home Office highlighted that the 30 month checks would only apply to refugees on ‘core protection’ routes: “The Government plan to open up study and work pathways for refugees in-country. It is the intention that those people move on to those pathways, where they are highly likely to contribute more and have better integration outcomes.”<sup>111</sup>
111. **Extending the qualifying time to ILR risks undermining integration by reducing affected migrants’ security of status—this would limit their ability to make long-term employment, family, and housing decisions. In addition, the high cost of immigration application fees and the Immigration Health Surcharge for migrants risks increasing poverty among low-income migrants. In some cases, those who are unable to afford to renew their status may fall out of legal status, increasing the size of the unauthorised migrant population if they do not depart the UK.**
112. **The Government’s proposal of a 20-year settlement route for refugees with reviews of their refugee status every 2.5 years risks compromising integration and undermines opportunities for refugees to make long term decisions regarding work, family or other aspects of life.**
113. *We do not support the Government’s proposals to extend the baseline qualifying time for Indefinite Leave to Remain to 10 years, to 15 years for those on work visas below RQF 6, and to 20 years for refugees on the core protection route. The Government should instead explore the option of retaining the 5 year baseline qualifying time for Indefinite Leave to Remain, while separating Indefinite Leave to Remain from access to public funds. Migrants with ILR could remain subject to the No Recourse to Public Funds condition until they have resided in the UK for 10 years and/or obtained British citizenship.*

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109 Written evidence from Andromeda-Sim Ltd ([SCI0070](#))

110 [Q 10](#) (Sunder Katwala)

111 [Q 163](#) (Dan Hobbs)

## CHAPTER 4: RETROSPECTIVE APPLICATION OF THE NEW IMMIGRATION RULES

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114. In her foreword to the earned settlement Immigration White Paper, the Home Secretary said that:

“We propose to apply these changes to everyone in the country today who has not already received indefinite leave to remain. This would mean that those who are due to reach settlement in the coming months and years would be subject to the new requirements for earned settlement, as soon as our immigration rules have changed.”<sup>112</sup>

115. This is subject to final decision following the consultation, which invited views on whether there should be ‘transitional arrangements’ to exempt some people already in the UK.<sup>113</sup>

116. The Migration Observatory at the University of Oxford has said that “a precise estimate of how many people would be affected by the proposed changes is not possible”, but its analysis of Home Office visa data showed that “around 2.2 million people—53% of all those on temporary visas at the end of 2024—held temporary visas that currently have a 5-year path to settlement”.<sup>114</sup> It indicated that the mandatory requirement to have an income of £12,570 for three to five years would affect the largest number of people, with effects concentrated among groups with lower employment rates, including dependants of people holding worker visas including health and care visas,<sup>115</sup> people holding family visas,<sup>116</sup> refugees,<sup>117</sup> and BN(O)s from Hong Kong.<sup>118</sup>

### Rationale for the decision

117. Dr Madeleine Sumption stated that the Government’s rationale for retrospective action is “effectively that it was a mistake to offer the current set of policies, particularly to people who came in 2022 and 2023”.<sup>119</sup> Echoing more general arguments for the extension of the route to ILR to 10 years, Barry O’Leary, Partner at Wesley Gryk Solicitors LLP told the Committee that “the Government’s point would be, ‘If they get permanent residence, they may all leave their jobs and go on to benefits’”.<sup>120</sup> This is explored further in Chapter 3

118. The Minister for Migration and Citizenship gave a clear answer for applying rules retrospectively. He told us:

“Because the levels of migration we have seen over the last five to six years, and the fact that many of those people are due to settle soon, would put untold stresses on our welfare system and social housing, for

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112 Home Office, *A Fairer Pathway to Settlement: statement and accompanying consultation on earned settlement*, CP 1448, November 2025

113 House of Commons Library, *Changes to UK visa and settlement rules after the 2025 immigration white paper*, June 2026

114 Migration Observatory, University of Oxford, *Changes to settlement: what do they mean?*, February 2026

115 Home Office, *Sponsored Work and Family visa earnings, employment and Income Tax*, May 2025

116 Migration Advisory Committee (MAC), *MAC Annual report: December 2025*, December 2025

117 Home Office, *How many refugees are in employment?*, November 2025

118 UK Data Service Data Impact Blog, *BN(O) Migrants Panel Survey*, July 2025

119 [Q 115](#) (Dr Madeleine Sumption)

120 [Q 23](#) (Barry O’Leary); See also [Q 102](#) Goodhart

example. By making it retrospective, we are taking that pressure off the already buckling system”.<sup>121</sup>

### Concerns with this approach

119. A significant concern expressed in many submissions to the Committee was that retrospective action was unfair, as individuals currently on routes to settlement had made long-term decisions with the expectation that they would be able to acquire ILR after five years.<sup>122</sup> Individuals who submitted written evidence told us that they had left family, quit jobs, sold their homes, taken out loans and postponed growing their families to come to the UK.<sup>123</sup>
120. Many individuals who submitted evidence to the Committee stated that they could not have planned for the proposed reforms and cannot make changes prior to implementation to meet new requirements. The Greater Manchester Immigration Aid Unit, a not-for-profit provider of specialist legal immigration advice, echoed this view. It said that the proposed extension of ILR pathways for migrants whose ‘No Recourse to Public Funds’ had been lifted in order to claim welfare benefits was “deeply unfair” as there had previously been “no indication that this would ever impact on their future immigration status”.<sup>124</sup>
121. Other witnesses highlighted that Hong Kong citizens with British National (Overseas) visas had migrated to the UK on a presumed 5 year route based on statements made by the Government at the time the route was opened.<sup>125</sup> When the BN(O) route was announced in 2020, for example, the then Home Secretary, the Rt Hon. Dame Priti Patel MP, said in her foreword:
- “My offer to BN(O) citizens is a very generous one. I am not imposing skills tests or minimum income requirements, economic needs tests or caps on numbers. I am giving them the opportunity to acquire full British citizenship. They do not need to have a job before coming to the UK—they can look for work once here. They may bring their immediate dependants, including non-BN(O) citizens.”<sup>126</sup>
122. However, the Government’s proposals would mean people on BN(O) visas would have to meet language and employment requirements, though they would retain the five-year route to settlement.
123. We were told that Hong Kong’s Mandatory Provident Fund (MPF) Schemes Authority, a private retirement fund, was withholding mandatory contributions from Hong Kongers by not accepting BN(O) passports as a valid proof of identity.<sup>127</sup> Individuals who submitted evidence were concerned that extending routes to ILR would delay BN(O)s from accessing these funds using a British passport. According to Reading Hongkongers CIC, £3.25 billion of Hong Konger savings were being withheld.<sup>128</sup>
124. Another concern raised by witnesses was that retrospective action could affect the UK’s attractiveness, particularly among higher-skilled migrants, because of uncertainty about what may happen in the future. Shaina Sangha

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121 [Q 153](#) (Mike Tapp MP)

122 For instance, written evidence from UNISON ([SCI0407](#)) and Andromeda-Sim Ltd ([SCI0070](#)).

123 See Appendix 5.

124 Written evidence from Greater Manchester Immigration Aid Unit ([SCI0487](#))

125 Written evidence from Mr Sheung-Kwun and Ms Leung ([SCI0258](#))

126 Home Office, *Hong Kong British National (Overseas) Visa policy statement*, July 2020

127 Lewis Silkin, *BN(O) Passports will no longer be accepted by the MPFA*, March 2021

128 Written evidence from Reading Hongkongers CIC ([SCI0404](#))

said that retrospectively applying the changes “is probably especially harmful for prospective migrants of a sort of higher quality—the type you might want to see more of in the UK” who would have better access to information and “might well be put off” by retrospective action.<sup>129</sup> Dr Sumption similarly told us that “the UK might be seen as an unreliable place to be a migrant, and in the future that could have a knock-on effect on attracting people who the UK wants to attract”.<sup>130</sup>

125. Analysis by the Migration Advisory Committee (MAC), discussed in more detail in Appendix 6, indicates that discouraging higher earning migrants would adversely affect the fiscal impact of migration. In its analysis of migrant workers’ lifetime impact on the UK’s public finances, it estimated that “within the highly positive Skilled Worker (excluding Health and Care) main applicants, 72% of the fiscal gain comes from the top 30% of earners”.<sup>131</sup>
126. In addition, many witnesses questioned the legality of applying these rules retrospectively. Barry O’Leary, partner at Wesley Gryk solicitors, told us “there might be a legal challenge to changing the rules while people are on the route.”<sup>132</sup> The Skilled Worker Justice Alliance drew our attention to the 2008 HSMP Forum case, saying the legal framework in that judgement “illustrates the public law sensitivity of altering the settlement consequences attached to an already-admitted cohort.”<sup>133</sup> A number of those on the pathway to settlement also cited the HSMP Forum case.<sup>134</sup>
127. As stated by the House of Lords Constitution Committee, the rule of law requires that laws should be prospective, rather than retrospective. “It should apply only to later behaviour and situations and not to those which predate it.”<sup>135</sup>
128. The Minister for Migration and Citizenship, Mike Tapp MP, told us that the Home Office was receiving legal advice and was satisfied that proposed retrospective action was legal, with impact assessments to be published “in due course”.<sup>136</sup>
129. **Any retrospective change would be manifestly unfair—and may be unlawful—towards migrants, who have planned their lives around the current system and made significant long-term decisions, such as career, housing, and family life decisions with the expectation that they would be able to qualify for ILR under the current rules. This is egregious in the case of migrants on the Hong Kong BN(O) visa route, given that previous Government statements had assured BN(O)s that they would have a route to British citizenship without any such requirements.**

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129 [Q 102](#) (Shaina Sangha).

130 [Q115](#) (Madeleine Sumption)

131 Migration Advisory Committee (MAC), *The Fiscal Impact of Immigration: Static and Dynamic Estimates for the UK*, December 2025 (updated March 2026)

132 [Q 29](#) (Barry O’Leary)

133 Written evidence from the Skilled Worker Justice Alliance ([SCI0610](#))

134 See Appendix 5.

135 Select Committee on the Constitution, *The rule of law: holding the line against tyranny and anarchy* (13th Report, 2024–26, HL Paper 211)

136 [Q 153](#) (Mike Tapp MP)

130. **The UK's reputation would be adversely impacted by retrospective action, which will likely make the UK a less attractive destination for highly skilled migrants in the future.**
131. *Any changes to ILR rules should not apply retrospectively to individuals who are already on a qualifying route. While the Government may not support the previous Government's decision to open certain visa routes, that decision has already been made. Many migrants made significant long-term decisions with the expectation of acquiring ILR after five years.*

## CHAPTER 5: EARNING SETTLEMENT AND CITIZENSHIP, AND PROMOTING INTEGRATION

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132. In its earned settlement Immigration White Paper, the Government proposed extending the current five-year route to settlement to 10 years (15 years for workers at RQF 3–5) but with potential reductions or additions to that length of time, depending on the individual’s attributes, through an earned settlement scheme. The Government states that earned settlement is intended to ensure that migrants settling in the UK are of good character, reward migrants’ contributions to the UK, and recognise continuous residence. It is also intended to “ensure applicants demonstrate meaningful engagement with British Society”, with integration as one of the “four core pillars” of the design of earned settlement.<sup>137</sup> This chapter explores the concept of earned settlement, whether it will effectively drive integration, and the opportunities for a more strategic approach to promoting integration.

### Proposed model for earned settlement

133. The Government is proposing that people who meet specific criteria, such as higher incomes or advanced proficiency in English, would qualify for reductions, as would applicants who work in the community—such as by volunteering—or who hold a family visa or a Hong Kong BN(O) visa. The maximum reduction being consulted on is seven years.<sup>138</sup> Earned settlement also has a punitive aspect, as the Government is also consulting on how the path to ILR may be extended. Applicants who received public funds would have longer waiting periods (an additional 5 years if public funds are accessed for less than 12 months, an additional 10 years if public funds are accessed for more than 12 months), as would applicants who entered the UK through irregular routes, first arrived on a visitor visa, or had overstayed a visa for more than six months. The maximum extension being consulted on is 20 years in addition to the normal 10-year settlement timeline.
134. Only the largest addition and reduction would apply under the proposals in the earned settlement Immigration White Paper—reductions or additions would not stack, meaning for example that migrants could not have both a reduction of 7 years because of their income and a further 1 year because of language skills. Alongside this, additions will “take precedence” over reductions<sup>139</sup>—though it is not clear how this would work in practice.
135. As noted in Chapter 3, longer routes to settlement may be associated with higher costs for migrants, potentially pushing some into deprivation or homelessness, and may create barriers to integration.
136. **The Committee acknowledges that to a certain extent, settlement and citizenship have always been earned, in the case of the UK through current language, financial, and conduct requirements. Our concern is not with the concept of earning settlement—indeed this is a sensible and internationally implemented approach—but rather with the details of the Government’s proposals.**

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137 Home Office, *A Fairer Pathway to Settlement: statement and accompanying consultation on earned settlement*, [CP 1448](#), November 2025

138 Home Office, *Restoring control over the immigration system*, [CP 1326](#), January 2026

139 Home Office, *A Fairer Pathway to Settlement: statement and accompanying consultation on earned settlement*, [CP 1448](#), November 2025

137. **Eligibility for ILR should still (with appropriate exemptions) be dependent on meeting minimum requirements such as no criminal convictions, certain financial criteria, and English language proficiency.**
138. *The Government is exploring ways to combine reductions and additions to the settlement qualifying period. They should clarify how additions and reductions can be combined and what additions ‘taking precedence’ means. Combining additions and reductions should be done in a way that means people who are subject to additions are still incentivised to pursue desirable outcomes such as higher paid employment or greater language skills.*
139. Eligibility for reductions would be contingent on meeting mandatory minimum requirements, regardless of the length of time an individual has held a valid visa with a route to ILR. Applicants would need to have intermediate proficiency in English (at B2 level, equivalent to A Level), an income of at least £12,570 (the current threshold for paying income tax and National Insurance) for three to five years, no criminal convictions or government debt, and have passed the Life in the UK test. The earned settlement proposals include that individuals employed in specified public service occupations (such as health and education occupations) would qualify for a five-year reduction to their qualifying time if their role requires graduate-level skills (RQF level 6 or above) and is paid according to national pay scales, meaning that the five year reduction can be achieved even if the income “may not meet the proposed threshold for an income-based reduction in the qualifying period.”<sup>140</sup>
140. The full details of the minimum requirements and adjustments to the baseline qualifying period can be found in the below table:

**Table 2: Earned settlement proposals**

<b>Minimum requirements</b>	
The applicant must not have a criminal conviction, any current litigation, NHS, tax or other government debt.	
The applicant must have competency in English at the B2 level (intermediate) and have passed the Life in the UK test.	
The applicant must have had an annual income above £12,570 for a minimum of 3 to 5 years (subject to consultation).	
<b>Additions/reductions to the baseline qualifying period</b>	
<b>Attribute</b>	<b>Impact on ILR</b>
Applicant has competency in English language at C1 Level under the Common European Framework of Reference for Languages	Minus 1 year

<sup>140</sup> Home Office, *A Fairer Pathway to Settlement: statement and accompanying consultation on earned settlement*, November 2025

Applicant has earned a taxable income of £125,140 for 3 years immediately prior to applying for settlement	Minus 7 years
Applicant has earned a taxable income of £50,270 for 3 years immediately prior to applying for settlement	Minus 5 years
Applicant has been employed in a specified public service occupation for 5 years (at RQF6+)	Minus 5 years
Applicant has worked in the community (volunteering etc)	Minus 3–5 years
Applicant holds a permission as the parent/partner/child of a British citizen and meets core family requirements (Not subject to consultation)	Minus 5 years (Not subject to consultation)
Applicant holds a permission granted under the British National Overseas route (Not subject to consultation)	Minus 5 years (Not subject to consultation)
Applicant has 3 years continuous residence as the holder of a permission as a Global Talent worker or Innovator Founder	Minus 7 years
Acknowledgement of specific and vulnerable groups having a reduction	Subject to consultation
Applicant has been in receipt of public funds for less than 12 months during route to settlement	Plus 5 years
Applicant has been in receipt of public funds for more than 12 months during route to settlement	Plus 10 years
Applicant arrived in the UK illegally e.g. via small boat/ clandestine	Plus up to 20 years
Applicant entered the UK on a visit visa	Plus up to 20 years
Applicant has overstayed a permission for 6 months or more	Plus up to 20 years
Only the largest addition and/or reduction applies to the baseline qualifying period. This table simplifies the proposed rules	

Source: Home Office, *A Fairer Pathway to Settlement: statement and accompanying consultation on earned settlement*, November 2025

141. **We do not understand the inclusion of ‘no current litigation’ in the minimum requirements, and seek clarification of what this means in this context.**

142. ***The Government should clarify what it means by ‘no current litigation’ before applying it as a minimum requirement.***

### Social cohesion strategy

143. On 9th March 2026, after we had taken the vast majority of our evidence, the Ministry for Housing, Communities, and Local Government released *Protecting What Matters: Towards a more confident, cohesive, and resilient United Kingdom*.<sup>141</sup> This ‘Social Cohesion Strategy’ covers amongst other things, integration. As acknowledged in the strategy, localised integration policy responsibility is often devolved to Scotland, Wales and Northern Ireland. However, there are some areas, relating to the immigration system, which are reserved matters. The Government has set out how they will address these issues:

- “Set clear national integration expectations for communities across the country, focused on stronger social connections, shared identity, English language proficiency, and participation in work.”
- “Develop an effective cross-government integration strategy”.
- “Review English language provision to identify best practice, and explore how innovation, including digital delivery, can increase the numbers able to speak English, with conclusions published in Autumn 2026.”
- “Set clearer expectations for how new arrivals and migrants integrate into society. This includes introducing an ‘Earned Settlement’ system.”
- “Refresh the content of the Life in the UK test.”
- “Support communities who are underrepresented in the workplace. Everyone should be able to access the labour market.”<sup>142</sup>

144. **Notwithstanding some reservations, such as the apparent absence of urgency for the publication of an integration strategy, the Committee broadly welcomes the publication of *Protecting What Matters*.**

### Work and integration

145. The qualifying time for applying for ILR may be reduced through employment outcomes. Multiple witnesses highlighted the importance of work on integration outcomes. Professor Christian Joppke told the Committee that the most important factor was “work, work, work”<sup>143</sup>. Professor Randall Hansen argued that the questions we should be asking are “whether people are employed. Are they paying their taxes? Are they making a contribution and, of course, are they respecting the law? That is the most important thing; it is far more important than segregation or cultural integration” and used the phrase “immigration works where immigrants work”.<sup>144</sup>
146. Migrant labour has formed an increasingly large part of the UK workforce, with Migration Observatory data indicating that “19% of UK employees in

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141 Ministry of Housing, Communities & Local Government, *Protecting What Matters: Towards a more confident, cohesive, and resilient United Kingdom*, [CP 1540](#), March 2026

142 *Ibid.*

143 [Q 65](#) (Professor Christian Joppke)

144 [Q 58](#) (Professor Randall Hansen)

December 2024 were non-UK nationals at the time they registered for a national insurance number” and that this figure has “almost doubled in the last decade”.<sup>145</sup>

*Risk of exclusion*

147. However, linking access to earlier settlement to work risks excluding particular groups. The Annual Population Survey shows that migrant women are less likely to be employed than migrant men. As Bindmans LLP noted, women are more likely to take career breaks, engage in part-time work, and have childcare needs.<sup>146</sup> Professor Randall Hansen noted that this was not a uniquely British problem: “For foreign women, the issue is lower levels of employment, which again is true in all European countries.”<sup>147</sup>
148. The Committee also heard that the issue is particularly acute for refugees. Professor Aan Manning said that “the labour market outcomes of refugees are not very good, this ends up costing the taxpayer money over and above the better-publicised money that is paid while they are claiming asylum”.<sup>148</sup> Previously, new refugees had 28 days before their existing government support was terminated. Dr Sarah M Hughes noted this meant refugees had only 28 days to source accommodation, work, or Universal Credit, and argued that this “impossibly short timeframe actively undermines integration, exposing an already-vulnerable population to homelessness, labour exploitation, and financial destitution.”<sup>149</sup>
149. In December 2024, the Government launched a pilot of a 56 day move-on period. The Refugee Council stated the longer move on period “made a big difference” to refugees’ ability to move off Home Office support, making it more likely that they found accommodation and could access benefits. However, they noted issues remained, including the Home Office not providing “vital documentation” in appropriate timeframes. In March 2026, government support for refugees was extended to 42 days. In response to this, the Refugee Council called for the move on period to be extended to 56 days, to align with existing housing and welfare legislation.<sup>150</sup> On 10 June 2026, the Government published an evaluation of the pilot.<sup>151</sup>
150. **We welcome the Government’s actions extending the move-on period from 28 to 42 days, and believe this will better support refugees in obtaining work and integrating into communities. We note the evaluation published on 10 June.**
151. Data released by the Home Office on refugee employment outcomes show that 24% of refugees aged 16 to 64 years who were granted refugee status

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145 Written evidence from Cambridge University Press & Assessment ([SCI0355](#))

146 Written evidence from Bindmans LLP ([SCI0348](#))

147 [Q 58](#) (Professor Randall Hansen)

148 [Q 3](#) (Professor Alan Manning)

149 Written evidence from Dr Sarah M Hughes ([SCI0353](#)); On a separate but related note, those seeking asylum but awaiting a decision are not usually allowed to work pending a decision. They are instead provided with accommodation and support to meet their essential living needs if they would otherwise be destitute. See UK Visas and Immigration, *Permission to work and volunteering for asylum seekers*, March 2026 for further details.

150 Refugee Council, *Getting it Right: The Importance of the Move-On Period for Newly Recognised Refugees*, March 2026

151 Home Office, *Evaluation of the initiatives to enhance the move on process*, June 2026. This evaluation was published after the report was agreed and as such the Committee was unable to consider the evaluation’s findings.

between 2015 and 2023 found employment in the first year since they were granted refugee status. The rate of employment reached around 45% after two years and then increased more slowly to 48% for those who had refugee status for eight years.<sup>152</sup> In comparison, the UK employment rate for those aged 16 to 64 years was 78% for UK born men, and 73% for UK born women.<sup>153</sup> Among regular migrants, 82% of those born in the EU (85% of men and 80% of women) and 74% of those born in non-EU countries (82% of men and 66% of women) were in employment in 2024.<sup>154</sup>

152. The Refugee Council told us that in recent years, the UK Government funded a number of different programmes to support refugees to find work. The Refugee Transitions Outcomes Fund (RTOF) and the Refugees Employability Programme (REP) were both started by the previous Government, and evaluations of both schemes have noted their positive impact on employment outcomes. However, RTOF finished in March 2024, and REP ended in June 2025—and neither of them were replaced.<sup>155</sup>

### *Labour exploitation*

153. Migrants and refugees may face labour exploitation due to issues in the immigration system. In July 2025, the Public Accounts Committee stated that because the Skilled Worker visa system makes a migrant’s right to remain in the UK dependent on the employer, it “makes migrant workers vulnerable to exploitation”; described the Home Office’s work to tackle the exploitation of migrants workers as “slow and ineffective”; and stated that they were “not convinced by the Home Office’s approach to meeting its responsibility for preventing modern slavery”.<sup>156</sup>
154. Exploitation relating to the social care system and Health and Care visas were noted. Between July 2022 and December 2024, the Government revoked over 470 sponsor licenses held by care providers, due to concerns regarding exploitation. Over 39,000 workers had been associated with these sponsors since October 2020.<sup>157</sup>
155. In response to this risk, UNISON called for reforms including “decoupling visa sponsorship from individual employers in favour of sector-wide schemes ... removing employer power to threaten deportation”.<sup>158</sup>

### *Volunteering*

156. While witnesses pointed to English language proficiency and work as key drivers of migrant integration, the Committee received less evidence stating that volunteering would improve integration. One potential positive impact of voluntary work on integration is its effect on community cohesion. Migration Yorkshire indicated that community cohesion improves when migrants and the UK-born have more interactions, highlighting research that found “people with positive views about migration are those with

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152 Home Office, *How many refugees are in employment?*, November 2025

153 *Ibid.*

154 Migration Observatory, University of Oxford, *Migrants in the UK labour market: an overview*, May 2026

155 Written evidence from the Refugee Council (SCI0400)

156 Committee of Public Accounts, *Immigration: Skilled worker visas*, (37th Report, Session 2024–25, HC 819) p 5; see also Written evidence from the Work Rights Centre (SCI0413)

157 Home Office and Department of Health and Social Care, UK Visas and Immigration, *New rules to prioritise recruiting care workers in England*, March 2025

158 Written evidence from UNISON (SCI0407)

regular contact with migrants in their local area”.<sup>159</sup> Speaking on the concept of earned settlement, Daniel May told us that many individuals he had met had already ‘earned’ settlement through continuous contributions, including amongst other things by volunteering.<sup>160</sup>

157. The Home Office’s 2019 Indicators of Integration framework indicates that while voluntary work can support aspects of integration directly—for example, by building social connections—its primary contribution is indirect, particularly through the other criteria which earn a reduction in routes to ILR, such as practising language, gaining work experience, and building social connections.<sup>161</sup>
158. A number of witnesses were however sceptical about the volunteering reduction. David Goodhart felt that volunteering would be “too easy to game”<sup>162</sup> Reunite Families UK told us that “volunteering, by definition, is the act of freely giving one’s time, without pay, for the benefit of others, the community, or the environment.” They felt that “making volunteering compulsory undermines its core purpose and risks creating a group of people forced to work for free under the threat of having their lives in the UK taken away from them.”<sup>163</sup> Other submissions highlighted the difficulty that those working long hours or with caring responsibilities would face in finding time to volunteer.<sup>164</sup>
159. **Work is a crucial enabler of integration. The Committee agrees wholeheartedly that “immigration works where immigrants work” and welcomes the Government’s focus on work as part of earned citizenship. However, such an approach risks excluding some groups, and may have a disproportionate impact on women and refugees.**
160. **Employment outcomes for refugees are woeful, and women still see poorer work outcomes than men. This represents both a missed opportunity to benefit from their potential, and a huge burden on the state. Investing in employment training and opportunities for refugees and women early on will save the Government money in the long run through increased tax receipts and reduced welfare spending.**
161. *The Government should reintroduce employment schemes specifically targeting refugees, such as the Refugee Transitions Outcomes Fund (RTOF) and the Refugees Employability Programme (REP). Alongside this, the Government should explore how to improve employment support for migrant women, drawing on best practice from other targeted schemes.*
162. **The phrase immigration works where immigrant works goes both ways. While the Government must support migrants and refugees to access opportunities to work, migrants must take them.**

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159 Written evidence from Migration Yorkshire ([SCI0497](#))

160 Written evidence from Daniel May ([SCI0098](#))

161 Home Office, *Home Office Indicators of Integration framework 2019 third edition*, May 2022

162 [Q 102](#) (David Goodhart)

163 Written evidence from Reunite Families UK ([SCI0483](#))

164 Written evidence from Dr Gwyneth Loneragan ([SCI0510](#)); the School of Governance of the Human Rights Solidarity ([SCI0534](#))

163. **The Committee is alarmed at reports of visa sponsor abuse. This actively harms integration outcomes, exposing thousands to penury, preventing full participation in the labour market, delaying settlement, and ultimately stopping those tied to sponsors from integrating into British society.**
164. *The Committee supports the call to decouple visas from sponsors and tie them to sectors. To mitigate the risk to sponsors paying sponsorship fees, those switching companies would be required to pay back sponsorship costs, prorated over the year.*
165. **We would like to see further evidence that volunteering is as significantly beneficial to integration outcomes as the proposed 3–5-year reduction to the ILR baseline implies. We are also concerned at how volunteering will be assessed, alongside access to volunteering and the potential for exploitation.**

### Income thresholds

166. Alongside the minimum threshold of £12,570 to qualify for any reductions in the time needed to qualify for settlement, as noted above the Government have proposed that migrants could secure a reduction of 5 years if they earn £50,270, the higher rate income tax threshold. Dr Sumption questioned the logic of this threshold, stating that “it is less obvious what the benefit would be of keeping people earning between £40,000 and £50,000 in a temporary status for longer.”<sup>165</sup>
167. It is unclear why the earned settlement Immigration White Paper focuses solely on individual income, rather than household income. The Refugee and Migrant Centre, a charity based in the West Midlands, observed that one parent in a household may be the primary earner while the other has primary childcare responsibilities, which is not reflected in the White Paper.<sup>166</sup> Indeed, under the proposals, a non-working dependant would not qualify for ILR even if their partner was in the top 1% of the earnings distribution.
168. The Law Society of England and Wales indicated that “attracting overseas talent is likely to receive more resistance if the general position is that employees and/or their family members are required to wait longer to qualify for settlement/citizenship.”<sup>167</sup>
169. The income threshold may also impact the regions and nations of the UK unequally, with migrants in some areas being less likely to meet the £50,270 and £125,140 income thresholds required to qualify for 5-year and 7-year reductions to the ILR qualifying period. Lewis Silkin LLP told us “there are stark disparities in average salaries across the regions of the UK which the government does not consider. Outside of London and the Southeast of England, the taxable earnings thresholds are much less easily achieved” They cite median salary levels of £30,732 in Wales and £31,232 in Northern Ireland.<sup>168</sup> Similarly, the Long Residenciers Advocacy Group noted that the higher rate tax threshold in Scotland is lower than in England (£43,663 as opposed to £50,270), meaning that some migrants paying the higher tax rate in Scotland would not qualify for a reduced path despite making

165 [Q 115](#) (Madeleine Sumption)

166 Written evidence from the Refugee and Migrant Centre ([SCI0499](#))

167 Written evidence from the Law Society of England and Wales response ([SCI0378](#))

168 Written evidence from Lewis Silkin LLP ([SCI0609](#))

proportionally higher tax contributions than higher earners in other parts of the UK.<sup>169</sup>

170. **The individual income thresholds which earn a reduction in the qualifying time to ILR are not linked to migrants' net fiscal impact but instead are set at the higher and upper Income Tax rate thresholds. As a result, some migrants who are net contributors to the public finances would be required to wait 10 years to acquire ILR. Proposals should focus less on income, and more on making a positive contribution.**
171. *The income levels which lead to a reduction in ILR pathways should not be set according to Income Tax thresholds but should be set on the advice of the Migration Advisory Committee (MAC). It should be asked to consider the impact of migration on the public finances and the impact on regional labour markets when setting these thresholds.*
172. *The Government should reassess, with advice from the MAC the income thresholds which lead to a reduction in settlement timelines, as well as the scale of these reductions. At the same time, they should explore other contributing reductions.*
173. *We believe the Government should explore mechanisms whereby migrants with dependent visas should be able to qualify for ILR as the work visa holder if the income is sufficiently high that the household places no burden upon the state.*

### English language requirements

174. This section focuses on English language requirements for adults. The requirements for children and adults differ and provision for English language education sits with the Department for Education, not the Home Office.
175. Current language requirements for the most common visa routes are set out in Chapter 1. This includes the new requirements laid in March 2026 and due to come into effect in March 2027, most notably the raising of thresholds for the majority of categories from B1 to B2. The Government is considering whether C1 (Degree equivalent) should mean migrants receive a one-year reduction of the qualifying time for ILR.
176. The UK currently requires an English Language test that meets the following criteria:
  - be on the list of approved tests;
  - have been sat at an approved location (can be in the UK or abroad);
  - be awarded within two years of the application.

For the majority of visas, a test assessing reading, writing, speaking, and listening is required. For some visas, and for ILR and citizenship, only a test assessing speaking and listening is required.<sup>170</sup>

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169 Written Evidence from Laura Devine Immigration ([SCI0550](#)) and the Long Residenciers Advocacy Group ([SCI0442](#))

170 UK Visas and Immigration, *Prove your English language abilities with a secure English language test (SELT)*, June 2026

177. Many witnesses have highlighted the crucial role that language plays in integration outcomes. Professor Alan Manning told us: “I am generally in favour of language requirements being important—people who cannot communicate find it harder to understand each other”.<sup>171</sup> Sunder Katwala said, “I think language is absolutely foundational to full participation in your society—in education, work, civic life and politics. In the post-1948 wave of migration, we did not really value it enough.”<sup>172</sup>
178. The Minister for Migration and Citizenship, Mike Tapp MP told us
- “Without talking, it is very difficult to form relationships, to integrate and to contribute. This is a reason why, as part of earned settlement, we are increasing the English language requirement. I absolutely welcome the idea of taking this into communities to help upskill those who may be struggling to speak English. It is vital that we communicate.”<sup>173</sup>
179. This view is echoed in the Social Cohesion Strategy. It states that
- “It is impossible for people to engage with others, build relationships, and develop mutual understanding if they lack the words to do so. The ability to use and understand our shared language should be a fundamental basis for participating in society and an expectation of those who wish to call the UK home.”<sup>174</sup>
180. Evaluation of policy in Denmark which made language training mandatory for refugees and reunited family members, and increased the duration of the training, found “significant and persistently positive effects on employment rates”.<sup>175</sup> In England, research focusing on 180 resettled refugees four years after they came to the UK found links between English language skills and “more social contacts, higher levels of well-being, higher employment rate, higher participation in training and education, better health, and stronger sense of their self-efficacy”.<sup>176</sup>
181. Language skills were also linked with better work outcomes, which as noted above would drive integration. The Bell Foundation noted that individuals with higher English proficiency were more likely to be employed or in better-paid roles, whereas low-level proficiency was associated with underemployment or skills mismatches.<sup>177</sup> The Work Rights Centre have linked lower English proficiency with greater risk of labour exploitation.<sup>178</sup>
182. The 2021 census showed that 445,740 migrants who had been resident in Britain for a decade or more either could not speak English well or at all. This accounts for 8% of migrants resident in the UK for 10+ years, including people who migrated from predominantly English-speaking countries. However, as highlighted by the Bell Foundation, if you only look at those

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171 [Q 18](#) (Professor Alan Manning)

172 [Q 18](#) (Sunder Katwala)

173 [Q 169](#) (Mike Tapp MP)

174 Ministry of Housing, Communities & Local Government, *Protecting What Matters: Towards a more confident, cohesive, and resilient United Kingdom*, [CP 1540](#), April 2026

175 Written evidence from the Bell Foundation ([SCI0491](#))

176 Written evidence from Dr Linda Morrice et al ([SCI0371](#))

177 Written evidence from the Bell Foundation ([SCI0491](#))

178 Work Rights Centre, *Systemic drivers of migrant worker exploitation in the UK*, November 2023; see also written evidence from Cambridge University Press and Assessment ([SCI0355](#)).

whose main language is not English<sup>179</sup>, the proportion rises to 20.5%.<sup>180</sup> Of these 445,740 migrants, 59.5% were British citizens.

183. Those with lived experience had a variety of views on language requirements. A number of submissions agreed that requiring a certain level of English prior to arrival in the UK is acceptable, though some noted that for particular routes, such as refugee or humanitarian, this will not be suitable. The consensus was that after arrival in the UK the level of English required needs to be realistic, accessible and affordable, with support provided to access English language support. Submissions took a varied view on the English level needed, believing that this should be flexible depending upon the individuals concerned. For example, some argued that dependants might not need as high a level because they are supported by the main applicant, or that the older generation may struggle with higher requirements.<sup>181</sup>
184. The Committee heard a number of arguments against applying language requirements too rigidly. Dr Madeleine Sumption told us that having a very high requirement for family members of British citizens would prevent some British citizens being joined by family members.<sup>182</sup>
185. Professor Gareth Davies argued for a distinction considering vulnerable and disadvantaged groups.

“I entirely accept the point about closed communities and women who stay at home. At the same time, if you have recognised someone as an asylum seeker fleeing persecution, it is hard to justify saying, ‘You can’t see your family until they’ve learned English’, when they are in difficult circumstances somewhere in the world.”<sup>183</sup>

186. The Bell Foundation told us of the difficulties that different groups may have in learning English, as “The greater the distance between an individual’s primary language and English, the higher the ‘tax’ they must pay in mental effort, time, and resources to achieve proficiency.” They gave the example that:

“a speaker of Dutch (very close to English) can typically reach professional fluency in roughly 600 hours of study. Conversely, a speaker of Arabic, Cantonese, or Japanese (linguistically distant) may require over 2,200 hours to reach the same level.”<sup>184</sup>

#### *English for Speakers of Other Languages (ESOL) provision*

187. A number of witnesses were concerned at the lack of English for Speakers of Other Languages (ESOL) provision,<sup>185</sup> particularly in light of raised requirements. The Bell Foundation told us that “the demand for English for Speakers of Other Languages (ESOL) education is growing (up by 17% since 2021) but current provision is not reaching many of those who need it”.<sup>186</sup> They stated that “classroom-based adult education spending has reduced by

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179 Stated as being a person’s first or preferred language.

180 Written evidence from the Bell Foundation ([SCI0491](#))

181 See Appendix 5.

182 [Q 116](#) (Dr Madeleine Sumption)

183 [Q 67](#) (Professor Gareth Davies)

184 Written evidence from The Bell Foundation ([SCI0491](#))

185 See glossary.

186 Written evidence from The Bell Foundation ([SCI0491](#))

two thirds since 2003/4 and has been impacted by a further 6% cut to the Adult Skills Fund this year”.<sup>187</sup>

188. This is not a fresh concern. The House of Lords Select Committee on Citizenship and Civic Engagement, writing in 2018 highlighted issues with access to ESOL classes, barriers to parents accessing classes, and reduced funding for ESOL provision.<sup>188</sup>
189. The Coalition for Language Education told us that “there is no UK-wide policy for ESOL. Wales currently has a national ESOL strategy, while Scotland’s successful ESOL strategy was discontinued in 2020 and England has never had one.”<sup>189</sup> The Migrants’ Rights Network told us that Northern Ireland has no ESOL strategy and “significant waiting lists to accessing ESOL services” and argued that this meant migrants in Northern Ireland face a “particular disadvantage ... around the English language ability reductions that risks punishing migrants for a structural issue of a lack of service provision”.<sup>190</sup>
190. The Government has announced a “review” of language provision as part of its cohesion strategy, with conclusions expected in the Autumn. However, whilst it makes mention of “exploring how innovation, including digital delivery can increase the numbers able to speak English” and that the Government has “already strengthened English language requirements for new arrivals”, the word ESOL does not appear at all, and there is no mention of increasing provision.<sup>191</sup>
191. **Learning English is a central pillar of integration, and the Committee supports the increased emphasis placed on English language skills in the Government’s White Paper and Social Cohesion Strategy, in particular the raising of language thresholds. The Committee accepts that refugees and asylum seekers will not always have English language skills prior to entering the UK. However, it is reasonable to expect that the vast majority of those granted leave to remain, including dependents, learn English as soon as is practical.**
192. **While policy and strategy are crucial for enabling those settling in the UK to learn English, this should not detract from it being incumbent on those settling in the UK to take steps to learn English. The Government must provide the opportunities for migrants to learn English, migrants must take them.**
193. **Certain migrant groups, namely refugees, are unlikely to reach their full potential without adequate language and employment support. Yet English for Speakers of Other Languages courses are oversubscribed, and provision is uneven across the UK.**
194. **The Government lacks an ESOL strategy, and access to ESOL provision is a postcode lottery. We welcome the review into language provision, which is long overdue. However, we are concerned that**

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187 *Ibid.*

188 Select Committee on Citizenship and Civic Engagement, *The Ties that Bind: Citizenship and Civic Engagement in the 21st Century*, (Report, Session 2017–19, HL Paper 118)

189 Written evidence from The Coalition for Language Education ([SCI0393](#))

190 Written evidence from Migrants Rights Network ([SCI0455](#))

191 Ministry of Housing, Communities & Local Government, *Protecting What Matters: Towards a more confident, cohesive, and resilient United Kingdom*, [CP 1540](#), April 2026

**a commitment to publish conclusions will not result in a dedicated ESOL strategy.**

195. *The Government must increase ESOL provision so that supply meets demand and encourage migrants to utilise language courses. This should be delivered through a national strategy, to ensure that everyone has access to language provision. The Government should take steps to include access to English for Speakers of Other Languages courses for people on the path to settlement.*

### **Impact on vulnerable groups**

196. A concern raised by some witnesses was that certain groups would find it more difficult to meet the mandatory requirements and qualifying time reductions, including people with disabilities or chronic illnesses who are unable to work, and unpaid carers or single parents whose time commitments limited their ability to work longer hours, attend ESOL classes or engage in community work.<sup>192</sup>
197. The3million, a campaign group representing EU citizens living in the UK, said that the proposed “punishment” of increasing time towards settlement for people who have received welfare support before being granted ILR “will push families and vulnerable people into more deprivation, exploitation and dangerous circumstances”.<sup>193</sup>
198. In the earned settlement Immigration White Paper, the Government stated that certain vulnerable groups would qualify for a reduction in their qualifying time, subject to consultation. Specifically, the consultation invited views as to whether people on maternity leave or with long-term illnesses and disabilities should be exempted from the mandatory requirement to have income of above £12,570 for three to five years.
199. **While we broadly support the mandatory requirements proposed in the earned settlement Immigration White Paper, they are too rigid. Migrant dependants would be unable to acquire ILR if they were not working, even if the main applicant was making a very significant net positive fiscal contribution. Similarly, victims of trafficking and exploitation who had been coerced or compelled to commit criminal offences would also be unable to meet the mandatory requirement of having no criminal convictions, and people on maternity leave or with long term disabilities may face challenges to meet mandatory income requirements.**
200. *The Government should introduce exemptions which consider particularly vulnerable groups. Migrants on maternity leave and those with long-term illnesses or disabilities should be exempt from meeting the mandatory requirement of having an income of £12,570 for three to five years. This exemption should also cover unpaid carers.*

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192 For instance, written evidence from the Helen Bamber Foundation (SCI0429), NRP Network (SCI0454), the3million (SCI0456), and the Work Rights Centre (SCI413).

193 Written evidence from the3million (SCI0456)

### Impact on children

201. A number of our witnesses expressed concern over the impact that the Government’s proposals will have on the children of migrants. Barry O’Leary had concern about children who would be born whilst their parents were on longer routes to settlement. “We are going to produce a lot more children born in the UK who are not British citizens. Maybe that is the goal, but it is not a very integratory goal.”<sup>194</sup>
202. Dr Roxana Barbulescu, Associate Professor at the University of Leeds told us “the status of dependent children remains intrinsically linked to that of their parents. For children who arrived in the UK or were born there, concerns arise regarding their eligibility for settlement and the associated rights it confers ... Such restrictions risk perpetuating intergenerational disadvantage and limiting social mobility”<sup>195</sup>
203. The Refugee and Migrant Forum of Essex and London explained
- “research from University College London shows that children born into the poorest fifth of families in the UK are twelve times more likely to face poor health and educational outcomes by age 17 compared with their peers from better-off households. When parents cannot secure ILR, or avoid claiming public funds to protect their immigration status, they are pushed into deeper poverty. Their children grow up with fewer opportunities, worse health, and limited chances to thrive. The long term economic and social impacts of increasing settlement routes will then greatly reduce the life prospects of children born to parents placed on these routes. These children will either be or will become British citizens. Their future is here, and there is no public interest served by greatly harming their life chances.”<sup>196</sup>
204. The Refugee and Migrant Children’s Consortium said that the proposals would mean that “children would be on very different routes to settlement—with unequal access to systems of support, to education [most notably having to pay higher University fees] and to opportunities as they grow up and enter adulthood—based not on their needs but on a judgement about their parents including simply how much they earn.”<sup>197</sup>
205. Professor Alan Manning perhaps encapsulated a lot of the evidence we received in saying “we cannot ask for contribution from children. Is it then right for the contribution of the parents to be judged by that of the children?”<sup>198</sup>
206. The House of Commons Home Affairs Committee, in their March 2026 report on earned settlement, recommended that “Children who arrive at a young age and grow up in the UK should be granted settled status by the age of 18 without needing to fulfil the requirements of the ‘Earned Settlement’ model, in recognition of the fact that Britain is their home.”<sup>199</sup>
207. **The changes being proposed will have a significant impact on children, likely delaying settlement for many, with associated**

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194 [Q 22](#) (Barry O’Leary)

195 Written evidence from Dr Roxana Barbulescu ([SCI0473](#))

196 Written evidence from The Refugee and Migrant Forum of Essex and London ([SCI0490](#))

197 Written evidence from The Refugee and Migrant Children’s Consortium ([SCI0593](#))

198 [Q 7](#) (Professor Alan Manning)

199 Home Affairs Committee, *Earned Settlement: Examining the Government’s proposed reforms* (6th Report, Session 2024–26, HC 1409)

**negative outcomes such as poverty, poor health, and reduced access to opportunities. The Committee does not feel it is fair to judge children by the decisions and actions of their parents.**

208. *We strongly support the recommendation of the Home Affairs Committee that children who arrive at a young age and grow up in the UK should usually be granted settled status by 18, and that children who arrive at a later age should have clear and accessible pathways to settlement.*

#### **Absence of an integration strategy**

209. As referenced in Chapter 1 (para 4), the committee is acutely aware that there are many in the UK who are alienated and discomfited by the changes in their communities as a result of immigration. The need to improve social cohesion is urgent which is why we have welcomed the recently published Social Cohesion Strategy. However, our report focuses on what happens to people once they have come to the UK and determined they wish to make the UK their permanent home.
210. Dame Sara Khan’s review of social cohesion recommended the Government should publish a strategy on integration. However, the review argued this should be separate from the Government’s broader strategy for strengthening social cohesion and that an effective strategy for integration should focus on helping new migrants integrate successfully when they come to the UK.<sup>200</sup>
211. The recently published Social Cohesion Strategy includes a commitment to “develop an effective cross-government integration strategy” owned by MHCLG. This will “help existing and new migrants effectively integrate into their communities, find sustainable work, and make a positive contribution to their area.”<sup>201</sup>
212. At present however, and as we heard many times throughout the inquiry,<sup>202</sup> there is no up-to-date national integration strategy, and no timetable has been published for the development of one. Dr Madeleine Sumption told us that while the Home Office “has carried out various ad hoc exercises” such as producing “a set of indicators of integration” this work had not fed into “any coherent strategy” for integration.<sup>203</sup> The International Rescue Committee lamented the missed opportunity of the report, noting that the Indicators for Integration framework “set forth clear evidence-based methods for measuring integration, but without a national strategy for its use”.<sup>204</sup>
213. However, work on developing such a strategy is complicated by the differing responsibilities of the UK Government and the devolved administrations. The Coalition for Language Education told us that immigration and citizenship policy, setting out “who is allowed to settle/naturalise”, is reserved, while integration policy is “largely a matter for the devolved administrations of Scotland, Wales and Northern Ireland”, and in England is devolved to

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200 Dame Sara Khan, *The Khan Review - Threats to Social Cohesion and Democratic Resilience: A New Strategic Approach*, March 2024

201 Ministry of Housing, Communities & Local Government, *Protecting What Matters: Towards a more confident, cohesive, and resilient United Kingdom*, CP 1540, April 2026

202 Q 85 (Professor Thom Brooks), Q 109 (Dr Madeleine Sumption), Q 142 (Jon Simmons)

203 Q 109 (Dr Madeleine Sumption)

204 Written evidence from the International Rescue Committee (SCI0507)

local authorities, leading to “major local differences”.<sup>205</sup> As mentioned in Chapter 7, responsibility for social cohesion sits with MHCLG.

214. The Refugee Council told us that England was an outlier in not having a strategy, noting that the devolved nations “have all developed their own strategies”. They went on to recommend that the Government publish a national strategy on integration which “engages stakeholders at national, regional, local, and community levels to ensure that support is coordinated from day one, creating a foundation for long-term stability”.<sup>206</sup>
215. Jon Simmons stated that the Home Office’s “Indicators of Integration” report published in 2019 provides a “framework for understanding and measuring integration outcomes along with a well-evidenced road map for the development of strategies to support better integration”, and noted that the report informed both Norway’s National Integration Strategy and Wales’s Nation of Sanctuary scheme, which aims to integrate refugees and asylum seekers.<sup>207</sup>
216. Despite the urgency for an Integration Strategy, we recognise this is not an easy task. David Goodhart articulated the issues with creating a strategy for integration:
- “Integration is an extremely difficult thing to talk about and legislate for in a liberal society, and one of the points of a liberal society is that you do not actually have to conform to the common norms of society. Clearly, a society works better when the vast majority of people do sign up to common norms but, so long as people obey the law and pay their taxes, in a liberal society there is not very much you can do.”<sup>208</sup>
217. **The Committee notes with disappointment that no strategy for integration in England was written following the publication of Indicators for Integration. This was a missed opportunity. We welcome the commitment to develop an effective cross-government integration strategy but are concerned that the lack of date of publication means that the issue is being kicked into the long grass.**
218. *The Government should publish its integration strategy for England no later than the end of 2026. The Government has a useful base in the Indicators of Integration, which the Committee recommends informs this strategy.*

### Integration as a two-way process

219. Over the course of the inquiry, we repeatedly heard that integration is a two-way street. We heard that “the process of building cohesive societies is bidirectional and goes beyond the individualised notion of migrant integration”.<sup>209</sup> Professor Christian Joppke said that there is a two-way process in which “migrants have the burden of taking up the language of the

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205 Written evidence from The Coalition for Language Education ([SCI0393](#))

206 Written evidence from the Refugee Council ([SCI0400](#))

207 Supplementary written evidence from Jon Simmons ([SCI0606](#)); see also Norwegian Ministry of Education and Research, *Integration through Knowledge*, November 2019 and Jane Hutt MS, Cabinet Secretary for Social Justice, Trefnydd & Chief Whip, *Written Statement: Nation of Sanctuary for people placed in Wales*, October 2025.

208 [Q 99](#) (David Goodhart)

209 Written evidence from Dr Aneta Piekut, Dr Zanib Rasool ([SCI0470](#))

new place and acquiring its basic civic knowledge, while, in turn, receiving societies have to make space for these newcomers and provide resources”.<sup>210</sup>

220. The House of Lords Select Committee on Citizenship and Civic Engagement wrote in their 2018 report “Integration is a two-way street ... We need on the one hand to support indigenous communities faced with rapid social and cultural change, and to help newcomers meet the challenge of understanding and engaging with the language and culture of the country they have made their home”.<sup>211</sup>
221. The recently published Social Cohesion Strategy also uses the phrase “integration is a two-way street” going on to say that “we all share a role in providing opportunities for people to participate free from fear of discrimination or bigotry, while newcomers have a responsibility to engage with and embrace what it means to be British.”<sup>212</sup> The Minister for Citizenship and Migration, Mike Tapp MP shared a similar view, telling us “The Government and local communities have a responsibility to encourage integration at the school level, as well as at the community group level ... It is absolutely vital that people make the effort to integrate.”<sup>213</sup>
222. A number of witnesses felt that the UK was not doing enough on its side to ensure that migrants integrated. Dr Gwyneth Lonergan of Northumbria University stated that it was “increasingly unclear what the UK is *offering* to migrants” and argued that the Government’s proposed policy changes “disincentivise putting down roots and developing a sense of loyalty to the UK.”<sup>214</sup>
223. However, Alp Mehmet placed more emphasis on the role of the migrant, whilst acknowledging this two-way process, stating: “Immigrants have to want to integrate. They have to want to be a part of the country.”<sup>215</sup>
224. **The nature of earned settlement puts the onus on migrants to integrate. However, as acknowledged by the Government, integration is a two-way street. Those coming to the UK have to want to integrate, and both UK society and the Government have to facilitate that. Migrants choose to make the UK their home, and in so doing, create an expectation that they will integrate into society. However, the UK also chooses to admit them, and in so doing, creates a reciprocal expectation that conditions are created whereby integration is not only possible, but likely.**
225. ***When developing its integration strategy, the Government must set clear and achievable measures and targets for migrant integration and provide them with the structures to do so. This will enable migrants to the UK to actively integrate into receiving societies.***

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210 [Q 63](#) (Professor Christian Joppke)

211 Select Committee on Citizenship and Civic Engagement, *The Ties that Bind: Citizenship and Civic Engagement in the 21st Century* (Report, Session 2017–19, HL Paper 118)

212 Ministry of Housing, Communities & Local Government, *Protecting What Matters: Towards a more confident, cohesive, and resilient United Kingdom*, [CP 1540](#), April 2026

213 [Q 155](#) (Mike Tapp MP)

214 Written evidence from Dr Gwyneth Lonergan ([SCI0510](#))

215 [Q 100](#) (Alp Mehmet)

## CHAPTER 6: SETTLEMENT AND CITIZENSHIP

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226. The route to citizenship is riven with complexity. However, there are two notable milestones along the route. Indefinite Leave to Remain (ILR, otherwise known as settlement) represents the point in the journey where repeated applications are no longer necessary, and a person's status as a permanent (with some caveats) member of British society is confirmed. The second milestone, citizenship (by naturalisation or registration) is a powerful and significant commitment to life in the UK.
227. This chapter examines the differences between obtaining ILR and citizenship, both to the state and the individual. It highlights the high cost of the process, and the lack of available support. We return to our earlier work on the Life in the UK test,<sup>216</sup> criticising both the test and repeated Government inaction. The chapter closes with a look at Citizenship Deprivation Orders, and what that says about the UK's view of, and obligations to, its citizens.

### The complexity of the process and the rules

228. Throughout this inquiry, we heard that the complexities of navigating the system from the view of the applicant were substantial. Whilst legal experts said that applications could be “straightforward”,<sup>217</sup> and that “the rules can be complex, but the process is not”,<sup>218</sup> this was challenged by others. Many of the submissions we received from those with lived experience referred to the complexity, stress, and expense involved in the existing ILR and citizenship processes, even without the proposed reforms.<sup>219</sup> This was echoed in a survey of migrants (n=225) conducted by the Migrants' Rights Network, which found that the majority of respondents felt that the immigration system is “already difficult, unclear and expensive”.<sup>220</sup>
229. Reunite Families UK outlined many of the issues with the current system: “Frequent rule changes, multiple eligibility routes, and extensive documentary requirements create barriers, particularly for vulnerable groups.” They also noted that applicants are “required to provide extensive documentation ... which is sometimes impossible to obtain”.<sup>221</sup>
230. Witnesses told us that much of the complexity is “built in” to the system.<sup>222</sup> Professor Thom Brooks called the UK immigration system a “Frankenstein-like patchwork quilt”, developed incrementally over decades.<sup>223</sup> Perhaps the most damning indictment came from Zoe Bantleman, legal director at the Immigration Lawyers Practitioners Association (ILPA). She told us of “the unwieldy complexity of the Immigration Rules, but also immigration legislation ... It is difficult for me to keep on top of it, and it is my full-time job to do so.”<sup>224</sup>

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216 Correspondence, *Chair of Justice and Home Affairs Committee to Kevin Foster MP, Parliamentary Under Secretary of State (Minister for Safe and Legal Migration)*, 28 June 2022

217 Written evidence from the Law Society of England and Wales ([SCI0378](#))

218 [Q 37](#) (Barry O'Leary)

219 See Appendix 5.

220 Written evidence from Migrants' Rights Network and Not a Stranger Campaign Group ([SCI0455](#))

221 Written evidence from Reunite Families UK ([SCI0483](#))

222 Written evidence from the Latin American Women's Rights Service ([SCI0468](#))

223 Supplementary written evidence from Professor Thom Brooks ([SCI0607](#)); see also written evidence from the Law Society of Scotland ([SCI0614](#)).

224 [Q 30](#) (Zoe Bantleman)

231. The cost of making a mistake in applications can be substantial. The Islington Law Centre, talking specifically about the 10-year route to settlement, explained that applicants must make a valid in-time application for leave to remain on expiry of each grant of leave to remain, and these cannot be made more than 28 days in advance. A mistake in an application can result in the applicant becoming unlawfully present, and so liable to detention, prosecution, and removal, a loss of accommodation and work, and time already accrued on the 10-year process discounted.<sup>225</sup>
232. Many witnesses called for a simplification of the immigration rules and immigration legislation.<sup>226</sup> This echoes the call of Wendy Williams’ 2020 Windrush Lessons Learned Review, which argued for a reduction in “the complexity of immigration and nationality law, immigration rules and guidance”. The Review also recommended expanding the work of the Law Commission from looking solely at statute revision to simplifying the Immigration Rules,<sup>227</sup> a case which had been made in a 2020 Law Commission report on the simplification of the Immigration Rules.<sup>228</sup>
233. The 2022 ‘Windrush Lessons Learned Review: progress update’ acknowledged that progress had been made, but that the recommendation had not been met.<sup>229</sup> Moreover, the Latin American Women’s Rights Service highlighted that the intention to “introduce substantially more complex rules through the Earned Settlement model shows a failure to learn from the Windrush scandal”.<sup>230</sup> Dr Mike Slaven called for the Government to “work seriously to implement all the recommendations of the Windrush Lessons Learned Review”.<sup>231</sup>
234. Even the Government appears to find the system complex. As explored in Chapter 7, we heard that delays in processing applications were common, potentially resulting in people being treated as overstayers while their case is considered. The Law Society of Scotland told us that, under the Immigration Act 1971,<sup>232</sup> whilst an application is under consideration “the applicants’ leave to remain usually continues automatically”, but that “applicants with this status often encounter difficulties proving their right to reside, work, and access public funds in the UK” as employers and “even DWP staff are often unfamiliar with the process of checking an applicant’s right to work”.<sup>233</sup>
235. **The Committee finds the farrago of immigration rules and legislation to be anathema to good governance. A system that confuses experts in the field is clearly systematically unworkable, and results in delay, additional cost, poor decision-making, and miscarriages of justice.**
236. ***The Government must urgently simplify both the immigration rules and immigration legislation, fully implementing the recommendations of the Windrush Lessons Learned Review,***

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225 Written evidence from Islington Law Centre ([SCI0503](#))

226 [Q 33](#) (Barry O’Leary), Written evidence from Ms Lam ([SCI0527](#)), Written evidence from Dr Humphrey Lau ([SCI0530](#)), Supplementary written evidence from Professor Thom Brooks ([SCI0607](#)), written evidence from the Royal College of Nursing ([SCI0613](#)) and Sai Chak Wong ([SCI0452](#))

227 Home Office, *Windrush Lessons Learned Independent Review by Wendy Williams*, July 2018

228 Law Commission, *Simplification of the Immigration Rules: Report*, January 2020

229 Home Office, *Windrush Lessons Learned Review: progress update*, March 2022

230 Written evidence from the Latin American Women’s Rights Service ([SCI0468](#))

231 Written evidence from Dr Mike Slaven ([SCI0315](#))

232 Immigration Act 1971, [section 3\(c\)](#)

233 Written evidence from the Law Society of Scotland ([SCI0614](#))

*including that the Law Commission’s remit should be expanded to examine simplifying the Immigration Rules. This work will become all the more pressing if the Government goes ahead with many of its proposed changes, which will only serve to add further layers of complexity to the process.*

237. *The Home Office should take steps to improve understanding of leave to remain extensions while an application is being considered, particularly amongst government departments and public services.*

### The cost of settlement and citizenship

238. The Committee heard from many witnesses that the fees associated with the UK’s settlement and immigration system are considerably more expensive than in other comparable countries, with fees set at several times the processing cost.<sup>234</sup> This view was echoed by many of our respondents with lived experience, who noted the expense of the UK system, especially in relation to other countries. As noted in Chapter 3, they also felt that extending the time taken to obtain ILR and citizenship would only increase costs further.<sup>235</sup>

### Box 2: Case study—experience of fees in the migration and settlement journey

Current fees:

- A student visa for the duration of the course cost £558
- A three-year work visa cost £819
- Permission to stay in the UK as a spouse cost £1,407
- Settlement cost £3,226
- Naturalisation as a British citizen cost £1,709 (plus £130 citizenship ceremony fee)

Most migrants moving to the UK also need to pay a separate Immigration Health Surcharge of £1,035 per year, or £776 for students and children.

Source: Home Office, [Home Office immigration and nationality fees, 8 April 2026](#), March 2026

239. The fees to obtain citizenship alone are £1,839.<sup>236</sup> Sunder Katwala told the Committee, “I could get six quite attractive citizenships—America, Australia, Canada, New Zealand, Germany, France all together—and still have change”.<sup>237</sup> The Society of Spanish Researchers in the United Kingdom told us that the cost of an ILR application was £3,029, not including the £50 cost of the Life in the UK test. They stated that “This is 160 times higher than the cost of application for a permanent residence permit in Spain, which costs 21.87€ (Approx. £19.16).”<sup>238</sup>

234 Written evidence from Laura Devine Immigration ([SCI0550](#)), the Royal college of Nursing ([SCI0613](#)) and the Central England Law Centre ([SCI0394](#))

235 See Appendix 5.

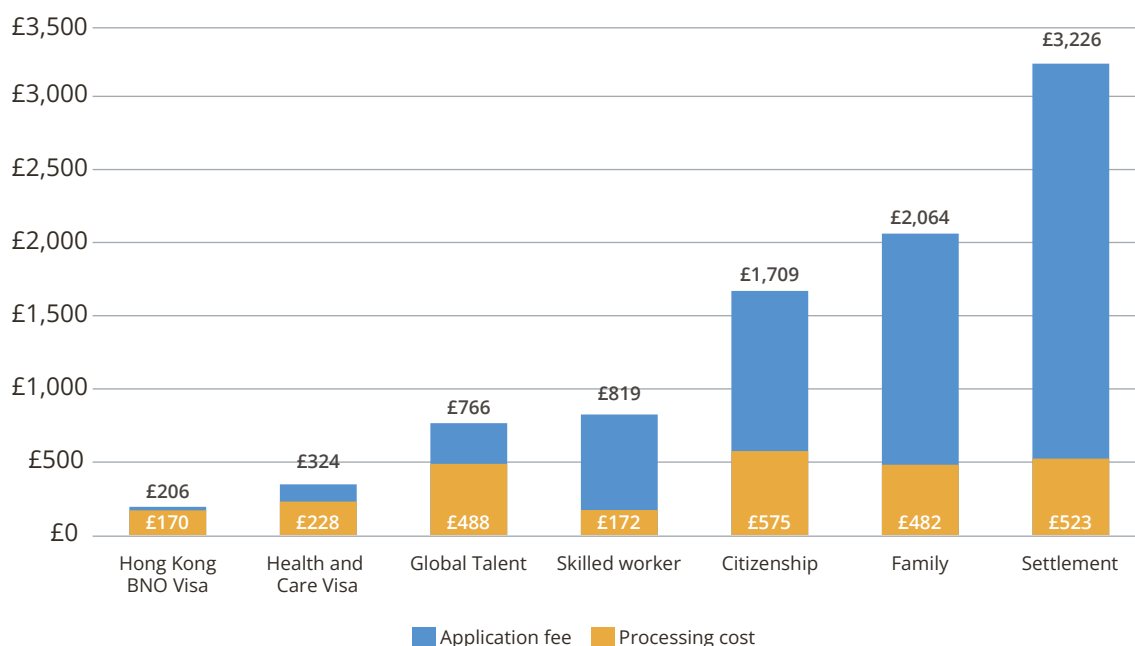
236 UK Visas and Immigration, [Apply for citizenship if you have indefinite leave to remain or ‘settled status’: Eligibility and fees](#) [accessed 12 May 2026]

237 [Q 15](#) (Sunder Katwala). NB: Mr Katwala spoke when the cost was £1,735.

238 Written evidence from the Society of Spanish Researchers in the UK ([SCI0458](#)). NB the cost at time of publication is now £3,226. Euro to GBP conversion correct at time of submission.

240. There are waivers for ILR applications in specific situations, such as applicants applying under the domestic violence, bereaved partner routes (who must apply for and be granted fee waivers before submitting their ILR applications) and children in local authority care.<sup>239</sup>
241. Fees are set significantly above the cost of processing applications.<sup>240</sup> Tim Phillips explained that while the “principle in Government is that a fee should be set at a level that is expected to meet, but not exceed, the cost of delivering that service” the Home Office has a “specific waiver from the Treasury to allow it to do that.”. He noted that driving licences, courts and tribunal fees and passport fees are “set at a level that is 100% of the cost of processing, as understood at the time of setting it” but that immigration fees “are set at 212%. It is way beyond. They are intended to generate revenue.”<sup>241</sup> He explained that this money “has to be reinvested in the immigration and asylum system. The total raised in 2023–24 from immigration fees was £2.6 billion. That is considerably less than the total cost of the asylum and immigration system.”<sup>242</sup>

**Figure 4: Fees levied on common types of initial immigration application, April 2026**



Source: UK Visas and Immigration, [Visa fees transparency data](#), March 2026

242. As noted in Chapter 3, the high cost of fees can have a devastating impact, particularly amongst more vulnerable groups, and this may increase if longer routes to settlement are implemented. Bindmans LLP argued that those on a low income “will pay far more in visa fees [through repeated visa renewals], increasing the risk of poverty and destitution among migrants and their dependents” and stated that this would disproportionately affect women “due to career breaks, part-time work, and childcare needs”.<sup>243</sup>

239 Written evidence from Bindmans LLP ([SCI0348](#))

240 Home Office, [Home Office immigration and nationality fees, 11 November 2025](#), March 2026

241 [Q 140](#) (Tim Phillips)

242 *Ibid.*

243 Written evidence from Bindmans LLP ([SCI0348](#))

**Box 3: Extending time to settlement - Cost of fees**

For someone applying on the skilled worker route from outside the UK, an applicant can expect to pay: An application fee for 5 years of £1,618, plus an annual Immigration Health Surcharge (IHS) of £1,035. This would cost a total of £6,793. Assuming the baseline of the skilled worker route changes to 10 years and so no additional application fee is required at the 5-year point, adding in the costs of a further 5 years of IHS brings the total cost to our applicant of £11,968.

Costs would not only be borne by the applicant. To hire a skilled worker, an employer can expect to pay (depending on the size of the company): Sponsor licence of £611 or £1,682, a certificate of sponsorship for worker of £525, an annual Immigration Skills Charge of £480 or £1,320. This would cost a total of £3,536 for a small company, or £8,807 to a medium or large company. If these costs were extended to 10 years, the total costs would be £5,936 for a small company, or £15,407 to a medium or large company.<sup>244</sup>

Certain migrants such as those with refugee status are not subject to charges, while migrants who cannot afford to pay for family routes or child citizenship can apply for fee waivers. Fee waivers are available if the applicant and sponsor can show they cannot afford the fee after meeting their “essential living needs”.<sup>245</sup> Waivers can be granted for both the application fee and health surcharge, or for just the IHS.

243. Dr Ana-Maria Bliuc told us that other countries’ systems had “lower, differentiated fees for under-18 dependants, alongside proportionate adult fees” which could “reduce inequity while maintaining high rates of lawful adherence to requirements, naturalisation, and public confidence”.<sup>246</sup>

244. The issue of the high cost of fees is compounded by the limited availability of fee waivers. The absence of fee waivers for ILR means low-income applicants who cannot afford the £3,226 fee would be required to renew their temporary status to maintain their legal status in the UK.<sup>247</sup> The Central England Law Centre told us “The lack of a fee waiver for children’s ILR applications has been successfully challenged by way of judicial review but we are yet to see a change in Home Office policy (or a successful appeal by them).”<sup>248</sup>

245. The high costs of fees are borne not just by individuals, but also by businesses. As ILPA told us, “prolonged reliance on employer sponsorship brings escalating costs for businesses” and that for some businesses “particularly smaller businesses, those in labour-dependent sectors, or those conducting business outside of major urban areas, these cumulative costs could seriously stifle growth”.<sup>249</sup> Laura Devine Immigration laid out the costs to an employer for someone on a skilled worker visa:

- Sponsor licence application: between £574 to £1,579 (as of April 2026 £611 to £1,682)
- Certificate of Sponsorship for worker: £525

244 UK Visas and Immigration, *Visa fees transparency data*, March 2026

245 House of Commons Library, *UK Immigration fees*, February 2026

246 Written evidence from Dr Ana-Maria Bliuc (SCI0242)

247 For instance, written evidence from the Helen Bamber Foundation (SCI0429), Islington Law Centre (SCI0503), and Refugee and Migrant Forum of Essex and London (RAMFEL) (SCI0490)

248 Written evidence from the Central England Law Centre (SCI0394)

249 Written evidence from the Immigration Law Practitioners’ Association (ILPA) (SCI0514)

- Immigration Skills Charge: between £480 to £1,320 per year of sponsorship—for five years’ sponsorship, between £2,400 to £6,600
- Total: £3,499 to £8,704 (as of April 2026 £3,536 to £8,807)<sup>250</sup>

246. When asked about fees and affordability, the Minister for Migration and Citizenship argued that fees were “in the right place” and argued that “to bring these fees down, the likelihood is that the taxpayer would have to pick up the cost”. He said that “it is right that those who are using the immigration systems are the ones who fund it”. Discussing competitiveness with other countries, he reflected that living costs in different countries varied, noting that “for example, health insurance in the United States—and other countries too I am sure—significantly increases the cost.”<sup>251</sup>
247. **We do not object to the principle of profit-making fees, providing those fees are appropriately targeted. We are concerned that elevated fees compared with similar nations put the UK at a competitive disadvantage in encouraging global talent to invest and settle in the UK. Alongside this, fees as they currently stand represent a regressive tax, with those earning the least paying the most through repeated applications. The limited availability of fee waivers compounds this problem, as do plans to extend the qualifying time for settlement.**
248. *Profits made through above cost immigration fees should be reinvested into the system to expand the availability of fee waivers, particularly at the point of applying for ILR and citizenship.*
249. *The Government should cap immigration fees at 150% of costs to ensure the UK remains a competitive option for highly skilled workers, and ensure fees are reasonable for migrants.*

### The Life in the UK test

250. In the Immigration White Paper, the Government committed to a “refresh” of the Life in the UK test.<sup>252</sup> The recently published Social Cohesion Strategy also commits to a review of the test.<sup>253</sup> Passing the test is in many cases required for securing ILR and citizenship.<sup>254</sup> The test has been a longstanding interest of the Committee.

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250 Written evidence from aura Devine Immigration ([SCI0550](#))

251 [Q 164](#) (Mike Tapp)

252 Home Office, *Restoring control over the immigration system*, [CP 1326](#), January 2026

253 Ministry of Housing, Communities & Local Government, *Protecting What Matters: Towards a more confident, cohesive, and resilient United Kingdom*, [CP 1540](#), April 2026

254 Children and refugees do not need to pass the test in order to get settlement. Refugees who wish to become citizens do need to take the test.

#### Box 4: Justice and Home Affairs Committee letter on Life in the UK Test, 2022

In our letter in 2022, we found several problems with the Test:

- an official handbook full of obscure facts and subjective assertions (including offensive historical content),
  - inaccessible test centres,
  - poorly phrased questions that trivialise the process, and
  - costs that can be prohibitive for some.
- The Committee also stressed the need to reintroduce taught courses as an alternative for those who may find the test particularly challenging, as such courses are known to promote social cohesion and gender equality.

Source: Correspondence, *Chair of Justice and Home Affairs Committee to Kevin Foster MP, Parliamentary Under Secretary of State (Minister for Safe and Legal Migration)*, 28 June 2022

251. Witnesses were near universal in their dissatisfaction with the Life in the UK test. Those with lived experience told us that the current test does not reflect modern British life, with criticism that it is more of a memory test rather than equipping people with information on life in the UK and is not an effective way to assess commitment to the UK's culture and values. Suggestions for reform emphasise the need to focus on practical information on rights and responsibilities, British values and democratic participation.<sup>255</sup>
252. One of the most common criticisms of the test revolved around the theme, as said by Professor Thom Brooks, that it was like “a bad pub quiz” and a “test that few British citizens can pass”.<sup>256</sup> Mike Tapp MP told us that test satisfaction was high “around 92%”, but that when the contract for the Life in the UK test expires in 2027 and goes out to tender, the Government will ensure that “the questions both are sensible and reflect your ability to integrate.”<sup>257</sup>
253. There were repeated calls for a greater focus on British values in the test<sup>258</sup> and practical civic competence (for example, what to dial in an emergency, or how to open a bank account).<sup>259</sup> Professor Gareth Davies told us: “It is hard to imagine that these tests meaningfully make anyone more British ... or that they even fundamentally change their attitudes to a great extent.”<sup>260</sup> Dr Sumption said, “I do not think we should kid ourselves that we can actually look into people's hearts through this process.”<sup>261</sup> Hibiscus Initiatives called for the test's removal, arguing that it does not meaningfully measure knowledge of British life, and “functions only as an additional barrier, particularly for those with low incomes, limited English, caring

255 See Appendix 5.

256 [Q 86](#) (Professor Thom Brooks)

257 [Q 170](#) (Mike Tapp MP)

258 Written evidence from Dr Anna Tuckett ([SCI0369](#)) and supplementary written evidence from Professor Thom Brooks ([SCI0607](#))

259 Written evidence from Dr Dilek Çelebi ([SCI0583](#)), Southall Black Sisters ([SCI0600](#)), the Arts and Humanities Research Council Connecting Solidarities project ([SCI0601](#)) and Dr Ana-Maria Bliuc ([SCI0242](#))

260 [Q 66](#) (Professor Gareth Davies)

261 [Q 117](#) (Dr Madeleine Sumption)

responsibilities or little free time, again disproportionately impacting Black and minoritised migrant women.”<sup>262</sup>

254. Despite criticisms, many witnesses felt that there was a value in having a test. Professor Randall Hansen felt that people naturalising “should have a sense ... of how life in the UK works, such as how the institutions operate and what you do”.<sup>263</sup> Professor Gareth Davies said, “I understand the tests as largely symbolic. If you wish to become a citizen, you should be prepared to make a certain effort.”<sup>264</sup>
255. Mike Tapp MP felt that the test is “a way of demonstrating understanding of the country”.<sup>265</sup> On the subject of questions with limited application to life in the UK, he did not disagree when questioned whether there was any relevance to knowing the height of the London Eye. The Minister then stated that he would take a “keen interest” in making sure the test is right when the test contract was out for tender in 2027.<sup>266</sup> A subsequent letter from the Home Office confirmed that test questions could be changed prior to this.<sup>267</sup>
256. Some witnesses called for an alternative option to the test, such as a course, particularly for those with access requirements such as limited literacy or limited prior education. Professor Thom Brooks told us that he felt this would be a positive option and had been mooted before in Sir Bernard Crick’s original report on the Life in the UK test in 2004.<sup>268</sup> Dr Anna Tuckett felt that courses “could be outsourced to NGOs, school, colleges or libraries”.<sup>269</sup> Mike Tapp MP said that he encourages “private companies running courses” but that the Government had finite resources to do so.<sup>270</sup>
257. **The Committee is dismayed that almost four years on from its original letter to the Government, the Life in the UK test remains unreformed and therefore unfit for purpose. The Committee does not believe in scrapping the test—indeed, it views it as an important step on the process to ILR and citizenship—but it urgently needs reform.**
258. **There is no need to wait until the contract for the Life in the UK Test expires in 2027 to make much needed changes to the content of the questions.**
259. *The Committee views the Life in the UK test as a woefully imperfect tool that inevitably cannot truly assess a person’s commitment to this country. However, we reiterate the recommendations from our 2022 letter. The Home Office should refocus the test on British values and practical aspects of living in the UK, and the test should not be multiple choice. Instead, it should involve more open-ended questions that more accurately demonstrate knowledge and engagement with life in the UK. Alongside reforms to the test, the Home Office should introduce courses which can be completed as an alternative to the test, that facilitate the learning and absorption of*

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262 Written evidence from Hibiscus Initiatives ([SCI0488](#)); see also [Q 66](#) (Professor Ricky van Oers).

263 [Q 58](#) (Professor Randall Hansen)

264 [Q 66](#) (Professor Gareth Davies)

265 [Q 170](#) (Mike Tapp MP)

266 *Ibid.*

267 Correspondence, *Minister Tapp to Chair of the Justice and Home Affairs Committee*, 24 March 2026

268 [Q 86](#) (Professor Thom Brooks)

269 Written evidence from Dr Anna Tuckett ([SCI0369](#))

270 [Q 170](#) (Mike Tapp MP)

***British culture and values. Assessment for these courses should be based on the course providers' judgement of whether the individual has engaged with the course appropriately, and be similar in style and delivery to the driving speed awareness course.***

### **The value of citizenship to the individual and the state**

260. As outlined at the start of this chapter, there are a number of advantages to obtaining citizenship rather than remaining on ILR. Many of the submissions we received from those with lived experience highlighted citizenship as fostering belonging and providing long-term security. They valued that citizenship is also not subject to the possible policy changes that can apply to ILR. Submissions noted that citizenship also provides greater flexibility and freedoms in terms of the ability to bring families together, enable democratic participation, and in terms of work, travelling for work or working abroad.<sup>271</sup>
261. Zoe Bantleman told us “many people will be giving up their other citizenship in order to take on British citizenship”, adding that that is “a huge sign of allegiance and their willingness to remain in this country”.<sup>272</sup>
262. However, others argued that citizenship could be more defensive. Professor Elspeth Guild stated that individuals “get very interested in citizenship” when they are “anxious that the entitlements of ILR and the access to equal treatment are going to be diminished along with the capacity to participate in society without endless questioning of your status”.<sup>273</sup> She noted that “very few EU nationals” applied for citizenship pre-Brexit, “except the Bulgarians and Romanians” whom she argued felt citizenship “was going to be an important way to diminish discrimination against them”.<sup>274</sup> Talent Beyond Boundaries told us:
- “Citizenship provides the highest form of protection and certainty, particularly for people with a displacement background who cannot safely return to a country of nationality or origin. For refugees and displaced talent contributing through skilled work, a credible route to citizenship via timely settlement, is not a reward but a safeguard. Citizenship in this case underpins integration, employer confidence, and the long-term legitimacy of the UK’s immigration system.”<sup>275</sup>
263. The Committee heard little evidence that the Government sufficiently values and promotes citizenship. Bindmans LLP said: “We do not have experience of the Government, or any government, promoting citizenship.” They argued that public debate on citizenship is “often negative: i.e. commentary on those who are deemed not to be ‘worthy’ of British citizenship”.<sup>276</sup> Echoing this, the Project for the Registration of Children as British Citizens and Amnesty International felt that poor promotion of citizenship resulted in some who are eligible for citizenship, being unaware of it.<sup>277</sup>

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271 See Appendix 5.

272 [Q 39](#) (Zoe Bantleman)

273 [Q 47](#) (Professor Elspeth Guild)

274 [Q 46](#) (Professor Elspeth Guild)

275 Written evidence from Talent Beyond Boundaries ([SCI0502](#))

276 Written evidence from Bindmans LLP ([SCI0348](#))

277 Written evidence from the Project for the Registration of Children as British Citizens and Amnesty International ([SCI0399](#))

264. The Minister for Migration and Citizenship, Mike Tapp MP, told us that with regards to citizenship, he does “nothing specific to promote it”, and that in his view “it is the decision of the individual to make that choice” on whether to become a citizen or not.<sup>278</sup> We note that the Social Cohesion Strategy is rather more positive and states that the Government will mandate citizenship is taught in both primary and secondary schools, though this is clearly within the remit of the Department for Education as opposed to the Home Office.<sup>279</sup>
265. One area the Committee examined in relation to citizenship promotion was that of citizenship ceremonies. Dr Marianela Barrios Aquino was against ceremonies, saying the individual’s “experiences in this country were devalued in ceremonies, where they were ‘welcomed’ into a community they had long been part of and contributed to”.<sup>280</sup> Others called for a strengthening of ceremonies.<sup>281</sup> Professor Thom Brooks, a naturalised British citizen born in America, told us:
- “In the United States, having a citizenship ceremony is not something hidden. It is not for everyone and does not happen all the time, but it does happen that you will be at a big sporting event—baseball, American football and other things—and you will get folks on the pitch who will swear allegiance, take their oath and become citizens right there with tens of thousands of people on their feet cheering them on. I got my citizenship in a back room in Gateshead.”<sup>282</sup>
266. **Obtaining British citizenship is a significant commitment to life in the UK and is cherished by many of those who have obtained it. Whilst we acknowledge that there may be many valid reasons for not wanting to obtain citizenship and instead remain on ILR, we believe that citizenship should be the end goal for the majority of individuals who settle in the UK.**
267. **The Government does not sufficiently value citizenship, and it is concerning that the Minister for Citizenship takes no specific action to promote citizenship. Placing greater value on citizenship is important both in encouraging long term migrant residents who have chosen to settle here to obtain citizenship, in many cases becoming active political participants in the UK, and in encouraging pride in citizenship amongst people who have always been British citizens.**
268. *We believe it is the job of a responsible Government to promote citizenship, and the Government should do much more to this end. While we welcome the Government’s commitment to mandate citizenship education, citizenship education should include how to obtain citizenship by registration, and the rights associated with it. As part of work to promote citizenship, the Home Office should take steps to give citizenship ceremonies a higher profile, with ceremonies taking place at more significant locations and with*

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278 [Q 157](#) (Mike Tapp MP)

279 Ministry of Housing, Communities & Local Government, *Protecting What Matters: Towards a more confident, cohesive, and resilient United Kingdom*, [CP 1540](#), April 2026

280 Written evidence from Dr Marianela Barrios Aquino ([SCI0532](#))

281 Written evidence from the Arts and Humanities Research Council Connecting Solidarities project ([SCI0601](#)) and Hleb Buziuk ([SCI0078](#))

282 [Q 87](#) (Professor Thom Brooks)

*greater involvement of the wider community, such as at cultural or sporting events.*

### Deprivation of Citizenship Orders

269. Perhaps the starkest example of the state’s view of citizenship comes in its use of and legislation for Deprivation of Citizenship Orders. It is both uncontroversial and right that the Home Secretary should have the power to remove citizenship that was obtained by fraud. Prior to 2006, the Home Secretary had the power to take away a person’s citizenship if they considered a person to have acted in a way “seriously prejudicial to the vital interests of the UK or a British overseas territory.”<sup>283</sup> However, since 2006, the criterion was widened to include the power to take away a person’s British citizenship if the Home Secretary consider it “conducive to the public good”.<sup>284</sup> As the Independent Commission on UK Counter-Terrorism Law, Policy, and Practice told us,

“Historically, citizenship deprivation was a narrow and rarely used power, subject to clear legal and procedural limits. Since 2002, successive legislative changes have expanded executive discretion, lowered legal thresholds, reduced procedural safeguards, and widened the scope of those affected.”<sup>285</sup>

270. The Committee heard that the use of these orders has increased in recent years. Liberty told us that, in the period since 2010, “deprivations orders were served more frequently than at any point in British history”. They noted that between 2010 and 2025, more than 200 individuals saw their citizenship removed, including 104 in 2017 alone, “making the UK the country with the third highest number of deprivations in this period, behind only Bahrain and Nicaragua”.<sup>286</sup>

271. We also heard how the UK’s use compared internationally. According to the Independent Commission on UK Counter-Terrorism Law, Policy, and Practice, citizenship cannot be revoked in Canada and the USA “other than for fraud or misrepresentation in acquiring citizenship” while French-born individuals “are permanently protected from citizenship revocation ... For naturalised French citizens, the power to revoke citizenship is subject to limitations and becomes unavailable after a specified period.”<sup>287</sup>

272. The use of deprivation orders “for the public good” drew concerns from a number of our witnesses.<sup>288</sup> Migrant Voice told us that this risked “creating a precedent for future governments to expand these issues to deprive citizenship from migrants for whatever purpose they decide”.<sup>289</sup> The Central England Law Centre argued that a “hierarchy of citizenship has been created and

283 British Nationality Act 1981 [section 40\(B\)](#), as substituted by the Nationality, Immigration and Asylum Act 2002, [section 4](#)

284 British Nationality Act 1981, [section 40](#); see also House of Commons Library, [Deprivation of British citizenship and withdrawal of passports](#) for further information on the legal grounding of Deprivation of Citizenship Orders.

285 Written evidence from the Independent Commission on UK Counter Terrorism Law, Policy, and Practice ([SCI0477](#))

286 Written evidence from Liberty ([SCI0492](#))

287 Written evidence from the Independent Commission on UK Counter Terrorism Law, Policy, and Practice ([SCI0477](#))

288 Written evidence from Praxis and the Runnymede Trust ([SCI0474](#)) and Amnesty International UK ([SCI0403](#))

289 Written evidence from Migrant Voice ([SCI0375](#))

an element of conditionality introduced” as people who may be eligible for other citizenships “are more at risk of having their nationality stripped”.<sup>290</sup>

273. We heard how notable cases, such as that of Shamima Begum, affected how many people felt about their citizenship. The Institute on Statelessness and Inclusion stated that Shamima Begum’s case has “compounded existing fears about the constantly changing nature of immigration laws and what was seen as the untrustworthiness of politicians in relation to those from migrant communities”. They shared comments from their service users, including Charles, a Windrush Victim, who said, “Government can change their views on a sixpence” while Debo, an individual who after 20 years in the UK secured citizenship in 2022, said “The law can change any time. History is showing me you can’t trust the government.”<sup>291</sup>

274. Liberty told us:

“the courts have determined that foreign citizenship is de jure rather than de facto for the purposes of deprivation. This means that both British-born and naturalised citizens can be deprived of their British citizenship so long as they can technically claim citizenship elsewhere, regardless of whether that country uses its discretion to recognise them as a citizen. This has effectively led to the Home Secretary rendering British citizens de facto stateless.”<sup>292</sup>

275. On Deprivation of Citizenship Orders, Professor Gareth Davies said:

“It is totally understandable. I do not find it morally objectionable to take nationality away from someone who has shown themselves fundamentally opposed to a country in a dramatic way—with some ifs and buts as to whether they are a minor and so on—but I am not entirely sure whether it is responsible and leads to a better world”.<sup>293</sup>

276. Some witnesses felt that whilst the powers were noteworthy, the issue was more academic than practical. Professor Christian Joppke said the powers are “symbolic politics and not a matter for the empirical world.”<sup>294</sup> Professor Thom Brooks told us that deprivation of citizenship was an “exceptional measure” and that “for the vast majority of British citizens, including those who acquire citizenship through naturalisation, citizenship remains secure”.<sup>295</sup>

277. The Independent Reviewer of Terrorism Legislation published a report in 2016 on Citizenship Removal resulting in statelessness.<sup>296</sup> It should be highlighted that the power to remove citizenship resulting in statelessness has never been used. It was intended that subsequent reviews would be produced at three-year intervals. The Home Office has pointed to the work of The Independent Chief Inspector of Borders and Immigration (ICIBI) in reviewing deprivation of citizenship orders more generally. However, these

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290 Written evidence from the Central England Law Centre ([SCI0394](#))

291 Written evidence by The Institute on Statelessness and Inclusion, Impact Law for Social Justice ([SCI0496](#))

292 Written evidence from Liberty ([SCI0492](#))

293 [Q 76](#) (Professor Gareth Davies)

294 [Q 76](#) (Professor Christian Joppke)

295 Supplementary written evidence from Professor Thom Brooks ([SCI0607](#))

296 Independent Reviewer of Terrorism Legislation, *Citizenship removal resulting in statelessness*, April 2016

inspections (in 2018 and 2024) are procedural and do not cover justification and rationale.<sup>297</sup>

278. **The Committee recognises the need for and value of Deprivation of Citizenship Orders to deal with the most severe of cases. However, we are concerned that the “public good” condition is too vague, which lends itself to future misuse and abuse.**
279. *The Government should expand the powers of the Independent Reviewer of Terrorism Legislation to review the exercise of all deprivations of citizenship with a justification that the deprivation is conducive to the public good.*
280. *The Committee echoes the recommendation of the Independent Commission on UK Counter-Terrorism Law, Policy, and Practice that the ‘conducive to the public good’ test should be replaced with a test relating directly to acts or conduct that is seriously prejudicial to the vital interest of the United Kingdom, any of the Islands or any British Overseas territory.*

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297 Independent Chief Inspector of Borders and Immigration, *An inspection of the review and removal of immigration, refugee and citizenship “status” (April - August 2017)*, January 2018 and Independent Chief Inspector of Borders and Immigration, *An inspection of the use of deprivation of citizenship by the Status Review Unit (April - June 2023)*, February 2024

## CHAPTER 7: THE ROLE OF THE HOME OFFICE AND CROSS-DEPARTMENTAL ISSUES

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281. Immigration, settlement and citizenship policy is a matter for the Home Office, although it inevitably touches on multiple departments. Over the course of the inquiry, we heard a range of views on how the Home Office handles these issues. Whilst it was clear that some good practice exists, the picture painted was generally one of a department that is asked to do too much and does not have the capacity or capability to effectively manage the system as it is today, let alone as proposed reforms intend it to be. In this chapter, we outline issues around responsibility for settlement, citizenship, and integration matters, the interaction between the Home Office and other departments, the interaction between central and local Government, and concerns around a lack of data led decision making.

### Capacity and capability at the Home Office

282. We have received much evidence questioning the capacity and capability of the Home Office, not only to manage its existing workload, but also to manage the increased demand the Government's proposed reforms would create.

283. It is worth noting that a significant amount of evidence received by the Committee came before the announcement of changes to asylum rules which will result in refugees having to reapply every 30 months (2.5 years). Whilst respondents talked of proposed hypotheticals, we now know this will be a lived reality.

284. Many witnesses felt that the Home Office was already struggling to manage its existing caseload. The3million told us:

“There are still cases that applied for the [EU Settlement Scheme] on time, on or before June 2021, who have been waiting for four and a half years for an application decision. According to the June 2025 statistics people who are part of the pre-deadline backlog include 9,151 people.”<sup>298</sup>

285. The Refugee and Migrant Centre told us that “decisions on relatively straightforward [humanitarian visa] extensions often take more than 12 months”.<sup>299</sup> The Helen Bamber Foundation told us that over a quarter of asylum cases had been waiting for an initial decision for over a year.<sup>300</sup>

286. This performance has a direct impact on migrants. The Central England Law Centre told us that “existing delays in Home Office decision-making mean that people who submit an application only days after the deadline can then wait over a year to be granted further leave and may be treated as having overstayed”.<sup>301</sup>

287. Given the reported existing struggles, it is unsurprising that many witnesses felt that the Home Office was not equipped to handle a potentially vast increase in workload. The Central England Law Centre felt it “unlikely that the Home Office could cope with the vastly increased number and

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298 Written evidence from the3million (SCI0456)

299 Written evidence from the Refugee and Migrant Centre (SCI0499)

300 Written evidence from the Helen Bamber Foundation (SCI0429)

301 Written evidence from the Central England Law Centre (SCI0394)

complexity of applications”.<sup>302</sup> Amnesty International UK framed the issue more generally, saying that “a failure of successive Governments over several Parliaments and decades is to require more from the Home Office, including in (sometimes even in response to) circumstances where it is already struggling with existing workload”.<sup>303</sup>

288. Witnesses highlighted the finite resources available for casework. Richard Baynham of the National Audit Office (NAO) told us: “Over the period of 2021–24 there was a reduction of around a third in the number of compliance officers. That limits the ability to engage and explore the sector.”<sup>304</sup> Alp Mehmet, himself a former Immigration Officer, told us that there is no mechanism to manage the changes, the resources are not there, and “at the ground level, the training and capacity are not there to initiate the first part of the decision-making process”.<sup>305</sup>

289. When questioned on Home Office performance, Dan Hobbs, the Director General for the Migration and Borders Group at the Home Office argued that performance was improving:

“67% of asylum claims are now receiving an initial decision within six months ... productivity is going up and the case load in the asylum system is coming down very dramatically.”<sup>306</sup>

290. However, the NAO expressed concern that this moved problems in the asylum system. Tim Phillips told us that the Home Office had been very focused in recent years on getting the initial asylum decision backlog to decrease, but

“the problem with that in any system—it is the same problem if you suddenly turn off the tap—is that the administrative people reorientate themselves on the thing you have told them to go and do, but work flows to the next stage and suddenly the backlog you have moved moves forward to the next stage [referring to the asylum appeals backlog]”.<sup>307</sup>

In their report on the asylum system, the NAO identified that a “key factor that stops the system from operating as intended is the inability to promptly remove some people who have exhausted their appeal rights but do not leave voluntarily.”<sup>308</sup>

291. Regarding Home Office capacity, the Minister for Migration and Citizenship, Mike Tapp MP said that “Home Office staffing will, of course, be considered in this.”<sup>309</sup> Dan Hobbs, the Director General for the Migration and Borders Group at the Home Office indicated that if anything, staffing numbers would go down. “The spending review sees the Home Office allocation reduced. The assumption, in line with wider government reforms, is that the Home Office will reduce.”<sup>310</sup> Both the Minister and the Director General pointed

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302 Written evidence from the Central England Law Centre ([SCI0394](#)); see also written evidence from Hleb Buziuk ([SCI0078](#)).

303 Written evidence from Amnesty International UK ([SCI0403](#))

304 [Q 132](#) (Richard Baynham)

305 [Q 91](#) (Alp Mehmet)

306 [Q 163](#) (Dan Hobbs)

307 [Q 146](#) (Tim Phillips)

308 National Audit Office, *An analysis of the asylum system*, December 2025

309 [Q 164](#) (Mike Tapp MP)

310 [Q 164](#) (Dan Hobbs)

to modernisation and efficiency improvements in the Home Office which they predicted would mitigate the need for staffing additions in some areas.<sup>311</sup>

292. It was not just staff numbers that concerned our witnesses, but their experience. Tim Phillips highlighted the attrition rate amongst caseworkers.

“It was 35%, I think, in 2024. It then also takes seven months for a [new] caseworker to be fully operational and able to handle whatever is thrown at them. You can see how, even if you are not telling people to rush, just the fact that you have that turnover and you have so many green recruits could drive a culture in which you get suboptimal outcomes.”<sup>312</sup>

293. The IfG’s Shaina Sangha told us that whereas in previous decades more Senior Executive Officer (SEO) and Higher Executive Officer (HEO)<sup>313</sup> grade roles made the majority of initial casework decisions, now “the majority of these roles are filled by executive officers, which are very junior and the pay and morale are very poor”.<sup>314</sup>

294. Witnesses feared that a combination of insufficient, inexperienced staff faced with an overwhelming workload would lead to mistakes and major failings. Bindmans LLP told us that there is a “risk of inconsistent decision making, leading to an increase in appeals and judicial reviews, with resultant costs to both the applicant and the public purse”.<sup>315</sup> Migrant Voice went further in their concerns, noting that the Windrush Commissioner had warned that “these [policy] changes are liable to increase the risks of similar situations to the Windrush scandal happening again in the future.”<sup>316</sup>

295. One proposed solution came from the Islington Law Centre. They criticised the fact that applicants had to “effectively ‘re-present’ their immigration history in full” each time they reapplied for visa extensions and argued that as the Home Office already has this information, applicants should instead be able to communicate changes in circumstance which “should result in the leave being quickly reissued”.<sup>317</sup>

296. The NAO also called for detailed reviews and assessments of impacts of immigration changes to the whole system. Tim Phillips called for this to look at “the system from end to end for people working in the Home Office on cases, through to the Ministry of Justice ... and also through to local authorities”.<sup>318</sup> Supporting this, Richard Baynham called for the Government to “invest more in understanding how your system is working and how your route is operating. Is your route operating as you intended it to operate? Are there unintended consequences from the way it is operating? Are there increased risks in compliance and response?”<sup>319</sup>

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311 [Q 164](#) (Mike Tapp MP and Dan Hobbs)

312 [Q 147](#) (Tim Phillips)

313 SEO and HEO roles are middle management roles within the Civil Service. Equivalent roles outside the Civil Service would be senior team leader (SEO) and team leader (HEO). They often manage teams of administrative staff. See Civil Service Careers, [Civil Service grades and pay](#) for further details.

314 [Q 93](#) (Shaina Sangha)

315 Written evidence from Bindmans LLP ([SCI0348](#))

316 Written evidence from Migrant Voice ([SCI0375](#))

317 Written evidence from Islington Law Centre ([SCI0503](#))

318 [Q 151](#) (Tim Phillips)

319 [Q 151](#) (Richard Baynham)

297. When asked about additional work generated by changes such as reviews of refugee status every 30 months, the Director General argued that refugee status review:

“is not about re-looking at the whole asylum claim; it is about whether the country situation for that individual, on the basis of their claim, is now safe or has changed. It is not about revisiting the whole decision; it is about doing an assessment”.<sup>320</sup>

He went on to state that “how much resource it takes, will depend on the individual cases, the nationalities that flow through ... and world situations”.<sup>321</sup>

298. The Secondary Legislation Scrutiny Committee, in their March 2026 report on the Statement of Changes to the Immigration Rules found that “The Home Office should have provided estimates of the additional workload and how it would be resourced alongside this Statement.”<sup>322</sup>
299. **Due to policy decisions by successive governments, the Home Office is struggling to manage the immigration, settlement, and citizenship system as it currently stands. Increasing the volume and complexity of applications—notwithstanding potential modernisation and efficiency improvements—will only exacerbate this issue. Morale amongst caseworkers is low, and adding whole swathes of repeat checks alongside spending review staff reductions will further exacerbate the situation, and increase their workload and stress.**
300. *We are not convinced the Home Office will be able to deliver the proposed new system without additional staffing, and regret the lack of availability of a public staffing impact assessment. The Home Office should assess how changes to visa policy will affect caseworkers’ workloads, and following this implement a national recruitment drive for immigration caseworkers to ensure there is adequate capacity to address increased demand. Alongside this, the Home Office should improve support for current and new caseworkers to reduce attrition rates and appeal rates. A greater proportion of immigration caseworkers should sit at the position at least of Higher Executive Officer, with the pay band and responsibility of that grade reflecting the importance and impact of the work that they do, as well as the challenging circumstances in which they do it.*
301. *Alongside this internal review, there should also be an independent, comprehensive assessment of the immigration and settlement system, with a particular focus on Home Office operations. This external review should examine staffing structures, operational processes, and the strategic use of technology to ensure the system is effective, efficient, and fit for purpose.*
302. *Extension applications should be streamlined and simplified. There is no need to force caseworkers and applicants repeatedly to trawl through vast amounts of documentation to submit or approve applications. This would reduce the burden on both migrants and*

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320 [Q 163](#) (Dan Hobbs)

321 [Q 164](#) (Dan Hobbs)

322 Secondary Legislation Scrutiny Committee, *Fifty Sixth Report* (56th Report, Session 2024–26, HL Paper 282)

*caseworkers, with only recent relevant changes of circumstance needing to be submitted.*

### **Reactivity and lack of forward planning**

303. Sunder Katwala told us:

“Immigration policy often is reactive to events ... The primary debates are: who do we let in? Who gets a visa? Who gets to come? How do they come? What number should we be letting in? That can crowd out the debate about what we think should happen 12 months, three years, five years and six years later.”<sup>323</sup>

304. Professor Randall Hansen believed that decisions were driven by more party-political concerns, noting that “The Home Office has been quite explicit that we have to prevent the worst, and the worst is Reform coming to power.”<sup>324</sup>

305. Professor Thom Brooks said that successive governments, going back to before the 2000s, had responded to issues heightened by the media, resulting in a “rapid succession of changes of rules, laws and other things that have made the immigration system complex”.<sup>325</sup> He called for government to be “more on the front foot”.<sup>326</sup>

306. The Secondary Legislation Scrutiny Committee, responding to changes to Immigration Rules (HC 1691) described the approach to implementation and information provision as “piecemeal” which “hinders scrutiny”.<sup>327</sup>

307. **Under successive Governments with differing policies, the Home Office has been too reactive on immigration issues, responding to headlines and short-term political pressures, rather than taking a long-term and holistic approach. This is compounded by data issues that run across many areas of the migration system. The result is migration and settlement policy that is not carefully thought through, long-termist, or comprehensive.**

### *Absence of impact assessments*

308. Speaking on the changes to asylum and settlement proposed in 2025, the Refugee Council noted that no impact assessments were published.<sup>328</sup> The Work Rights Centre called the consultation “procedurally flawed” and called for impact assessments to be published on the business and economy, as well as on any discriminatory and disproportionate effects on minority groups.<sup>329</sup>

309. Whilst the Government regularly publishes impact assessments for implemented policies, it does not regularly publish them ahead of proposed policy changes. Speaking to the Committee, former Home Office Chief Statistician Jon Simmons said that “a published impact assessment on the impact of policies as a routine part of policy, is a reasonable expectation that we should have”.<sup>330</sup> However, he stated that while there were many

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323 [Q 2](#) (Sunder Katwala)

324 [Q 56](#) (Randall Hansen)

325 [Q 82](#) (Professor Thom Brooks)

326 *Ibid.*

327 Secondary Legislation Scrutiny Committee, *Fifty Sixth Report* (56th Report, Session 2024–26, HL Paper 282)

328 Written evidence from the Refugee Council ([SCI0400](#))

329 Written evidence from the Work Rights Centre ([SCI0413](#))

330 [Q 141](#) (Jon Simmons)

examples where impact assessments had been completed, there were also many examples where they had not. He called for more consistency in the impact assessment process.<sup>331</sup>

310. Tim Phillips of the NAO also called for the publication of impact assessments for policy changes, “so that the public can understand what the Home Office believes the modelled future will be if a policy comes into place”.<sup>332</sup> He cited the significantly higher than anticipated numbers obtaining skilled worker visas in 2020 as an example of what happens when you fail to conduct proper impact assessments, noting that the Government had assumed “that 360,000 people were using it. It ended up being used by 930,000”.<sup>333</sup>
311. However, Mary Gregory, Executive Director of Population, Census, and Social Statistics at the Office for National Statistics, told us that the data are not always there at the Home Office to conduct proper analysis, and noted that “if you are the Home Office, your primary purpose is to deliver operations, not produce statistics.”<sup>334</sup> We explore wider data issues in Chapters 1 and 2.
312. The Secondary Legislation Scrutiny Committee, in their March 2026 report on the Statement of Changes to the Immigration Rules found that
- “impacts are only being assessed ‘iteratively’, and that the IA [Impact Assessment] will only be published at a later stage, makes these changes impossible to scrutinise fully. This is a matter of concern and we encourage the Home Office to consider whether more impact information can be provided during the iterative phase.”<sup>335</sup>
313. The Minister for Migration and Citizenship, Mike Tapp MP, repeatedly told us that “Impact Assessments should be published when decisions are made” adding “I think we are in the right place in producing an impact assessment when a decision is made because, before that, you are still assessing and analysing that impact, and a consultation should be a part of that.”<sup>336</sup> Dan Hobbs, Director General at the Home Office, said that “the earned settlement paper also included a significant chapter around data on what was happening on flows and predictions around contributions and settlement.”<sup>337</sup>
314. The Committee acknowledges that the Earned Settlement paper and consultation were accompanied with data on flows and predicted impact on numbers. They were not however, accompanied by models on predicted impact on the national infrastructure, which the minister told us was the rationale behind applying these rules retrospectively.<sup>338</sup>
315. **The Home Office approach to Impact Assessments is inconsistent. It is not always clear that Impact Assessments have been completed, and even when they have been they are not routinely published.**

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331 *Ibid.*

332 [Q 135](#) (Tim Phillips)

333 *Ibid.*

334 [Q 123](#) (Mary Gregory)

335 Secondary Legislation Scrutiny Committee, *Fifty Sixth Report* (56th Report, Session 2024–26, HL Paper 282)

336 [Q 161](#) (Mike Tapp MP)

337 [Q 161](#) (Dan Hobbs)

338 [Q 153](#) (Mike Tapp MP)

316. *It is unhelpful that a full impact assessment was not published during the consultation process for the Government's earned settlement proposals. In the absence of that impact assessment, the Government should publish an impact assessment when the decision on the earned settlement policy is made but before implementation, alongside the required primary and/or secondary legislation.*
317. *Any major policy proposal, including but not limited to White Papers, should be published with a full Impact Assessment, to enable both those within Government, and those outside of Government, to fully assess what effect proposed changes will have; and the Government should publish revised impact assessments in light of changes following consultations. This will enable Governments to be held accountable for policies that fail to meet their own ambitions and the public to more meaningfully engage with consultations.*

### Responsibility

318. Primary responsibility for settlement and citizenship sit within the Home Office, whilst coordination of integration (or at least, social cohesion) in England sits within the Ministry of Housing, Communities and Local Government. Integration is devolved in the four nations of the UK, and within England is largely the responsibility of local councils. Alongside this, many other government departments have a role to play—such as the Department for Work and Pensions, Department for Business and Trade, Department of Health and Social Care and the Department for Education.
319. Ministerial responsibility for settlement, citizenship and integration is split across the Home Office and MCHLG. In the Home Office:
- The Parliamentary Under-Secretary of State (Minister for Migration and Citizenship), Mike Tapp MP, is responsible for: Immigration Rules; earned settlement and citizenship reform; nationality; and oversight of existing safe routes schemes.<sup>339</sup>
  - The Minister for Border Security and Asylum, Alex Norris MP, is responsible (amongst others) for: Immigration White Paper implementation; asylum; illegal migration; reducing net migration; and legal migration policy.<sup>340</sup>
  - The Parliamentary Under-Secretary of State (Minister for Devolution, Faith and Communities) in MHCLG, Nesil Caliskan MP, is responsible for communities and social cohesion.<sup>341</sup>
320. Many witnesses have also noted the need for the Home Office's to work effectively with other Government departments. The need was described succinctly by Alp Mehmet:
- “Whichever way you look at it, if you have a net 4.5 million people arriving in 12 or 13 years and 2.5 million arriving in the last four years

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339 Home Office, [Parliamentary Under-Secretary of State \(Minister for Migration and Citizenship\)](#) [accessed 12 May 2026]

340 Home Office, [Minister of State \(Minister for Border Security and Asylum\)](#) [accessed 12 May 2026]

341 Ministry of Housing, Communities and Local Government, [Parliamentary Under-Secretary of State \(Minister for Devolution, Faith and Communities\)](#) [accessed 12 May 2026]

added to our population, the implications for housing, the NHS and GP surgeries are phenomenal.”<sup>342</sup>

Richard Baynham of the NAO told us: “We found that there was not enough collaboration between the Home Office and relevant departments to understand the potential consequences and impacts.”<sup>343</sup>

321. Shaina Sangha of the IfG said that “the Home Office is just trying to get the number down and is frequently in conflict with the priorities of other departments”.<sup>344</sup> David Goodhart spoke similarly, saying:

“Most government departments have a vested interest in the most open possible border, whether it is Education, which wants higher education ... part-funded by international students, or Health, which wants more people coming in to do social care.”<sup>345</sup>

322. Zoe Bantleman called for “a cross-government approach to both immigration and welfare”, citing concerns that proposed changes to settlement will lead to increased child poverty amongst migrant children.<sup>346</sup>

323. One key issue highlighted to the Committee as preventing better cross-government working was the distribution of policy responsibilities across the UK. Immigration and citizenship policy is reserved to the UK Government, while integration policy is largely a matter for the devolved administrations of Scotland, Wales and Northern Ireland, and for devolved local authorities in England. As The Coalition for Language Education told us, “this results in major local differences”.<sup>347</sup>

324. One suggestion we received from Shaina Sangha was an immigration plan. This would be co-owned by the Home Office and the Cabinet Office and would be akin to “a spending review for immigration”. She felt this would be a way of “focusing minds across Government”.<sup>348</sup> Dr Madeleine Sumption suggested having “a moment” where the Government sets out its desired migration levels, actions to achieve this and trade-offs, which would mean “we would have a more strategic immigration policy”.<sup>349</sup>

325. Dr Sumption cautioned, however, that there was immense difficulty in accurately predicting how many people will come. She warned that incorrect predictions could lead to trust in Government being eroded, or further “lurches” in policy.<sup>350</sup> She suggested that a strategy could say “something about numbers” but should “be more about laying out an overall strategy or vision”.<sup>351</sup>

326. The Committee also heard about the work of the Migration Impacts Forum (MIF), set up alongside the Migration Advisory Committee (MAC) in 2007 and disbanded in 2010.

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342 [Q 104](#) (Alp Mehmet)

343 [Q 141](#) (Richard Baynham)

344 [Q 91](#) (Shaina Sangha)

345 [Q 93](#) (David Goodhart)

346 [Q 23](#) (Zoe Bantleman)

347 Written evidence from The Coalition for Language Education ([SCI0393](#))

348 [Q 91](#) (Shaina Sangha)

349 [Q 110](#) (Dr Madeleine Sumption)

350 *Ibid.*

351 *Ibid.*

327. Professor Thom Brooks told us that the MIF had answered to both the Home Office and the Ministry of Housing, Communities and Local Government: “It had a co-chair from both and, in effect, a community cohesion piece”. Alongside this, the MIF had representatives from local councils, devolved governments, local NHS trusts, and others, who were brought together to work through issues relating to the impact of migration. He went on to say that the MAC now has this remit but does not look at issues in the same way.<sup>352</sup> Dr Madeleine Sumption, deputy chair of the MAC, acknowledged that the MIF “was able to look in more detail at the specific pressures that might emerge in individual public services. The MAC does not tend to do that much.”<sup>353</sup>
328. The Committee was struck by Professor Brooks’ point on the disbandment of the MIF in 2010:
- “It is not a surprise to me that the big concerns that people often express about immigration, the numbers and other things, since that time are about the impact of migration in their local areas or areas that they read about or understand, and there has been nothing in its place, really.”<sup>354</sup>
329. Mike Tapp MP told us that reinstating the MIF (or similar body) was “not something that I have looked at” but went on to say that “there is a lot to consult on and that we have sufficient bodies to consult on”.<sup>355</sup>
330. **Immigration, settlement, citizenship, and integration sit across multiple departments, the devolved administrations and England’s regions in ways that few other issues do. The Home Office does not work sufficiently well with any of these key stakeholders in this area of shared responsibility. Responsibility amongst departments and ministers is at times both unaligned and overlapping. Where there are not clear roles and responsibilities, policy becomes confused, implementation becomes patchwork and inconsistent, and real people are negatively affected.**
331. *The Government should clarify ministerial responsibilities, particularly in light of the dramatic changes proposed in 2025 and 2026.*
332. **The Home Office responds to immigration and settlement issues primarily through the lens of net migration and labour market considerations. This fundamentally misses the issue that concerns public opinion, namely the impact of immigration and settlement on public services and their communities.**
333. *A Triennial Migration Plan, with progress updates annually, similar to the Spending review, should be introduced. The Plan should be co-owned by the Home Office and Cabinet Office, and should reflect the priorities of different Government departments, the devolved nations, and local government, as they relate to migration. This will provide clarity and reassurance to the public, alongside ensuring that different bodies work more closely together. This plan would be qualitative rather than quantitative, focusing on the principles*

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352 [Q 84](#) (Professor Thom Brooks)

353 [Q 109](#) (Dr Madeleine Sumption)

354 [Q 84](#) (Professor Thom Brooks)

355 [Q 169](#) (Mike Tapp MP)

*guiding the Government's migration and settlement decisions, and outlining predicted impacts of policy decisions rather than proposing a cap or estimate of numbers.*

334. *The Government should reintroduce the Migration Impacts Forum. This body would feed into the Migration Plan and would focus efforts on understanding the societal impacts of migration as opposed to the macroeconomic impacts.*

## SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

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### Introduction

1. The Home Office's migration statistics focus primarily on entry into the UK, whether via a visa or irregularly. While the Migration Journey dataset has some notable gaps in its coverage, it is a valuable resource for understanding how non-UK nationals move through the immigration system over time. However, despite recent improvements (and improvements to come such as the Transformed Labour Force Survey) the evidence base is significantly weaker regarding migrants' outcomes once in the UK, such as their employment status and use of public services. These gaps make it very challenging to make and analyse policy on migration and settlement. (Paragraph 47)
2. The Committee welcomes the introduction of the Transformed Labour survey and hope it will be swiftly implemented. (Paragraph 48)
3. We are concerned that exit check data has not been published by the Home Office since 2020. While previous data indicate that most visa holders depart before their leave expires, the Home Office cannot reliably determine the whereabouts of overstayers. As a result, enforcement activity is largely driven by risk and opportunity, rather than data. We deeply regret that the Government stopped publishing exit check data, and welcome the long overdue resumption of exit check statistics later this year. (Paragraph 49)
4. *The Home Office should resume the publication of exit check statistics as a matter of urgency, and certainly before the 2026 summer recess, with annual updates thereafter. If this has not happened, the Government should provide a statement to Parliament as to why not.* (Paragraph 50)
5. The most disturbing revelation of this inquiry is that we do not know which or how many migrants are in the UK. For large numbers of visa entrants we have no data to assure us whether they did in fact leave when they were meant to. This is a historical problem of data collection and includes an absence of departure records for migrants who have arrived or been due to leave the UK between 2021 and 2026, and is ongoing. This is simply not good enough and this data failure should be addressed as a matter of urgency. (Paragraph 51)
6. As a result of our findings, and despite the presence of high quality data in some areas, it is clear that major data gaps make it difficult for the Government to develop impact assessments, or for scrutiny bodies to assess the likely impact of government proposals. (Paragraph 52)

### Improving data

7. Linked administrative data can be used to support a greater understanding of outcomes for those who choose to come and live in this country, including how these individuals interact with the labour and housing markets, public services, and the criminal justice system. The Committee welcomes the progress that has been made towards creating a more joined-up data landscape using administrative data. The development of the Refugee Integration Outcomes study provides a clear example of this progress. (Paragraph 63)
8. However, old data systems without a consistent individual identifier and gaps in data collection when migrants use public services prevents a comprehensive understanding of their experiences. The absence of linked data and a lack of data sharing across different parts of government also prevents the timely

identification of their future demand for services and support, reducing the effectiveness of service planning and delivery. (Paragraph 64)

9. *The Home Office should take steps to improve, or introduce, two-way data sharing between the Home Office, enforcement agencies, sector regulators and relevant departments, to aid compliance efforts, to provide evidence for future policy development and to assist in impact assessments. (Paragraph 65)*
10. *The Government should seek to emulate a Scandinavian-style data collection system. Visa records should be routinely linked to other administrative data, such as HMRC payroll data and DWP Universal Credit claimant data. To support these linkages, each individual granting of a visa should be assigned an internal individual and consistent identifier, akin to that proposed in the Children's Wellbeing and Schools Act 2026 which would be included in the records for when these individuals interact with public services, the tax system, and the criminal justice system. All Departments should routinely capture and report this data concerning interaction with these service providers. (Paragraph 66)*
11. We are disappointed to learn that the ONS has halted its move towards a linked data system due to costs and a focus on short-term outcomes. (Paragraph 67)
12. *The ONS should resume work towards a more integrated administrative data system, so that migrants' outcomes in areas such as employment, benefits, housing, health and justice can be analysed more systematically. This would be supported by the introduction of an individual identifier issued alongside the granting of a visa. (Paragraph 68)*
13. The census is a valuable source of data and is hugely important in the allocation of financial resources at a local level. However, conducting an interim census—even with a 10% sample—would be costly, and it is unlikely to be completed within the next year. (Paragraph 74)
14. *We do not recommend conducting an interim census. Instead, we consider the systematic linkage of Home Office visa data with other administrative datasets to be a more effective long-term solution to data gaps between census years moving forward. The Government has shown it can effectively link data, as evidenced by the RIO dataset. This should be implemented as a priority. (Paragraph 75)*
15. We are concerned that the ONS is set to reduce the size of the Annual Population Survey in September this year, before the Transformed Labour Force Survey becomes fully operational, when there are already sizeable gaps in our understanding of the migrant population in the UK. (Paragraph 76)
16. *The Annual Population Survey sample should not be reduced until the Transformed Labour Force Survey is fully operational. This would mitigate the risk of further data gaps emerging if there are delays in developing the Transformed Labour Force Survey (Paragraph 77)*

### **Extending the route to settlement**

17. A baseline 10-year path to ILR for migrants with work and family visas would be more restrictive than equivalent routes in comparable high-income countries. Paths exceeding 10 years are far less common and would make the UK an outlier. (Paragraph 105)

18. Extending the qualifying time to ILR risks undermining integration by reducing affected migrants' security of status—this would limit their ability to make long-term employment, family, and housing decisions. In addition, the high cost of immigration application fees and the Immigration Health Surcharge for migrants risks increasing poverty among low-income migrants. In some cases, those who are unable to afford to renew their status may fall out of legal status, increasing the size of the unauthorised migrant population if they do not depart the UK. (Paragraph 111)
19. The Government's proposal of a 20-year settlement route for refugees with reviews of their refugee status every 2.5 years risks compromising integration and undermines opportunities for refugees to make long term decisions regarding work, family or other aspects of life. (Paragraph 112)
20. *We do not support the Government's proposals to extend the baseline qualifying time for Indefinite Leave to Remain to 10 years, to 15 years for those on work visas below RQF 6, and to 20 years for refugees on the core protection route. The Government should instead explore the option of retaining the 5 year baseline qualifying time for Indefinite Leave to Remain, while separating Indefinite Leave to Remain from access to public funds. Migrants with ILR could remain subject to the No Recourse to Public Funds condition until they have resided in the UK for 10 years and/or obtained British citizenship.* (Paragraph 113)

#### **Retrospective application of the new immigration rules**

21. Any retrospective change would be manifestly unfair—and may be unlawful—towards migrants, who have planned their lives around the current system and made significant long-term decisions, such as career, housing, and family life decisions with the expectation that they would be able to qualify for ILR under the current rules. This is egregious in the case of migrants on the Hong Kong BN(O) visa route, given that previous Government statements had assured BN(O)s that they would have a route to British citizenship without any such requirements. (Paragraph 129)
22. The UK's reputation would be adversely impacted by retrospective action, which will likely make the UK a less attractive destination for highly skilled migrants in the future. (Paragraph 130)
23. *Any changes to ILR rules should not apply retrospectively to individuals who are already on a qualifying route. While the Government may not support the previous Government's decision to open certain visa routes, that decision has already been made. Many migrants made significant long-term decisions with the expectation of acquiring ILR after five years.* (Paragraph 131)

#### **Earning settlement and citizenship, and promoting integration**

24. The Committee acknowledges that to a certain extent, settlement and citizenship have always been earned, in the case of the UK through current language, financial, and conduct requirements. Our concern is not with the concept of earning settlement—indeed this is a sensible and internationally implemented approach—but rather with the details of the Government's proposals. (Paragraph 136)
25. Eligibility for ILR should still (with appropriate exemptions) be dependent on meeting minimum requirements such as no criminal convictions, certain financial criteria, and English language proficiency. (Paragraph 137)

26. *The Government is exploring ways to combine reductions and additions to the settlement qualifying period. They should clarify how additions and reductions can be combined and what additions ‘taking precedence’ means. Combining additions and reductions should be done in a way that means people who are subject to additions are still incentivised to pursue desirable outcomes such as higher paid employment or greater language skills. (Paragraph 138)*
27. We do not understand the inclusion of ‘no current litigation’ in the minimum requirements, and seek clarification of what this means in this context. (Paragraph 141)
28. *The Government should clarify what it means by ‘no current litigation’ before applying it as a minimum requirement. (Paragraph 142)*
29. Notwithstanding some reservations, such as the apparent absence of urgency for the publication of an integration strategy, the Committee broadly welcomes the publication of *Protecting What Matters*. (Paragraph 144)
30. We welcome the Government’s actions extending the move-on period from 28 to 42 days, and believe this will better support refugees in obtaining work and integrating into communities. We note the evaluation published on 10 June. (Paragraph 150)
31. Work is a crucial enabler of integration. The Committee agrees wholeheartedly that “immigration works where immigrants work” and welcomes the Government’s focus on work as part of earned citizenship. However, such an approach risks excluding some groups, and may have a disproportionate impact on women and refugees. (Paragraph 159)
32. Employment outcomes for refugees are woeful, and women still see poorer work outcomes than men. This represents both a missed opportunity to benefit from their potential, and a huge burden on the state. Investing in employment training and opportunities for refugees and women early on will save the Government money in the long run through increased tax receipts and reduced welfare spending. (Paragraph 160)
33. *The Government should reintroduce employment schemes specifically targeting refugees, such as the Refugee Transitions Outcomes Fund (RTOF) and the Refugees Employability Programme (REP). Alongside this, the Government should explore how to improve employment support for migrant women, drawing on best practice from other targeted schemes. (Paragraph 161)*
34. The phrase immigration works where immigrant works goes both ways. While the Government must support migrants and refugees to access opportunities to work, migrants must take them. (Paragraph 162)
35. The Committee is alarmed at reports of visa sponsor abuse. This actively harms integration outcomes, exposing thousands to penury, preventing full participation in the labour market, delaying settlement, and ultimately stopping those tied to sponsors from integrating into British society. (Paragraph 163)
36. *The Committee supports the call to decouple visas from sponsors and tie them to sectors. To mitigate the risk to sponsors paying sponsorship fees, those switching companies would be required to pay back sponsorship costs, prorated over the year. (Paragraph 164)*

37. We would like to see further evidence that volunteering is as significantly beneficial to integration outcomes as the proposed 3–5-year reduction to the ILR baseline implies. We are also concerned at how volunteering will be assessed, alongside access to volunteering and the potential for exploitation. (Paragraph 165)
38. The individual income thresholds which earn a reduction in the qualifying time to ILR are not linked to migrants' net fiscal impact but instead are set at the higher and upper Income Tax rate thresholds. As a result, some migrants who are net contributors to the public finances would be required to wait 10 years to acquire ILR. Proposals should focus less on income, and more on making a positive contribution. (Paragraph 170)
39. *The income levels which lead to a reduction in ILR pathways should not be set according to Income Tax thresholds but should be set on the advice of the Migration Advisory Committee (MAC). It should be asked to consider the impact of migration on the public finances and the impact on regional labour markets when setting these thresholds.* (Paragraph 171)
40. *The Government should reassess, with advice from the MAC the income thresholds which lead to a reduction in settlement timelines, as well as the scale of these reductions. At the same time, they should explore other contributing reductions.* (Paragraph 172)
41. *We believe the Government should explore mechanisms whereby migrants with dependent visas should be able to qualify for ILR as the work visa holder if the income is sufficiently high that the household places no burden upon the state.* (Paragraph 173)
42. Learning English is a central pillar of integration, and the Committee supports the increased emphasis placed on English language skills in the Government's White Paper and Social Cohesion Strategy, in particular the raising of language thresholds. The Committee accepts that refugees and asylum seekers will not always have English language skills prior to entering the UK. However, it is reasonable to expect that the vast majority of those granted leave to remain, including dependents, learn English as soon as is practical. (Paragraph 191)
43. While policy and strategy are crucial for enabling those settling in the UK to learn English, this should not detract from it being incumbent on those settling in the UK to take steps to learn English. The Government must provide the opportunities for migrants to learn English, migrants must take them. (Paragraph 192)
44. Certain migrant groups, namely refugees, are unlikely to reach their full potential without adequate language and employment support. Yet English for Speakers of Other Languages courses are oversubscribed, and provision is uneven across the UK. (Paragraph 193)
45. The Government lacks an ESOL strategy, and access to ESOL provision is a postcode lottery. We welcome the review into language provision, which is long overdue. However, we are concerned that a commitment to publish conclusions will not result in a dedicated ESOL strategy. (Paragraph 194)
46. *The Government must increase ESOL provision so that supply meets demand and encourage migrants to utilise language courses. This should be delivered through a national strategy, to ensure that everyone has access to language provision. The*

*Government should take steps to include access to English for Speakers of Other Languages courses for people on the path to settlement. (Paragraph 195)*

47. While we broadly support the mandatory requirements proposed in the earned settlement Immigration White Paper, they are too rigid. Migrant dependants would be unable to acquire ILR if they were not working, even if the main applicant was making a very significant net positive fiscal contribution. Similarly, victims of trafficking and exploitation who had been coerced or compelled to commit criminal offences would also be unable to meet the mandatory requirement of having no criminal convictions, and people on maternity leave or with long term disabilities may face challenges to meet mandatory income requirements. (Paragraph 199)
48. *The Government should introduce exemptions which consider particularly vulnerable groups. Migrants on maternity leave and those with long-term illnesses or disabilities should be exempt from meeting the mandatory requirement of having an income of £12,570 for three to five years. This exemption should also cover unpaid carers. (Paragraph 200)*
49. The changes being proposed will have a significant impact on children, likely delaying settlement for many, with associated negative outcomes such as poverty, poor health, and reduced access to opportunities. The Committee does not feel it is fair to judge children by the decisions and actions of their parents. (Paragraph 207)
50. *We strongly support the recommendation of the Home Affairs Committee that children who arrive at a young age and grow up in the UK should usually be granted settled status by 18, and that children who arrive at a later age should have clear and accessible pathways to settlement. (Paragraph 208)*
51. The Committee notes with disappointment that no strategy for integration in England was written following the publication of Indicators for Integration. This was a missed opportunity. We welcome the commitment to develop an effective cross-government integration strategy but are concerned that the lack of date of publication means that the issue is being kicked into the long grass. (Paragraph 217)
52. *The Government should publish its integration strategy for England no later than the end of 2026. The Government has a useful base in the Indicators of Integration, which the Committee recommends informs this strategy. (Paragraph 218)*
53. The nature of earned settlement puts the onus on migrants to integrate. However, as acknowledged by the Government, integration is a two-way street. Those coming to the UK have to want to integrate, and both UK society and the Government have to facilitate that. Migrants choose to make the UK their home, and in so doing, create an expectation that they will integrate into society. However, the UK also chooses to admit them, and in so doing, creates a reciprocal expectation that conditions are created whereby integration is not only possible, but likely. (Paragraph 224)
54. *When developing its integration strategy, the Government must set clear and achievable measures and targets for migrant integration and provide them with the structures to do so. This will enable migrants to the UK to actively integrate into receiving societies. (Paragraph 225)*

### Settlement and citizenship

55. The Committee finds the farrago of immigration rules and legislation to be anathema to good governance. A system that confuses experts in the field is clearly systematically unworkable, and results in delay, additional cost, poor decision-making, and miscarriages of justice. (Paragraph 235)
56. *The Government must urgently simplify both the immigration rules and immigration legislation, fully implementing the recommendations of the Windrush Lessons Learned Review, including that the Law Commission's remit should be expanded to examine simplifying the Immigration Rules. This work will become all the more pressing if the Government goes ahead with many of its proposed changes, which will only serve to add further layers of complexity to the process.* (Paragraph 236)
57. *The Home Office should take steps to improve understanding of leave to remain extensions while an application is being considered, particularly amongst government departments and public services.* (Paragraph 237)
58. We do not object to the principle of profit-making fees, providing those fees are appropriately targeted. We are concerned that elevated fees compared with similar nations put the UK at a competitive disadvantage in encouraging global talent to invest and settle in the UK. Alongside this, fees as they currently stand represent a regressive tax, with those earning the least paying the most through repeated applications. The limited availability of fee waivers compounds this problem, as do plans to extend the qualifying time for settlement. (Paragraph 247)
59. *Profits made through above cost immigration fees should be reinvested into the system to expand the availability of fee waivers, particularly at the point of applying for ILR and citizenship.* (Paragraph 248)
60. *The Government should cap immigration fees at 150% of costs to ensure the UK remains a competitive option for highly skilled workers, and ensure fees are reasonable for migrants.* (Paragraph 249)
61. The Committee is dismayed that almost four years on from its original letter to the Government, the Life in the UK test remains unreformed and therefore unfit for purpose. The Committee does not believe in scrapping the test—indeed, it views it as an important step on the process to ILR and citizenship—but it urgently needs reform. (Paragraph 257)
62. There is no need to wait until the contract for the Life in the UK Test expires in 2027 to make much needed changes to the content of the questions. (Paragraph 258)
63. *The Committee views the Life in the UK test as woefully imperfect tool that inevitably cannot truly assess a person's commitment to this country. However, we reiterate the recommendations from our 2022 letter. The Home Office should refocus the test on British values and practical aspects of living in the UK, and the test should not be multiple choice. Instead, it should involve more open-ended questions that more accurately demonstrate knowledge and engagement with life in the UK. Alongside reforms to the test, the Home Office should introduce courses which can be completed as an alternative to the test, that facilitate the learning and absorption of British culture and values. Assessment for these courses should be based on the course providers' judgement of whether the individual has engaged with the course appropriately, and be similar in style and delivery to the driving speed awareness course.* (Paragraph 259)

64. Obtaining British citizenship is a significant commitment to life in the UK and is cherished by many of those who have obtained it. Whilst we acknowledge that there may be many valid reasons for not wanting to obtain citizenship and instead remain on ILR, we believe that citizenship should be the end goal for the majority of individuals who settle in the UK. (Paragraph 266)
65. The Government does not sufficiently value citizenship, and it is concerning that the Minister for Citizenship takes no specific action to promote citizenship. Placing greater value on citizenship is important both in encouraging long term migrant residents who have chosen to settle here to obtain citizenship, in many cases becoming active political participants in the UK, and in encouraging pride in citizenship amongst people who have always been British citizens. (Paragraph 267)
66. *We believe it is the job of a responsible Government to promote citizenship, and the Government should do much more to this end. While we welcome the Government's commitment to mandate citizenship education, citizenship education should include how to obtain citizenship by registration, and the rights associated with it. As part of work to promote citizenship, the Home Office should take steps to give citizenship ceremonies a higher profile, with ceremonies taking place at more significant locations and with greater involvement of the wider community, such as at cultural or sporting events.* (Paragraph 268)
67. The Committee recognises the need for and value of Deprivation of Citizenship Orders to deal with the most severe of cases. However, we are concerned that the “public good” condition is too vague, which lends itself to future misuse and abuse. (Paragraph 278)
68. *The Government should expand the powers of the Independent Reviewer of Terrorism Legislation to review the exercise of all deprivations of citizenship with a justification that the deprivation is conducive to the public good.* (Paragraph 279)
69. *The Committee echoes the recommendation of the Independent Commission on UK Counter-Terrorism Law, Policy, and Practice that the ‘conducive to the public good’ test should be replaced with a test relating directly to acts or conduct that is seriously prejudicial to the vital interest of the United Kingdom, any of the Islands or any British Overseas territory.* (Paragraph 280)

### **The role of the Home Office and cross-departmental issues**

70. Due to policy decisions by successive governments, the Home Office is struggling to manage the immigration, settlement, and citizenship system as it currently stands. Increasing the volume and complexity of applications— notwithstanding potential modernisation and efficiency improvements—will only exacerbate this issue. Morale amongst caseworkers is low, and adding whole swathes of repeat checks alongside spending review staff reductions will further exacerbate the situation, and increase their workload and stress. (Paragraph 299)
71. *We are not convinced the Home Office will be able to deliver the proposed new system without additional staffing, and regret the lack of availability of a public staffing impact assessment. The Home Office should assess how changes to visa policy will affect caseworkers' workloads, and following this implement a national recruitment drive for immigration caseworkers to ensure there is adequate capacity to address increased demand. Alongside this, the Home Office should improve support for current and new caseworkers to reduce attrition rates and appeal rates. A greater*

*proportion of immigration caseworkers should sit at the position at least of Higher Executive Officer, with the pay band and responsibility of that grade reflecting the importance and impact of the work that they do, as well as the challenging circumstances in which they do it. (Paragraph 300)*

72. *Alongside this internal review, there should also be an independent, comprehensive assessment of the immigration and settlement system, with a particular focus on Home Office operations. This external review should examine staffing structures, operational processes, and the strategic use of technology to ensure the system is effective, efficient, and fit for purpose. (Paragraph 301)*
73. *Extension applications should be streamlined and simplified. There is no need to force caseworkers and applicants repeatedly to trawl through vast amounts of documentation to submit or approve applications. This would reduce the burden on both migrants and caseworkers, with only recent relevant changes of circumstance needing to be submitted. (Paragraph 302)*
74. Under successive Governments with differing policies, the Home Office has been too reactive on immigration issues, responding to headlines and short-term political pressures, rather than taking a long-term and holistic approach. This is compounded by data issues that run across many areas of the migration system. The result is migration and settlement policy that is not carefully thought through, long-termist, or comprehensive. (Paragraph 307)
75. The Home Office approach to Impact Assessments is inconsistent. It is not always clear that Impact Assessments have been completed, and even when they have been they are not routinely published. (Paragraph 315)
76. *It is unhelpful that a full impact assessment was not published during the consultation process for the Government's earned settlement proposals. In the absence of that impact assessment, the Government should publish an impact assessment when the decision on the earned settlement policy is made but before implementation, alongside the required primary and/or secondary legislation. (Paragraph 316)*
77. *Any major policy proposal, including but not limited to White Papers, should be published with a full Impact Assessment, to enable both those within Government, and those outside of Government, to fully assess what effect proposed changes will have; and the Government should publish revised impact assessments in light of changes following consultations. This will enable Governments to be held accountable for policies that fail to meet their own ambitions and the public to more meaningfully engage with consultations. (Paragraph 317)*
78. Immigration, settlement, citizenship, and integration sit across multiple departments, the devolved administrations and England's regions in ways that few other issues do. The Home Office does not work sufficiently well with any of these key stakeholders in this area of shared responsibility. Responsibility amongst departments and ministers is at times both unaligned and overlapping. Where there are not clear roles and responsibilities, policy becomes confused, implementation becomes patchwork and inconsistent, and real people are negatively affected. (Paragraph 330)
79. *The Government should clarify ministerial responsibilities, particularly in light of the dramatic changes proposed in 2025 and 2026. (Paragraph 331)*
80. The Home Office responds to immigration and settlement issues primarily through the lens of net migration and labour market considerations. This fundamentally misses the issue that concerns public opinion, namely

the impact of immigration and settlement on public services and their communities. (Paragraph 332)

81. *A Triennial Migration Plan, with progress updates annually, similar to the Spending review, should be introduced. The Plan should be co-owned by the Home Office and Cabinet Office, and should reflect the priorities of different Government departments, the devolved nations, and local government, as they relate to migration. This will provide clarity and reassurance to the public, alongside ensuring that different bodies work more closely together. This plan would be qualitative rather than quantitative, focusing on the principles guiding the Government's migration and settlement decisions, and outlining predicted impacts of policy decisions rather than proposing a cap or estimate of numbers. (Paragraph 333)*
82. *The Government should reintroduce the Migration Impacts Forum. This body would feed into the Migration Plan and would focus efforts on understanding the societal impacts of migration as opposed to the macroeconomic impacts. (Paragraph 334)*

## APPENDIX 1: LIST OF MEMBERS AND DECLARATIONS OF INTEREST

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Lord Anderson of Ipswich (member from 27 January 2026)  
 Lord Bach  
 Baroness Bertin  
 Baroness Buscombe  
 Baroness Cash  
 Lord Dubs  
 Lord Filkin (member until 27 January 2026)  
 Lord Foster of Bath  
 Lord Henley (member until 29 April 2026)  
 Lord Hogan-Howe  
 Baroness Hughes of Stretford  
 Baroness Meacher (member until 28 October 2025)  
 Lord Moraes (member from 27 January 2026)  
 Baroness Prashar (member until 27 January 2026)  
 Lord Tope

### Declarations of interest

Lord Anderson of Ipswich (member from 27 January 2026)  
*Son-in-law came to the UK in 2022 as a foreign national with a spousal visa, on a 5-year path to ILR.*

Lord Bach  
*No relevant interests to declare.*

Baroness Bertin  
*No relevant interests to declare.*

Baroness Buscombe  
*No relevant interests to declare.*

Baroness Cash  
*No relevant interests to declare.*

Lord Dubs  
*I am a naturalised British refugee.*

Lord Filkin (member until 27 January 2026)  
*No relevant interests to declare.*

Lord Foster of Bath  
*No relevant interests to declare.*

Lord Henley (member until 29 April 2026)  
*No relevant interests to declare.*

Lord Hogan-Howe  
*No relevant interests to declare.*

Baroness Hughes of Stretford  
*No relevant interests to declare.*

Baroness Meacher (retired, member until 28 October 2025)  
*No relevant interests to declare.*

Lord Moraes (member from 27 January 2026)  
*I am an unpaid patron of the Project for the Registration of Children as British Citizens (PRCBC). PRCBC is a non-profit NGO.*

Baroness Prashar (member until 27 January 2026)  
*None, other than I am an immigrant to this country!*

Lord Tope

*No relevant interests to declare.*

**Specialist Adviser**

Dr Ben Brindle

*Researcher, Migration Observatory at the University of Oxford.*

## APPENDIX 2: LIST OF WITNESSES

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Evidence is published online at: <https://committees.parliament.uk/work/9453/settlement-citizenship-and-integration/>.

Evidence received by the committee is listed below in alphabetical order

### Alphabetical list of witnesses

Amnesty International UK	<a href="#">SCI0403</a>	
Andromeda-Sim	<a href="#">SCI0070</a>	
Anonymised	<a href="#">SCI0361</a>	
Anonymised	<a href="#">SCI0440</a>	
Anonymised	<a href="#">SCI0485</a>	
Anonymised	<a href="#">SCI0506</a>	
Marianela Barrios Aquino	<a href="#">SCI0532</a>	
Arts and Humanities Research Council Connecting Solidarities Project, University of Derby	<a href="#">SCI0601</a>	
The Association for Citizenship Teaching	<a href="#">SCI0460</a>	
Dr Roxana Barbulescu	<a href="#">SCI0473</a>	
Barnardo's	<a href="#">SCI0602</a>	
Professor Leah Bassel, Dr Jasber Singh and Professor Giorgia Doná	<a href="#">SCI0505</a>	
The Bell Foundation	<a href="#">SCI0491</a>	
Bindmans LLP	<a href="#">SCI0348</a>	
Dr Ana-Maria Bliuc	<a href="#">SCI0242</a>	
British Future		<a href="#">QQ 1–21</a> , Sunder Katwala, Director
Professor Thom Brooks, Durham University	<a href="#">SCI0607</a>	<a href="#">QQ 78–88</a>
Hleb Buziuk	<a href="#">SCI0078</a>	
Cambridge University Press & Assessment	<a href="#">SCI0355</a>	
Dr Dilek Çelebi	<a href="#">SCI0583</a>	
Central England Law Centre	<a href="#">SCI0394</a>	
Dr Olena Chub	<a href="#">SCI0535</a>	
The Coalition for Language Education	<a href="#">SCI0393</a>	
Dr Jonathan Collinson	<a href="#">SCI0245</a>	

Professor Gareth Davies, Professor of European Law, Vrije Universiteit Amsterdam	<a href="#">QQ 62–77</a>	
Reverent Lukas Dewhirst	<a href="#">SCI0574</a>	
Reverend Valerie Fairclough	<a href="#">SCI0279</a>	
Greater Manchester Immigration Aid Unit	<a href="#">SCI0487</a>	
Professor Elspeth Guild, Global Chair in Social Justice, School of Law and Social Justice, University of Liverpool	<a href="#">QQ 41–51</a>	
Professor Randall Hansen, Canada Research Chair in Global Migration, University of Toronto	<a href="#">QQ 52–61</a>	
Haringey Migrant Support Centre	<a href="#">SCI0541</a>	
Helen Bamber Foundation	<a href="#">SCI0429</a>	
Mary Helme	<a href="#">SCI0463</a>	
Hibiscus Initiatives	<a href="#">SCI0488</a>	
Home Office	<a href="#">QQ 152–173</a> , Mike Tapp, Minister for Migration and Citizenship, Dan Hobbs, Director General, Migration and Borders Group	
Homeless Link, NACCOM	<a href="#">SCI0406</a>	
Hong Kong Business Hub	<a href="#">SCI0553</a>	
Dr Sarah M Hughes	<a href="#">SCI0353</a>	
Human Rights Solidarity	<a href="#">SCI0534</a>	
Byron Hyde	<a href="#">SCI0303</a>	
Emmanuel Ikhená	<a href="#">SCI0612</a>	
Immigration Law Practitioners' Association (ILPA)	<a href="#">SCI0514</a>	<a href="#">QQ 22–40</a> , Zoe Bantleman, Legal Director
Independent Commission on UK Counter-Terrorism Law, Policy and Practice	<a href="#">SCI0477</a>	
Independent Monitoring Authority	<a href="#">SCI0372</a>	
Institute for Government (IfG)	<a href="#">QQ 89–107</a> , Shaina Sangha, Immigration and Asylum Researcher	

The Institute on Statelessness and Inclusion, Impact Law for Social Justice	<a href="#">SCI0496</a>	
International Rescue Committee	<a href="#">SCI0507</a>	
Islington Law Centre	<a href="#">SCI0503</a>	
Professor Christian Joppke, Professor of Sociology, Department of Political Science, LUISS University, Rome		<a href="#">QQ 62–77</a>
Justice for Sponsored Workers Campaign and Migrants at Work	<a href="#">SCI0603</a>	
Ms Lam	<a href="#">SCI0527</a>	
Latin American Women’s Rights Service (LAWRS)	<a href="#">SCI0468</a>	
Dr Humphrey Lau	<a href="#">SCI0530</a>	
Laura Devine Immigration	<a href="#">SCI0550</a>	
The Law Society of England and Wales	<a href="#">SCI0378</a>	
The Law Society of Scotland	<a href="#">SCI0614</a>	
Lewis Silkin LLP	<a href="#">SCI0609</a>	
Liberty	<a href="#">SCI0492</a>	
Dr Gwyneth Lonergan	<a href="#">SCI0510</a>	
Long Residence Advocacy Group	<a href="#">SCI0442</a>	
Professor Alan Manning, Professor of Economics, London School of Economics		<a href="#">QQ 1–21</a>
Mr Daniel May	<a href="#">SCI0098</a>	
Migrant Voice	<a href="#">SCI0375</a>	
Migrants at Work	<a href="#">SCI0495</a>	
Migrants’ Rights Network, Not a Stranger Campaign Group	<a href="#">SCI0455</a>	
Migration Observatory		<a href="#">QQ 108–118</a> , Dr Madeleine Sumption MBE, Director
Migration Watch UK	<a href="#">SCI0605</a>	<a href="#">QQ 89–107</a> , Alp Mehmet MVO, Chair
Migration Yorkshire	<a href="#">SCI0497</a>	
Professor Linda Morrice, Professor Jenny Phillimore and Dr Alison Strang	<a href="#">SCI0371</a>	
Kousik Nandy	<a href="#">SCI0286</a>	

National Audit Office	<a href="#">QQ 130–151</a> , Tim Phillips, Director, Home Affairs Value for Money, Richard Baynham, Senior Audit Manager
National Secular Society	<a href="#">SCI0397</a>
NRPF Network	<a href="#">SCI0454</a>
Office for National Statistics	<a href="#">QQ 119–129</a> , Mary Gregory, Executive Director of Population, Census and Social Statistics
Professor Ricky van Oers, Professor of Immigrant Inclusion and Law, Western Norway University of Applied Sciences, and Assistant Professor, Centre for Migration Law, Radboud University, The Netherlands	<a href="#">QQ 62–77</a>
Dr Aneta Piekut, Dr Zanib Rasool	<a href="#">SCI0470</a>
Policy Exchange	<a href="#">QQ 89–107</a> , David Goodhart, Head of Demography, Immigration and Integration
Project for the Registration of Children as British Citizens (PRCBC)	<a href="#">SCI0399</a>
Reading Hongkongers CIC	<a href="#">SCI0404</a>
Refuge	<a href="#">SCI0457</a>
Refugee & Migrant Children's Consortium	<a href="#">SCI0593</a>
Refugee and Migrant Centre	<a href="#">SCI0499</a>
Refugee and Migrant Forum of Essex and London (RAMFEL)	<a href="#">SCI0490</a>
The Refugee Council	<a href="#">SCI0400</a>
RETAS Leeds	<a href="#">SCI0370</a>
Reunite Families UK	<a href="#">SCI0483</a>
Rights & Security International	<a href="#">SCI0511</a>
Rights of Women	<a href="#">SCI0554</a>
Roma Support Hub	<a href="#">SCI0608</a>
Royal College of General Practitioners	<a href="#">SCI0453</a>
Royal College of Nursing	<a href="#">SCI0613</a>

Runnymede Trust, Praxis	<a href="#">SCI0474</a>	
Dr Bernard Ryan	<a href="#">SCI0599</a>	
A Saunders	<a href="#">SCI0419</a>	
Section of Architectural Workers (SAW-Unite)	<a href="#">SCI0587</a>	
Mr Sheung-Kwun, Ms Leung	<a href="#">SCI0258</a>	
Jon Simmons, former Head of Immigration Statistics and Chief Statistician, Home Office	<a href="#">SCI0606</a>	<a href="#">QQ 130–151</a>
Skilled Worker Justice Alliance Consolidated Submission	<a href="#">SCI0610</a>	
Dr Mike Slaven	<a href="#">SCI0315</a>	
Society of Spanish Researchers in the UK	<a href="#">SCI0458</a>	
Southall Black Sisters	<a href="#">SCI0600</a>	
Sri Lankan Skilled Migrant Alliance UK	<a href="#">SCI0202</a>	
Claire Stewart	<a href="#">SCI0376</a>	
Talent Beyond Boundaries	<a href="#">SCI0502</a>	
the3million	<a href="#">SCI0456</a>	
P C Tong	<a href="#">SCI0433</a>	
Dr Anna Tuckett	<a href="#">SCI0369</a>	
Dr Tariq Umar	<a href="#">SCI0339</a>	
UNISON	<a href="#">SCI0407</a>	
University of Birmingham's Refugee Sponsorship Research Hub	<a href="#">SCI0464</a>	
Wesley Gryk Solicitors LLP		<a href="#">QQ 22–40</a> , Barry O'Leary
Sai Chak Wong	<a href="#">SCI0452</a>	
Simon Wong	<a href="#">SCI0113</a>	
Work Rights Centre	<a href="#">SCI0413</a>	
Dr Chi Zhang	<a href="#">SCI0395</a>	

## APPENDIX 3: CALL FOR EVIDENCE

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### Settlement, Citizenship and Integration

The Justice and Home Affairs Committee is conducting an inquiry into settlement, citizenship, and integration. The Government announced a number of proposed changes in these areas in the White Paper Restoring control over the immigration system, published in May, and the subsequent Policy Paper Restoring order and control: A statement on the Government's asylum and returns policy, published in November. A Government consultation on earned settlement is also under way. The Committee is launching this Inquiry in the context of these developments and wider international and longer-term trends.

A key area of focus will be on the process of applying for and gaining British citizenship, including aspects not directly included in the current Government consultation. In this, the Committee is particularly keen to hear from those with experience of the process. The Committee is interested to learn about the complexity involved in applying for Indefinite Leave to Remain (ILR) and subsequently citizenship, alongside the costs involved. Following up on the Committee's work on the Life in the UK Test, it is also interested to hear and potentially inform how the Government will "refresh" the test. The Committee will also examine the role of citizenship ceremonies and the celebration of citizenship in the UK.

The Committee also intends to examine whether the Government's current approach is consistent with historical British policy, as well as how it compares with other countries across the world. The Committee will examine the role of the Home Office in respect of immigration and citizenship.

The Inquiry will also look at measures to aid integration and social cohesion in the processes that lead to permanent settlement and citizenship. The Committee will assess the consequences of becoming a British citizen compared to remaining on Indefinite Leave to Remain, and look at the English language requirements for those coming to the UK, and the impact these have on integration.

The Committee welcomes views on any of the following questions relating to the subject of the inquiry. There is no obligation to answer every question, and the Committee recognises that respondents will not necessarily be interested in all the areas covered by the inquiry. Respondents are encouraged to draw attention to important issues related to the inquiry that are not covered in the questions below but which they think the Committee should consider in its work.

The topics covered in this inquiry impact the whole UK, and some of the questions may have an impact on the Crown Dependencies and British Overseas Territories. The Committee is eager to hear perspectives from Wales, Scotland, and Northern Ireland, in addition to England. The Committee also welcomes evidence relating to other countries that could inform the Committee's consideration.

#### *Recent developments in Government policy on settlement and citizenship*

- (1) What is the policy intention behind the proposals on settlement and citizenship, and will the proposed changes have the intended effect? What are the terms and conditions of settlement in the UK?
- (2) Is it preferable to have a system whereby it is hard to get a visa but easier to get permanent status, or easy to get a visa but harder to get permanent status?

- (3) What does the Government mean by the concepts of “earned settlement” and “earned citizenship”, and what should the terms mean?
- (4) What are the implications of having many long-term residents on temporary visas without access to ILR and/or citizenship?
- (5) Are public attitudes and concerns related to immigration and citizenship being addressed? What are the wider issues that the Government is considering in making these changes?
- (6) What are the implications of the proposed changes on the devolved nations of the UK and on the Common Travel Area?

#### *Historical and International Context*

- (7) How does the UK’s policy on permanent residence and citizenship compare with other countries, particularly those in Europe and the Commonwealth?
- (8) Are the concepts of “earned settlement” and “earned citizenship” consistent with historical British policy?
- (9) In the light of previous errors and failings (such as the Windrush scandal), is the Home Office capable of implementing policy changes? Should responsibility for immigration, nationality and citizenship remain with the Home Office and, if not, where should it rest?
- (10) Relating to Citizenship Deprivation Orders, is the UK now a country where citizenship is becoming more difficult to obtain and easier to lose?

#### *The Citizenship Process*

- (11) Is the process of applying for ILR and Citizenship too complex, or is complexity unavoidable?
- (12) What are the total costs and requirements of applying for ILR and citizenship, and how do they compare with other countries?
- (13) What should be the purpose of the Life in the UK Test? What is the rationale for the Government’s “refresh” of the Test? Are there other ways of assessing a person’s commitment to life in the UK, including an acceptance of the UK’s values?
- (14) Under the Immigration White Paper’s expansion of the points-based system, what will happen to those who never ‘earn’ enough points to achieve ILR or citizenship?
- (15) Is citizenship a right or a privilege? Who is entitled to citizenship?
- (16) Does the Government do enough to promote citizenship? Is it sufficiently celebrated, and what role do citizenship ceremonies play in the process?

#### *Applying for Citizenship and its impact on integration and social cohesion*

- (17) What are the advantages of becoming a British citizen versus remaining on Indefinite Leave to Remain and should there be certain benefits

reserved for citizenship? What other reforms to the citizenship process should be considered and would they require changes to primary legislation?

- (18) Does the UK have an ‘integration problem’?
- (19) Can a system which emphasises high skills and English language afford to be more generous in terms of integration policy?
- (20) Should it be a requirement that everyone is able to speak some English before they come to the UK? How do we ensure once they come to the UK, they can speak English within a reasonable time frame?

Written submissions are requested by 23 January 2026 but in view of the ongoing Government consultation, earlier submissions are welcome.

## APPENDIX 4: MINUTES OF PROCEEDINGS ON THE REPORT

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**Tuesday, 2 June 2026**

Present:

Lord Anderson of Ipswich  
 Lord Bach  
 Baroness Bertin  
 Baroness Buscombe  
 Baroness Cash  
 Lord Dubs  
 Lord Foster of Bath (Chair)  
 Baroness Hughes of Stretford  
 Lord Moraes  
 Lord Tope

### Apologies and Notices

Apologies were received from Lord Hogan-Howe.

### Settlement, Citizenship and Integration inquiry: Sixth report consideration

The Committee considered the Chair's draft report. Amendments were agreed.

#### (a) Retrospection

Baroness Buscombe moved the following amendment:

Leave out the following paragraphs (129-131):

“Any retrospective change would be manifestly unfair—and may be unlawful—towards migrants, who have planned their lives around the current system and made significant long-term decisions, such as career, housing, and family life decisions with the expectation that they would be able to qualify for ILR under the current rules. This is egregious in the case of migrants on the Hong Kong BN(O) visa route, given that previous Government statements had assured BN(O)s that they would have a route to British citizenship without any such requirements.

The UK's reputation would be adversely impacted by retrospective action, which will likely make the UK a less attractive destination for highly skilled migrants in the future.

Any changes to ILR rules should not apply retrospectively to individuals who are already on a qualifying route. While the Government may not support the previous Government's decision to open certain visa routes, that decision has already been made. Many migrants made significant long-term decisions with the expectation of acquiring ILR after five years.”

and insert:

“While it is unusual to apply such changes retrospectively, in this case we support the Government's decision to apply changes to the route to settlement retrospectively, due to the unprecedented and severe challenges already confronting the NHS, housing supply, the criminal justice system, welfare system and public services generally.”

Question put, that the amendment in the name of Baroness Buscombe be agreed to.

The Committee divided:

<i>Content</i>	<i>Not Content</i>	<i>Abstention</i>
Baroness Bertin	Lord Anderson of Ipswich	Nil
Baroness Buscombe	Lord Bach	
Baroness Cash	Lord Dubs	
	Lord Foster of Bath	
	Baroness Hughes of Stretford	
	Lord Moraes	
	Lord Tope	

The amendment was therefore disagreed to.

(b) Extension of ILR qualifying period

Lord Anderson of Ipswich moved the following amendment:

Leave out the following paragraph (paragraph 111):

“While we note the concerns and risks raised in evidence we have received, we support the Government’s proposals to extend the baseline qualifying time for Independent Leave to Remain to 10 years, to 15 years for those on work visas below RQF 6, and to 20 years for refugees on the core protection route. This would retain appropriate incentives and disincentives for migrants to come to the UK, appropriate deterrent for those seeking asylum, and limit the fiscal impact of migration and asylum on the UK economy.”

and insert:

“Extending the qualifying time to ILR risks undermining integration by reducing affected migrants’ security of status—this would limit their ability to make long-term employment, family, and housing decisions. In addition, the high cost of immigration application fees and the Immigration Health Surcharge for migrants risks increasing poverty among low-income migrants. In some cases, those who are unable to afford to renew their status may fall out of legal status, increasing the size of the unauthorised migrant population if they do not depart the UK.

The Government’s proposal of a 20-year settlement route for refugees with reviews of their refugee status every 2.5 years risks compromising integration and undermines opportunities for refugees to make long term decisions regarding work, family or other aspects of life.

We do not support the Government’s proposals to extend the baseline qualifying time for Independent Leave to Remain to 10 years, to 15 years for those on work visas below RQF 6, and to 20 years for refugees on

the core protection route. The Government should instead explore the option of retaining the 5 year baseline qualifying time for Independent Leave to Remain, while separating Independent Leave to Remain from access to public funds. Migrants with ILR could remain subject to the No Recourse to Public Funds condition until they have resided in the UK for 10 years and/or obtained British citizenship.”

Question put, that the amendment in the name of Lord Anderson of Ipswich be agreed to.

The Committee divided:

<i>Content</i>	<i>Not Content</i>	<i>Abstention</i>
Lord Anderson of Ipswich	Baroness Bertin Baroness Buscombe	Nil
Lord Bach	Baroness Cash	
Lord Dubs		
Lord Foster of Bath		
Baroness Hughes of Stretford		
Lord Moraes		
Lord Tope		

The amendment was therefore agreed to.

(c) Eligibility for ILR

Lord Bach moved the following amendment:

After paragraph 136, insert:

“Eligibility for ILR should still (with appropriate exemptions) be dependent on meeting minimum requirements such as no criminal convictions, certain financial criteria, and English language proficiency.”

Question put, that the amendment in the name of Lord Bach be agreed to.

The Committee divided:

<i>Content</i>	<i>Not Content</i>	<i>Abstention</i>
Lord Anderson of Ipswich	Baroness Bertin Baroness Buscombe	Nil
Lord Bach	Baroness Cash	
Lord Dubs		
Lord Foster of Bath		
Baroness Hughes of Stretford		
Lord Moraes		
Lord Tope		

The amendment was therefore agreed to.

(d) Exemptions to mandatory income requirements

Baroness Buscombe moved the following amendment:

In paragraph 201, leave out:

“Migrants on maternity leave and those with long-term illnesses or disabilities should be exempt from meeting the mandatory requirement of having an income of £12,570 for three to five years. This exemption should also cover unpaid carers.”

Question put, that the amendment in the name of Baroness Buscombe be agreed to.

The Committee divided:

<i>Content</i>	<i>Not Content</i>	<i>Abstention</i>
Baroness Buscombe	Lord Anderson of Ipswich	Baroness Bertin
Baroness Cash	Lord Bach	
	Lord Dubs	
	Lord Foster of Bath	
	Baroness Hughes of Stretford	
	Lord Moraes	
	Lord Tope	

The amendment was therefore disagreed to.

(e) Abolition of the Life in the UK test

Lord Bach moved the following amendment:

Leave out the following paragraph (260):

“The Committee views the Life in the UK test as a woefully imperfect tool that inevitably cannot truly assess a person’s commitment to this country. However, we reiterate the recommendations from our 2022 letter. The Home Office should refocus the test on British values and practical aspects of living in the UK, and the test should not be multiple choice. Instead, it should involve more open-ended questions that more accurately demonstrate knowledge and engagement with life in the UK. Alongside reforms to the test, the Home Office should introduce courses which can be completed as an alternative to the test, facilitate the learning and absorption of British culture and values. Assessment for these courses should be based on the course providers’ judgement of whether the individual has engaged with the course appropriately, and be similar in style and delivery to the driving speed awareness course.”

and insert:

“The Committee views the Life in the UK test as a woefully imperfect tool that inevitably cannot truly assess a person’s commitment to this

country. The Government should abolish the test, and replace it with a mandatory course, which facilitates the learning and absorption of British culture and values. Assessment for these courses should be based on the course providers' judgement of whether the individual has engaged with the course appropriately, and be similar in style and delivery to the driving speed awareness course."

Question put, that the amendment in the name of Lord Bach be agreed to.

The Committee divided:

<i>Content</i>	<i>Not Content</i>	<i>Abstention</i>
Lord Bach	Lord Anderson of Ipswich	Baroness Hughes of Stretford
Lord Dubs	Baroness Bertin	
Lord Moraes	Baroness Buscombe	Lord Tope
	Baroness Cash	
	Lord Foster of Bath	

The amendment was therefore disagreed to.

The Committee agreed to consider and agree the final report at the following meeting alongside the summary.

**Tuesday, 9 June 2026**

Present:

Lord Bach  
 Baroness Bertin  
 Baroness Buscombe  
 Baroness Cash  
 Lord Dubs  
 Lord Foster of Bath (Chair)  
 Baroness Hughes of Stretford  
 Lord Hogan-Howe  
 Lord Moraes

### **Apologies and Notices**

Apologies were received from Lord Anderson of Ipswich and Lord Tope.

### **Settlement, Citizenship and Integration: Seventh report consideration**

The Committee considered the Chair's summary and draft report.

The Chair moved that the draft report as amended be the report of the Committee.

The Committee divided:

*Content*

Lord Bach

Lord Dubs

Lord Foster of Bath

Lord Hogan-Howe  
Baroness Hughes of  
Stretford

Lord Moraes

*Not Content*

Nil

*Abstention*

Baroness Bertin

Baroness Buscombe

Baroness Cash

The report was agreed and ordered to be printed.

## **APPENDIX 5: SUMMARY OF CONFIDENTIAL WRITTEN EVIDENCE**

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1. The Committee received over 600 written evidence submissions responding to the inquiry call for evidence. This far exceeds the typical volume of evidence received by House of Lords committees. Submissions were received from a range of academics, charities, Government, campaigns and organisations, which will be circulated separately. Individuals sharing their views and personal experiences made up the majority of submissions.
2. The Committee agreed, at its meeting on 27 January 2026, not to receive the individual submissions sharing personal views and experience due to the sensitive and personal nature of the content. This evidence will be accepted as confidential evidence and not published. This summary provides details of the key themes and recommendations shared in these submissions.
3. Individual submissions were received from those on a range of visas who arrived through legal or illegal means, on work-based, family or humanitarian routes, in various job roles and circumstances, whether as the main applicant or dependant. The Committee received a large number of submissions from Hong Kong British National (Overseas) (BN(O)) visa holders, European Community Association Agreement (ECAA) Turkish Worker and Businessperson visa holders, Skilled Workers and refugees, as well as a range of other settlement routes. Submissions were also received from those who simply wish to share their views on immigration, those with working with migrants, and family and friends of those who are going through the immigration system.
4. A number of submissions were received that appear to be duplicates of evidence submitted to both the Government consultation on earned settlement and the House of Commons Home Affairs Committee inquiry into Routes of Settlement. Submissions also appear to use some pro forma structures and may duplicate points across submissions from different family members.

### **Recent Developments in Government policy on settlement and citizenship**

5. The majority of submissions highlight the substantial negative impact of the announced immigration reforms, resulting in instability and anxiety until the reforms are finalised.
6. A number of submissions raise criticisms with the consultation process in particular the phrasing of the questions, and in relation to the lack of impact assessments provided for the proposed reforms.
7. Submissions reflect on the reasons for coming to the UK including to create a better life for themselves and their family, to work, to study, and the broader appeal of the UK. Many submissions discuss the positive experience of living in the UK, working, growing their family, contributing to the country and participating in society.
8. Submissions also cover challenges relating to settling in the UK under the current immigration system and cite:
  - the challenges related to initially getting on existing visa routes;
  - the uncertainty of any temporary migrant status;

- the higher financial costs for migrants such as increased mortgage rates and deposits and larger rental advances;
  - Complexities of finding work, with references to university level education in home countries not facilitating a similar level of employment in the UK; and
  - Some share difficult experiences of discrimination and racism.
9. Submissions share the life changing decisions made to facilitate moving to the UK such as leaving family, quitting jobs, selling homes, taking out loans and postponing growing their families. Submissions explain the decisions they made to come to the UK were on the basis of the existing conditions of the UK's immigration system, and they could not have planned for the proposed reforms and cannot make changes prior to implementation to meet new requirements, and in a number of cases the proposed reforms would have affected their decision to move to the UK.

#### *Policy intention for proposals*

10. A number of submissions note the political motivations for changes and an intention to reduce immigration and limit access to permanent residency. Many submissions suggest the proposed changes will not meet the Government's stated purposes of reform.

#### *Proposed reforms*

11. Many submissions highlight the significant psychological distress and hardship if the reforms proposed are implemented.
12. There is a broad consensus across most of the individual submissions that the reforms should only apply to new applicants, and not to those already on a pathway to Indefinite Leave to Remain (ILR) or citizenship. Submissions argue reforms should not be applied retrospectively and transitional arrangements should be put in place so those on settlement pathways are not impacted.
13. Submissions point out that retrospective application has a longer-term impact, as it indicates the reformed system could also be subject to future retrospective changes. Submissions argue this creates further uncertainty and reduces trust in the system with wider implications for both resident migrants and prospective migrants coming to the UK.
14. Many submissions note that visa holders moved here under the legitimate expectation of the rules in place continuing to apply to them, and reference the case of *HSMP Forum Ltd, R (on the application of) v Secretary of State for the Home Department* [2008] EWHC 664 (Admin) (08 April 2008), where the High Court ruled in favour of HSMP Forum and therefore the government could not apply new rules retrospectively. Others refer to this as a breach of contract.
15. Some submissions call for proposals not to proceed, with existing requirements to be retained. Others propose alternative middle grounds.
16. Many submitters note they are a substantial way through their current pathways to ILR and raise the disproportionate impact on them to adjust to proposed changes.

17. Several submissions also raise the impact of proposed reforms across visa routes on Article 8 of both the European Convention on Human Rights (ECHR) (and the Human Rights Act (HRA) 1998), establishing the right to respect for family and private life. The UN Convention on the rights of the child is also referenced. This was raised across a range of visa routes, in particular where family ILR is currently linked, the proposals introduce a disparity of qualifying timeframes across families due to salary thresholds and contribution which results in continued uncertainty for the family, any children and could result in separation. Submissions particularly note this in relation to routes for the family of British citizens and how complex the changes will make this process.
18. Submissions note the following effects of applying proposed changes, particularly in relation to extended qualifying periods:

*Financial impact and possible resulting hardship*

19. Continuing visa fees, renewal costs, Immigration Health Surcharge (IHS) costs, and any legal and administrative fees involved.
20. Continuing increased housing costs as set out above.
21. Possible relocation—the emotional and financial implications, and feasibility of uprooting life and moving. A number of submitters who have refugee status note that as they have received asylum in a safe country they could not relocate despite the significant impact of the proposed reforms.
22. Impact on career progression, pay and development—many submissions raise that extending qualifying periods continues the dependence on employers providing sponsorship and the risks that entails:
23. Migrants are limited to employers who can and will take on migrant workers who do not have ILR or Citizenship. This narrows the range of options available. Under some routes migrants are limited in terms moving sector, whether for employment or starting a business.
24. Submissions note that sponsoring employers can have their licence revoked resulting in having to move to find work.
25. The sponsorship process can limit pay progression as have contracted terms and salaries based on job role and market rates which does not promote development and mobility.
26. Submissions highlight that this system results in a lack of bargaining power in negotiations and in extreme cases can led to exploitation.
27. Submissions suggest that employers feel the burden of sponsorship costs and administration. A small number of submissions note that the Immigration Skills Charge recently increased by 32%, and how this contradicts the Government's intention to make switching employers easier under the proposed reforms.
28. Inability to make longer term plans for the future - whether this is family planning, buying a house or car, and education whether for themselves or for children. This can result in very difficult decisions having to be made. These long-term goals being paused or halted could result in lack of investment

in the UK such as through housing or local expenditure if migrants send money home instead.

*Impact on children:*

29. The emotional impact of continued insecurity for both them and their parents and concern about leaving a country they consider home.
30. Education—whether this is affected by where parents work or can get accommodation, or in the longer-term if do not achieve ILR when anticipated could result in international student fees for university notwithstanding long-term residence and therefore potentially impact children achieving university level education or bearing the increased financial cost.
31. Children turning 18 prior to parents gaining ILR—a number of submissions raise concerns that some families will be in a position where although their child was under 18 upon arrival in the UK their child will turn 18 prior to the parents achieving ILR under new rules, leaving young adults to possibly need to apply for ILR independently which under proposed reforms would be challenging. Submissions call for children to be able to apply for ILR at the same time as parents and greater clarity on the position of these children.

*Skilled Workers*

32. A number of submissions note the Skilled Worker visa condition that secondary employment can only be for 20 hours per week. This is reported to limit capacity to earn additional funds to meet any revised settlement salary thresholds.

*Refugee status*

33. Submissions focusing on asylum/refugee route, set out that this route to settlement has never been employment or contribution based, it is founded on international humanitarian commitments and therefore proposed changes appear at odds with the historic intention.
34. Submissions also note that those seeking asylum who have been granted refugee status in a safe country cannot move elsewhere, so cannot do this if the proposed reforms become unsuitable.
35. Two submissions note that changes mean that if individuals arrive on a visitor visa and then make an asylum application this would be considered entering illegally, and result in a substantial extension to 20 years until ILR. Submissions argue this contradicts this internationally recognised method of claiming asylum.

*Hong Kong British National (Overseas) (BN(O)) visa holders*

36. Many submissions focus on the BN(O) visa route. Submissions discuss the historical context of the UK's obligations and connection to Hong Kong, and how the proposed additional salary threshold and higher English language standard is contradictory to this history and purpose of this route. A recurring theme submissions raise is the impact on the older generation who may struggle to meet these requirements.
37. A number of these submissions believe the Government should grant full British Citizenship to BN(O) visa holders, referencing Lord Goldsmith's

citizenship review. Submissions state the continuation of a six-tier nationality system puts the UK at odds with other democratic countries.

38. Other submissions note that asylum seekers will continue to come from Hong Kong and they should not be subject to the proposed reforms.
39. These submissions also raise difficulties in assessing their Mandatory Provident Fund (MPF), a compulsory retirement savings scheme, as if BN(O) visa holders do not achieve ILR they cannot access their MPF before the age of 65 as Hong Kong will not accept BN(O) visa status as evidence of permanent departure. Submissions note this could result in BN(O) holders struggling financially as they cannot access these savings.

#### *European Community Association Agreement (ECAA) Turkish Worker and Businessperson visas*

40. The submissions discussing this route set out the historic nature of this visa route, how it has now closed and therefore the finite number of people impacted by the proposed reforms. Submissions note it is disproportionate to make changes to a closed route
41. Those submissions focusing on the ECAA Turkish Businessperson visa note the increased level of restrictions on this route in terms of self-employment, and a small number reference the differences in approach compared to the Innovator Founder route.

#### *Volunteering*

42. Several submissions note the importance of volunteering in assessing contribution to the UK, but cautioned against making this requirement mandatory, due to impact on those whose working hours or caring responsibilities or personal capacity does not facilitate this.

#### *Vulnerability*

43. The reforms are seen as punitive, a number of submissions raise concerns for young people, lower-earners, older people, people with disabilities or those who have or develop long-term illness who will be more vulnerable under reforms.

#### *No Recourse to Public Funds*

44. Submissions note there are many routes that do not have access to public funds.
45. Many submissions call for accessing public funds not to be included in considerations for qualifying periods extension. Others suggest alternative approaches such as retaining ILR after 5 years but restricting access to public funds for a further 5 years, or limit access to public funds to citizenship.
46. Several submissions note the distinction of the refugee route with regard to public funds as this is a humanitarian route, public funds are seen as essential to enable people to start new lives, with many stating they only rely on public funds as a necessity which current rules allow. Some submissions share this would undermine the refugee route if penalised for accessing public funds available to them. A couple of submissions note the wider impact on creating a stigma to access public funds.

*Disparities between pathways*

47. A number of submissions raise concerns regarding disparities between pathways. Examples include the differing support levels for asylum route compared to Skilled Worker visa holders.
48. Submissions raise EU Settled Status in comparison to both other routes such as Skilled Workers, ECAA and with British citizens' ability to ensure spouses can reside in the UK. A number of submissions note that households are treated as one unit under the EU Settlement Scheme.
49. A number of submissions state that changing the qualifying baseline to 15-years for workers below RQF level 6 would result in a longer settlement route than resettled refugees, which they argue is in contradiction to the Government's statement that refugees will not be better off than migrants on recognised routes (such as workers).

*Guidance and clarity*

50. Many submissions note the need for clear guidance once reforms are finalised to assist visa holders and employers. A number also call for clear and prompt communication regarding the finalised changes.

*Long-term residents on temporary visas without access to ILR and/or citizenship*

51. Several submissions note concerns that reforms will result in long-term residents who cannot access ILR and subsequently Citizenship and remain on a temporary basis. This risks creating a marginalised underclass, who continue to contribute but are not recognised for this and granted the stability of permanent residence. Many submissions highlight the unfairness of this outcome, and the resulting psychological impact, continued uncertainty, limitation on integration and the risk of exploitation.

*Public attitudes*

52. Submissions reflect a range of views on public attitudes towards immigration, with a number noting ongoing anti-migrant rhetoric, and concerns that there is a conflation of illegal migrants which posed the most concern to the public, and legal migrants who come through humanitarian, family and work routes.

*'Earned settlement' and 'earned citizenship'*

53. Submissions note that migrants are already earning settlement through their residence on existing routes, such as continuous residence, continuous employment, payment of taxes and National Insurance contributions, payment of house or rental expenses and council tax, paying visa and IHS payments, contributing to pensions, lawfully participating in UK society, good character and completing the Life in the UK test and English tests.
54. Some submissions identify that the concept of earned settlement makes people feel undervalued and that their contributions to date are not enough and have to start again. Many submissions feel the current 5-year period required on many routes is sufficient to demonstrate commitment to country in the long-term and believe it is unclear what the extended qualifying periods would achieve.

55. Several submissions raise concerns regarding a clear definition of earned settlement and earned citizenship. This would need to be understandable to be achievable. Submissions call for the requirements under these terms to be proportionate and consistent.
56. A number of submissions note that earned settlement and earned citizenship should consider wider factors such as studying, volunteering and training preparing for work alongside salary and work level. Some submissions call for time on a student or Graduate visa to contribute to qualifying periods, as during the course of these routes individuals are contributing through university fees, taxes and local spending. This links to submissions regarding those on the 10-year lawful residence (long residence) route which ask to retain this route and not to alter the contribution of Student and Graduate visas to the qualifying period of the route.
57. Many submissions highlight the substantial impact on dependants across a number of different visa routes, who are not required to work under existing immigration rules now facing salary threshold and contribution assessment. Submissions argue the earned settlement and earned citizenship criteria do not recognise other important contributions such as through unpaid caring responsibilities and community roles. Several submissions note the potentially gendered impact of these reforms with women often taking on these roles and possible pauses from paid work to take maternity leave. Also, some submissions note difficulties in finding work, but the household still being stable. Submissions recommend earned settlement and earned citizenship should consider the household as a unit and for families qualifying periods and applications to remain on the same timeline.
58. A small number of submissions note where they may have entered under one route but be eligible for more than one, and if under reforms another route would be better to enable move to alternative route and retain contribution and qualifying route from initial route.
59. The proposed salary thresholds are raised across submissions, particularly in relation to unrealistic thresholds, in certain sectors to certain roles, and relating to regional disparities whether in devolved nations or across England, where salary expectations are different. Those in devolved nations also noted the different income tax thresholds. Others note the need to consider wider financial resources such as savings, international income, property and pensions. A number of the BN(O) visa route submissions explain this route requires evidence of self-sufficiency before arrival.
60. A number of submissions criticise the use of Standard Occupation Codes (SOCs) in classifying skill level as they are too broad and there is overlap between them. They are considered an arbitrary measure. Suggestions include that salary could be used instead as there will be roles below and above RQF level 6 that earn the same salary.
61. Submissions note concern regarding the proposal to increase the qualifying settlement period to 15 years for those in a role below RQF level 6 on the Skilled Worker route. Many reference that Government data shows over 50% of RQF level 3-5 workers are net contributors across their lifetime. Several submissions note that there are many valuable contributory roles such as carers which would now fall under the longer qualifying period. Worries were raised regarding the impact on workforces, especially those with sector

shortages, if roles are now no longer seen a valued and skilled. A key concern is that arriving on a role below RQF level 6 would lock in the extended qualifying period, submissions recommend that the RQF level should be the level upon applying for ILR.

### *Devolved nations and Common Travel Area*

62. A small number of submissions note that devolved nations may have different immigration needs to support the workforce and the population more widely and query whether the proposed reforms are suitable for competing needs.

### **Historical and International Context**

63. Many submissions argue the proposed reforms would damage the UK's international reputation. Submissions set out that the reforms are inconsistent with the UK's principles of fairness, transparency and predictability, and the previous focus on term of residence rather than contribution.
64. Submissions note that the UK has previously encouraged international workers under a variety of routes, so the reforms are seen as a reversal to this approach.
65. Submissions highlight the possible impact of the reforms on the UK's global competitiveness, and its ability to attract and retain global talent. If uncertainty is introduced through retrospective implementation, skilled workers will seek out more reliable and stable routes, with several submissions anticipating a brain drain and the resulting impact on the UK's economy.
66. Submissions also discuss the UK's need for international workers, noting if reforms do reduce the number of migrant workers this could have a knock-on impact on workforce and in particular in areas where there are sector shortages, sectors referenced include the NHS and construction.
67. Several submissions detail international settlement routes that are less costly and more flexible than the current proposals. Frequent examples were:
- Canada—3-year pathway and under certain pathways enables permanent residency before moving, or within 6-18months.
  - Australia—4-year pathway
  - USA—approx. 5-year pathway and guarantor process
  - Germany—considers student and graduate years in visa system
  - France - considers student and graduate years in visa system
  - Ireland
  - Europe more generally
  - New Zealand
  - Middle East

Submissions highlight that internationally, in particular Canada, Germany and Australia, immigration changes are typically not applied retrospectively, transitional protections are implemented, and earnings-based criteria consider sectoral differences.

*Home Office capacity*

68. Submissions raise concerns regarding the ability of the Home Office to manage the complexity, retrospective application, and administrative burden of the proposed reforms. Submissions note the historic failings such as the Windrush scandal, and current issues such as delays, poor communication and errors.
69. Some submissions note that the proposed reforms will increase Home Office workload due to new evidential requirements and repeat visa applications over extended qualifying periods, with a number that suggest prospective application rather than retrospective application would limit the immediate burden. Others propose Home Office systems should be improved and challenges addressed. Alternatively, submissions suggest a scrutiny mechanism for independent oversight should be established, such as a regulator. Some submissions suggest it should be considered whether the responsibility for integration and citizenship should be removed from the Home Office.

**The Citizenship Process***Complexity of ILR and Citizenship process*

70. Several submissions reference the complexity, stress and expense involved in the existing ILR and citizenship processes, notwithstanding the proposed reforms. Submissions note the difficulties and costs of accessing legal support with these processes. Many submissions discuss the increased complexity under the proposed reforms.
71. As set out in the section on the Home Office, many submissions reference the delays and errors in the current system, and the anticipated increase with proposed reforms.
72. Many felt the frequent changes to the processes, including those recently announced, make ILR and Citizenship feel unattainable and continues uncertainty.

*Costs of process*

73. Compared to international comparators, the UK system is seen as expensive. A number of submissions note the recent increases in visa application fees and in the IHS. Some submissions call for costs to be reduced.
74. Differing estimate costs are outlined across submissions, varying on the individual circumstances of submitters and how reforms would impact them.
75. A basic breakdown of costs

<b>Existing visa costs and renewals</b>	<b>Variable depending upon route</b>
IHS	£1,035 per year (lower for students, their dependants and those under 18 at time of application)
Life in the UK test	£50 (first time)
ILR fee	£3,226 per applicant (including dependants)

Existing visa costs and renewals	Variable depending upon route
Naturalisation/Citizenship fee	£1,709
Ceremony fee	£130

76. Additional costs were outlined including legal and administrative costs, medical evidence, biometrics, English and Advanced English tests costs, 'priority' or 'super priority' processing fees, travel costs, fees for transferring money to the UK and currency conversion costs.
77. Submissions note the proposed extensions in qualifying period results in an exponential increase in costs that had not been anticipated and budgeted for.
78. A submission noted in Europe ILR application costs are substantially lower; Germany- €109, France - €225, Netherlands - €171, and Ireland is under €1,000.
79. Canada's permanent residence costs are set out as CAD\$2,385 (approx. £1,400) and citizenship is CAD\$630 (£370).
80. Examples given include:
- For a Skilled Worker visa holder—£1,200 for initial 3 year Skilled Worker visa, £1,200 for 2 year extension, £3,000 for IHS at former rate of £600 per year, £3,039 ILR application fee, £1,600 citizenship fee—a total of approximately £10,000, not including dependants which face similar costs and additional costs of tests and ceremony etc.
  - For a Skilled Worker visa holder on 5 year route estimates include £7,000-£8,000 for ILR with a further £5,000 for citizenship.
  - The increased costs under proposed are estimated at different amount with some submissions estimating that a family of four on Skilled Worker visa for a further 5 years would face an additional £14,000-£16,000 in costs, with another estimating the additional cost at £25,000-£30,000, others suggesting up to £40,000.
  - For the Ancestry visa route for one individual is estimated to cost between £8,000-£9,000 for ILR under the current rules, but as a result of reforms and the proposed salary thresholds would need to renew Ancestry visa for a full 5 years regardless of meeting salary threshold for a reduction from the new baseline qualifying period plus ongoing IHS costs so this would be £14,000-£15,000 total.
  - For the Appendix for International Armed Forces and International Civilian Employees visa for two parents and two children based on current system to cost over £20,000 for IRL and settlement.
  - For a spouse of a UK national for the proposed 10 year qualifying period it is estimated to cost approx. £20,000: IHS fee £10,350, Spouse visa out of country £2,064, Spouse visa in-country £1,407 x 3 =£4,221.00, Indefinite leave to remain £3,226 and Citizenship £1,839. A number of submissions noted the applications for leave to remain and IHS could continue indefinitely if do not meet the revised threshold.
  - Whereas another submission shared to join a spouse in Ireland there is an application fee of €100, with a requirement to get private health insurance for 1 year, and then after 5 years can apply for citizenship for €175 + €950 certification fee.

- On ECAA route submissions share it would cost £6,452 for two ILR applications. This route is not eligible for priority or super priority processing. Submissions also raise that under this route migrants can only be self-employed and cannot access public funds. £12,000 would be needed to cover temporary status costs until revised qualifying period.
81. Submissions also note that often migrants have changed route so have incurred previous costs on earlier routes.
  82. Some submissions note the ongoing costs for employers to continue providing sponsorship.
  83. Submissions raise that extending the qualifying period and salary thresholds extends uncertainty and the challenging aspects of the settlement process, such as additional visa fees, renewals and IHS costs that had not been anticipated or prepared for and the impact of this on saving to buy a house, pay education costs, possibly having children and considerations of retirement.

#### *Life in the UK Test*

84. Submissions suggest that the current Test does not reflect modern British life, with criticism that it is more of a memory test rather than equipping people with information on life in the UK. Suggestions for reform emphasis the need to focus on practical information on rights and responsibilities, British values and democratic participation. Some submissions set out that the Test is not an effective mechanism to assess commitment to the country and understanding of the culture.

#### *Points based system*

85. Some submissions note the current proposals focus on higher salaried roles, rather than lower paid but essential roles, such as carers would not be considered.

#### *Right or privilege*

86. This question is not frequently covered by submissions, those that do note that citizenship should be achievable. One submission shared that citizenship should not be seen as a reward but as the result of compliance with rules and contribution.

### **Applying for Citizenship and its impact on integration and social cohesion**

#### *Citizenship*

87. Submissions largely highlight Citizenship as pivotal to foster belonging and provide long-term security. Citizenship is also not subject to the possible policy changes that ILR can be. Submissions note Citizenship also provides greater flexibility and freedoms in terms of the ability to bring families together, enable democratic participation, and in terms of work, travelling for work or working abroad.
88. The question of Citizenship as a right or privilege did not produce consensus with a range of views shared. A number queried whether Citizenship is either. Several submissions note that it should still be achievable for those on lower salaries.

*Integration*

89. Submissions set out that over the course of existing qualifying periods migrants already positively integrate into society, contributing through their work, volunteering, civic engagement, socially, making friendships and involvement in the community. Several submissions share the complete integration of their children in settling into school, rapidly picking up the English language and making friends. For many they consider the UK home prior to receiving ILR or citizenship.
90. Other submissions discuss that integration cannot be fully realised until ILR and Citizenship have been achieved. Prior to these statuses being reached, temporary status fosters uncertainty which undermines integration. Many felt the extended qualifying periods proposed, potentially up to 20 years under some routes, would not increase integration or social cohesion, but rather weaken it.
91. Submissions note a range of views on the issue of an ‘integration problem’, some share there is not a widespread integration problem, whereas others feel a problem is created by the rhetoric surrounding immigration, and some note that there are challenges in certain areas.
92. Some submissions highlight that integration goes beyond the actions solely of migrants and involves the wider community, and access to services to support integration. A number of submissions note that support services are lacking, suggestions included an integration course or using community infrastructure.

**Can a system which emphasises high skills and English language afford to be more generous in terms of integration policy?**

*Language*

93. A number of submissions agree a level of English prior to arrival in the UK is acceptable, though some note that for particular routes this will not be suitable such as refugee or humanitarian. After arrival in the UK, the consensus is that the level of English required need to be realistic, accessible and affordable, with support provided to access English language support.
94. Submissions take a varied view on the English level needed, as this should be flexible depending upon the individuals concerned, such as some that raise that dependants might not need as high a level as supported by main applicant, the older generation may struggle with higher requirements, and another set out that English tests may not be needed for children who have been through school, GCSEs and A Levels, and university.
95. Submissions note that in Australia and Canada the main applicant’s English is assessed but not dependants, whereas the US does not assess language level.

## APPENDIX 6: FURTHER BACKGROUND INFORMATION

This appendix is intended to provide further background information to the report.

### Glossary

Throughout this report, we use the terms defined as follows by the Home Office and United Nations:

- **Application fees:** when a person makes an application for most types of UK immigration status, they are required to pay application fees. This fee varies depending on the application type (e.g., work, family, citizenship) and is not refunded if the application is refused.
- **Asylum claimant/seeker:** someone who makes a claim to be recognised as a refugee under the Refugee Convention. When a person claims asylum in the UK, they are not normally allowed to work whilst their claim is being considered. They are instead provided with accommodation and support to meet their essential living needs if they would otherwise be destitute. NB not all asylum seekers will go on to be recognised as refugees.
- **British national (Overseas):** someone who was a British Overseas Territories citizen by connection with Hong Kong and either registered as a BN(O) before 1 July 1997 or did not register but had no other nationality or citizenship. The BN(O) visa route was introduced on 31 January 2021 for BN(O)s and their family members, after the Chinese Government imposed national security legislation on Hong Kong in in 2020. In February 2026, the Government expanded BN(O) eligibility so that adult children of BN(O) status holders, who were under 18 at the 1997 handover of Hong Kong to China can now apply for a BN(O) visa independently, rather than needing to apply as part of a BN(O) household or with a parent.<sup>356</sup>
- **Citizen (British) and citizenship:** those with UK nationality usually through a connection with the UK: birth, adoption, descent, registration, or naturalisation. British nationals have the right of abode in the UK. NB: Many legal scholars identify a distinction between nationality and citizenship. Technically a British citizen is the most common form of a British national. Throughout the report, we use citizen and citizenship as defined above and as understood in common English parlance.
- **Cohesion:** how migration affects neighbourhoods, defined by people's perceptions of how people get along with each other in their local area or neighbourhood.
- **Emigration:** From the perspective of the UK, the act of moving from the UK to another country, so that the country of destination effectively becomes his or her new country of usual residence. A person who stays away from the UK for a period of three to twelve months is considered a short-term emigrant, whereas a person who stays away from the UK for a period exceeding twelve months is considered a long-term emigrant.

<sup>356</sup> Home Office, *Hong Kongers offered new lives as UK expands safe and legal routes*, February 2026

- English for Speakers of Other Languages (ESOL): a form of language teaching that is designed to help non-native English speakers living in the UK develop their English listening, reading and writing skills. There are five levels of ESOL course, which range from entry-level courses to Level 2 courses, equivalent to an English GCSE at grades 9 to 4 (or A\* to C).
- EU Settlement Scheme (EUSS): a Home Office scheme created as part of the EU-UK Withdrawal Agreement. It was designed to broadly maintain the rights that EU citizens and their non-EU family members who were living in the UK by 31 December 2020 had before Brexit by giving them a new immigration status.
- Immigration: From the perspective of the UK, the act of moving from one's country of usual residence to the UK, so that the UK effectively becomes his or her new country of usual residence. A person who moves to the UK for a period of three to twelve months is considered a short-term immigrant, whereas a person who moves to the UK for a period exceeding twelve months is considered a long-term immigrant.
- Immigration health surcharge (IHS): a payment of that individuals must make when applying for certain types of visas, such as work and family visas. The surcharge is paid upfront and must cover the full duration of the visa, at a rate of £1,035 per year, or £776, for children and international students (prices correct as of May 2026).
- Indefinite leave to remain (ILR): a grant of settlement which gives an individual the right to work, study and travel into and out of the UK without restriction, as well as access to state benefits and to register their UK-born children as British citizens. NB: The Government use settlement and ILR interchangeably, as do we throughout the report.
- Integration: Individual and group outcomes compared to the societal average. It is about understanding the trajectories of migrants in a range of economic and social spheres, including employment, housing, health, social interaction, and marriage.
- Life in the UK test: a multiple-choice test that most people need to pass in order to apply for Indefinite leave to Remain or British citizenship. The test covers the UK's history, culture, tradition, structures and ways of life. To pass, an individual must score 75% or more.
- Migrant: someone who is moving or has moved away from his or her usual place of residence, regardless of their legal status or reason for moving. In this report, we define migrants as people living in the UK who have relocated from another country and have never held British citizenship. A person who moves for a period of three to twelve months is considered a short-term migrant, whereas a person who moves for a period exceeding twelve months is considered a long-term migrant.
- Migration: the movement of persons away from their place of usual residence. In this report, we define migration as movements across international borders, rather than movements within the UK.
- Migration Advisory Committee (MAC): an independent public body, sponsored by the Home Office, that advises the Government on migration issues.

- Nationality: There are currently 6 forms of British nationality, with a British citizen the most common. In the UK, nationality is often used interchangeably with citizenship. NB: Many legal scholars identify a distinction between nationality and citizenship
- Net migration: the difference between the number of people coming to live in the UK (immigration) and the number of people leaving to live elsewhere (emigration). When more people are coming to the UK than leaving, net migration is above zero and so adds to the UK population.
- No recourse to public funds (NRPF) condition: a rule that prevents certain visa holders from claiming most benefits, tax credits or housing assistance that are paid by the state. Support that is considered public funds includes, but is not limited to: Universal Credit, Housing Benefit, Income Support, Personal Independence Payment, Child Benefit. Support that is not considered public funds includes, but is not limited to: Retirement Pension, Statutory Maternity Pay, and Statutory Sickness Pay. NB: Even if a person is subject to NRPF conditions, councils have statutory duties to provide accommodation and financial support to safeguard and promote the welfare of families, adults with care needs, and care leavers who are at risk of homelessness, or have insufficient income to meet their basic living needs.
- Refugee: someone who meets the definition under the 1951 Refugee Convention, having been forced to flee his or her country because of a well-founded fear of persecution for reasons of race, religion, nationality, political opinion or membership in a particular social group. Individuals who are granted asylum, or resettled in the UK, have refugee status. Those with refugee status can access support on the same terms as those with ILR, so do not have an NRPF condition.
- RQF levels: the difficulty level of different educational qualifications, ranging from entry level to level 8. GCSE qualifications are equivalent to level 2, while A-Levels are equivalent to level 3 and an undergraduate degree is equivalent to level 6.
- Settlement: a grant of Indefinite Leave to Enter (on arrival) or Indefinite Leave to Remain (after entry). NB: The Government use settlement and ILR interchangeably, as do we throughout this report.
- Temporary visa: various categories of visa that allow the holder to live in the UK for a temporary period, including work and family visas but not visitor visas. Temporary visas must be usually renewed in order for the holder to extend their permission to stay in the UK, and most holders cannot access welfare benefits and housing support.

Source: Home Office, *User Guide to: Immigration system statistics*, May 2026

### Key characteristics of migrants in the UK

1. The below section draws heavily on the work of Georgina Sturge and Denis Kierans of the Migration Observatory, in their 2025 briefing on *Who migrates to the UK and why?*<sup>357</sup> The Committee is grateful to them for the permission to reproduce their work here.

*Composition of migrants*

2. Between 2021 and 2024, the number of people migrating to the UK from non-EU countries increased. In the four years from 2021 to 2024, non-EU migrants accounted for eight out of every ten people who migrated to the UK. Prior to 2021, and the end of EU freedom of movement, the majority of UK migrants came from the EU. In addition to the introduction of the post-Brexit immigration system, other factors such as an increased in recruitment of international students, and the opening of humanitarian routes such as the Ukraine, Afghan, and Hong Kong schemes, has increased non-EU migration.
3. The 2021 census showed that the most common foreign countries of birth of people living in England and Wales were: India (920,000 people); Poland (740,000); Pakistan (620,000); and Romania (540,000). Between 2021 and the end of 2024, Indian was also the most common single nationality of people migrating to the UK. Around 850,000 Indian nationals arrived during this time, making up 24% of non-EU arrivals, and 19% of all nationalities. Along with Indian, the five nationalities granted the most residence visas between 2005 and 2024 were Chinese, Pakistani, Nigerian, and American. Nigerian and Pakistani entered the top five nationalities since 2021, in both cases as a result of increased grants of study and work visas.
4. In relation to why people migrate to the UK, the main reasons are for work or for study, with work having been the more common reason in most years since 1990. There were two periods in which study, which refers to people coming to the UK for higher education, was the most common reason: the first between 2009 and 2012, after which the government introduced policies to restrict study visas, and more recently between 2019 and 2022, and again in 2024. The recent rise reflects a policy in the university sector to recruit more international students, in the context of a tighter funding environment.
5. In 2020, the Government introduced a health and care visa route—a subcategory of the skilled worker route—to attract professionals in this industry to the UK. This route was initially primarily used to recruit nurses, Following a sustained period of high vacancies in the care sector, in February 2022, the route opened to care workers in low-qualification, low-paid roles who, like others on the skilled worker route, were initially allowed to bring dependants. In 2023, 348,000 people were granted visas under the health and care route, making it the largest work category and the second largest visa route overall, after international study.
6. Nationality data for the health and care route shows that Indians, Nigerians, and Zimbabweans accounted for nearly two-thirds (63%) of people admitted on the route between 2021 and 2024. Other notable countries of nationality were Ghana, Pakistan, and the Philippines. During this time, there was a high ratio of dependants to main applicants on the health and care route. In 2023, dependants outnumbered main applicants at a ratio of around 4:3. The top nationalities coming under the route also had some of the most dependants relative to main applicants. Two-thirds of Nigerians coming on the route have been dependants rather than main applicants. Following concern about high numbers bringing dependants, care workers were banned from bringing dependants from March 2024. Current visa holders could still apply to have dependants join them, so while the number of main applicants on the health and care route fell by four-fifths between 2023 and 2024, the

number of dependants fell by just over half. In July 2025, the care worker visa route closed entirely to new applicants.

7. In 2023, over half (53%) of visas issued for work and study were for dependants rather than main applicants. This amounted to around 421,000 people who were granted entry as dependants in that year, 191,000 of whom (45%) were children. These numbers and proportions were highly unusual—between 2005 and 2020, the number of dependants coming on these routes was, on average, 64,000 per year and 19% of the total.
8. The number of dependants coming with students also increased between 2021 and 2023 before a similar policy change brought this down again. The number of dependants was highest in 2023, at around 140,000 to 460,000 main applicants or around 24% of the total number of people being granted entry for study reasons.
9. In relation to those coming on humanitarian routes, in the four years from 2021 to 2024, twice as many people were granted residence in the UK than in the previous twenty years combined. This was due to a combination of factors, notably the launch of the Ukraine schemes in 2022, Afghan resettlement schemes in 2021, the Hong Kong BN(O) route in 2021, and a rise in asylum applications and grants during the same period.
10. The recent addition of these new routes also means that migration for protection made up a larger share of overall migration in 2022 than in previous years. In that year, when humanitarian migration was at its highest, 278,000 people are estimated to have arrived in this category, equivalent to 23% of non-British migration. While figures are not available for many earlier years, they do show a significant rise since 2019, when humanitarian reasons accounted for 7% of overall non-British immigration.
11. In terms of settlement, family members are more likely to settle permanently in the UK than people who come for work or study. Among people granted an initial visa to come to the UK in 2019, for example, 89% of family visa holders still had valid leave to remain five years later at the end of 2024, compared with 45% of work visa recipients and 25% of those who had been granted study visas. Only migrants who arrived on protection routes showed a higher likelihood of settling (95%).

## Impact of migrants on public services and finances

### *Fiscal impact*

12. The MAC has recently reviewed the lifetime net fiscal impact of migrants who entered the UK in the 2022/23 financial year on different visa routes. It found that, on average, migrants would have the following impacts:
  - Skilled Worker (non-health and care) main applicants: £689,000.
  - Health and Care (excl. care workers) main applicants: £166,000.
  - Skilled Worker (non-health and care) dependants: £3,000
  - Care worker main applicants: -£36,000.
  - Care worker dependants: -£67,000

- Partners of British citizens: -£109,000.<sup>358</sup>
13. These differences in lifetime net fiscal impacts can be explained in large part by differences in earnings. A May 2025 Home Office analysis<sup>359</sup> found that, in the 2023/24 financial year, the median earnings of Skilled Workers were £56,600, while Health and Care workers earned £30,900. The partners of SW and H&C workers had lower median earnings (£30,200 and £22,100, respectively). People granted family visas had the lowest median earnings, at £20,200.<sup>360</sup>
  14. There is currently no analysis of refugees' net fiscal impact. However, they are likely to have a more negative impact than the groups mentioned above, due primarily to their low employment rate.<sup>361</sup>

### *Impact on the Health Service*

15. In its 2018 report,<sup>362</sup> the MAC assessed the link between migration and healthcare demand. Individuals' country of birth is not recorded when they use NHS services, making it difficult to assess the extent to which migrants use the NHS. However, the MAC estimated that non-UK-born individuals accounted for 11% of health expenditure, compared to 14% of the population. Earlier evidence, for the period 2001 to 2008, found that migrants were 'about half as likely' to have a hospital admission as the general population after controlling for age and gender.<sup>363</sup> These results are likely explained by the fact that migrants are, on average, younger than locals, and those who migrate tend to be healthier (although their health outcomes converge with those of locals over time).<sup>364</sup>
16. One exception is maternity services, where non-UK-born individuals are overrepresented in healthcare demand—just over one-third of births in England and Wales in 2024 were to non-UK-born mothers.<sup>365</sup> In 2018, the OBR estimated that £3,300 per annum is spent on each baby under 1 year old.<sup>366</sup>
17. Other analyses have examined the impacts of migration on the quality of healthcare provision. One academic study<sup>367</sup> found that migration reduced waiting times for outpatient referrals between 2003 and 2012 and did not have a statistically significant effect on waiting times in A&E or elective care. The authors argued that this could be explained by 'outmigration' (i.e., locals moving to other parts of the UK) and the fact that migrants tend to be healthier.<sup>368</sup>

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358 Migration Advisory Committee (MAC), *Annual Report 2025*, December 2025

359 Home Office, *Sponsored Work and Family visa earnings, employment and Income Tax*, May 2025

360 *Ibid.*

361 Home Office, *How many refugees are in employment?*, November 2025

362 Migration Advisory Committee (MAC), *EEA Migration in the UK: Final report*, September 2018

363 Adam Steventon, Martin Bardsley, 'Use of secondary care in England by international immigrants', *Journal of Health Services Research & Policy*, vol 16, issue 2, (2011) <https://doi.org/10.1258/jhsrp.2010.010097>

364 Migration Observatory, University of Oxford, *The health of migrants in the UK*, August 2020

365 Office for National Statistics, *Parents Country of Birth*, May 2026

366 Migration Advisory Committee (MAC), *EEA Migration in the UK: Final report*, September 2018, p 92

367 Osea Giuntella, Catia Nicodemo, Carlos Vargas-Silva, 'The effect of immigration on NHS waiting times', *Journal of Health Economics*, vol 58, (March 2018) pp 123–143: <https://doi.org/10.1016/j.jhealeco.2018.02.001>

368 Migration Advisory Committee (MAC), *EEA Migration in the UK: Final report*, September 2018

18. Using data from 2009 to 2017, the MAC found<sup>369</sup> ‘little evidence for any effect of [non-UK born individuals] on GP satisfaction with the possible exception of EU13+ migrants, where the impact seems to be positive.’<sup>370</sup>
19. Non-UK nationals also account for a sizable portion of the NHS workforce—21% in June 2025, according to the House of Commons Library<sup>371</sup>. Doctors (36%) and nurses (30%) were more likely to report a non-UK nationality than clinical support staff (17%) or ambulance staff (8%).<sup>372</sup> Skills for Care data shows that 29% of posts in adult social care were filled by non-UK nationals in 2024/25, up from 16% in 2021/22.<sup>373</sup>

### *Education*

20. Migrants contribute more to the demand for primary and secondary education than to its supply. According to the 2024 Annual Population Survey, 27% of school-aged children (i.e., 4–16) were either non-UK born or had a non-UK-born parent. By contrast, 6% of primary school teachers and 12% of secondary school teachers were non-UK born.<sup>374</sup> The MAC produced similar figures using 2017 data.<sup>375</sup>
21. Limited evidence suggests that children who do not speak English as a first language (EAL pupils) do not adversely affect the educational attainment of native English speakers. One academic study from 2013 reported no impact on educational outcomes for UK-born pupils,<sup>376</sup> while the MAC identified a positive correlation between the share of EAL pupils and the percentage of native English speakers achieving their target level in SATS scores or achieving at least five A\* to C grades at GCSE. According to the MAC, one explanation may be that, overall, EAL pupils perform better at both primary and secondary school levels than native English speakers.<sup>377</sup>
22. The MAC also found no statistically significant relationship between the share of pupils with English as an additional language and the percentage of parents who received their first preference of school.
23. In higher education, the share of total university income from international tuition fees has risen significantly, from 5% in the mid-1990s to 23% in the 2023/24 academic year. Tuition fees paid by international students cross-subsidise shortfalls in other parts of universities’ budgets, driven by reductions to teaching grants, the freezing of tuition fee caps, and rising costs.<sup>378</sup>

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369 *Ibid.*, p 94

370 Osea Giuntella, Catia Nicodemo, Carlos Vargas-Silva, ‘The effect of immigration on NHS waiting times’, *Journal of Health Economics*, vol 58, (March 2018) pp 123–143: <https://doi.org/10.1016/j.jhealeco.2018.02.001>

371 House of Commons Library, *NHS staff from overseas: statistics*, November 2025

372 *Ibid.*

373 Skills for Care: Workforce Intelligence, *Workforce nationality and international recruitment*, October 2025

374 UK Data Service, *Annual Population Survey* [accessed May 2026]

375 Migration Advisory Committee (MAC), *EEA Migration in the UK: Final report*, p98, September 2018

376 Charlotte Geay, Sandra McNally, ‘Non-native Speakers of English in the Classroom: What Are the Effects on Pupil Performance?’, *The Economic Journal - Wiley Online Library*, vol 123, issue 570, (2013), pp F281-F307: <https://doi.org/10.1111/ecco.12054>

377 Migration Advisory Committee (MAC), *EEA Migration in the UK: Final report*, p100, September 2018

378 House of Commons Library, *International Students in Higher Education*, June 2025

*Housing*

24. Migration contributes to housing demand through population growth, and if demand increases more quickly than housing supply, this will lead to higher housing costs. Most UK studies indicate that migration raised house prices. For example, in 2018, the MAC found that a one percentage point increase in the share of the local population who are migrants raises house prices by 1%<sup>379</sup> (similar to estimates from MHCLG<sup>380</sup> and the OBR<sup>381</sup>). The MAC noted that the impact on house prices was larger in local authorities with more restrictive planning practices.<sup>382</sup>
25. One significant gap in the evidence base concerns the impact of migration on rental prices. Migrants have lower homeownership rates than locals—particularly after arrival—and so this is where prices are likely to be affected most.<sup>383</sup>
26. Regarding social housing, local authorities do not prioritise assistance based on applicants' nationality or immigration status—instead, priority is determined by need (e.g., if an individual is at risk of homelessness or needs to move for welfare reasons). According to the 2021 census for England and Wales, 7% of people living in social housing held a non-UK passport, compared with 10% of the population. The share of non-UK nationals in social housing has since increased.<sup>384</sup>

*Crime*

27. Research indicates there was no relationship between immigration and violent crime rates in England and Wales in the pre-Brexit period.<sup>385</sup> This finding holds across different migrant groups, including asylum seekers and the EU-born. One study has examined the effect on drug crimes and similarly found no impact.
28. The results for property crime are more varied. There is a consensus that migration from EEA countries did not lead to higher rates of property crime in the early 2000s—indeed, one study suggests that an increase in the share of the local population born in 2004 EU accession countries (EU8) led to a decline in property crime. However, the same study also found that a rise in the asylum seeker share of the population led to an increase in the rate of property crime. The authors argue that the different impacts on property crime stem from the fact that EU8 migrants were allowed to work, whereas asylum seekers were not.<sup>386</sup>

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379 Migration Advisory Committee (MAC), *EEA migration in the UK: Final report*, September 2018, p 75

380 Ministry of Housing, Communities & Local Government, *Analysis of the determinants of house price changes*, April 2018

381 Office for Budget Responsibility, *Working Paper No.6 – Forecasting house prices*, July 2014

382 Migration Advisory Committee (MAC), *EEA migration in the UK: Final report*, September 2018, p 75,

383 Migration Observatory, University of Oxford, *Migrants and Housing in the UK*, December 2024

384 *Ibid.*

385 Brian Bell, Francesco Fasani, Stephen Machin, 'Crime and Immigration: Evidence from Large Immigrant Waves', *The Review of Economics and Statistics*, vol 95, issue 4, (2013), pp 1278–1290: [https://doi.org/10.1162/REST\\_a\\_00337](https://doi.org/10.1162/REST_a_00337); Laura Jaitman, Stephen Machin, 'Crime and immigration: new evidence from England and Wales', *IZA Journal of Migration*, vol 2, September 2013 <https://doi.org/10.1186/2193-9039-2-19>, Francesco Fasani, Giovanni Mastrobuoni, Emily G. Owens, Paolo Pinotti, *Does Immigration Increase Crime?* (Cambridge University Press, 2019); Migration Advisory Committee (MAC), *EEA migration in the UK: Final report*, September 2018, p 108

386 Brian Bell, Francesco Fasani, Stephen Machin, 'Crime and Immigration: Evidence from Large Immigrant Waves', *The Review of Economics and Statistics*, vol 95, issue 4, (2013), pp 1278–1290: [https://doi.org/10.1162/REST\\_a\\_00337](https://doi.org/10.1162/REST_a_00337)

29. The Migration Observatory at the University of Oxford has compared conviction and incarceration rates in England and Wales for UK and non-UK citizens in the post-Brexit period. It found that 12.4% of the prison population in June 2025 were non-UK nationals, while they accounted for 13% of cautions and convictions issued in 2024.<sup>387</sup> The Annual Population Survey suggests that 12% of the 16+ population were non-citizens in 2024; however, this figure is likely an underestimate.
30. It notes that conviction and incarceration rates vary substantially by nationality, observing that certain nationalities—including Albanians, Iranians, and Afghans—are among the most common non-UK nationalities in the prison population, but have relatively small populations living in the UK. They are therefore clearly overrepresented in prisons, even if it is difficult to calculate precisely how much.

### *Universal Credit*

31. According to the Migration Observatory, in March 2025, 15% (around 1 million) of individuals in receipt of a Universal Credit payment were non-UK (and non-Irish) nationals aged 16 or over at the time their Universal Credit claim began. This compares to just over 13% of non-UK or Irish nationals in the wider working-age population, according to the 2024 Annual Population Survey (which is expected to undercount some migrants, particularly recent arrivals).<sup>388</sup> In the year ending March 2025, the Department for Work and Pensions made £65.4 billion in Universal Credit payments, of which 10% (£6.25bn) was paid to households with at least one EEA-national claimant and 8% (£5.31bn) to households with at least one non-EEA-national claimant. These figures cannot be combined, as some households comprise both EEA and non-EEA claimants. They also include payments to UK and Irish claimants living in the same household as an EEA or non-EEA claimant.
32. As noted by the Migration Observatory, the share of migrants subject to NRPF will likely fall in the second half of the decade, as people who came to the UK in the early 2020s—when net migration was unusually high—become eligible to acquire settlement. This may lead to an increase in the share of non-UK nationals claiming Universal Credit. Separately, the Migration Observatory estimated that 66% of people with refugee status at the end of 2024 were claiming Universal Credit (112,500 of 171,200 people). This figure does not include refugees who subsequently acquired ILR.

### *Labour market impacts*

33. A large body of research has examined the impact of migration on locals' wages and employment, both in the UK and in other high-income countries. These studies have consistently found only small impacts, if any.<sup>389</sup> However, these impacts are not evenly distributed: the lowest-paid workers tend to lose out, while the highest-paid gain. This is because, after arrival, some migrants 'downgrade' and work in jobs towards the bottom of the earnings distribution (e.g., due to limited English language skills or difficulty getting

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387 Migration Observatory, University of Oxford, *How do conviction rates and prison populations differ between British and foreign nationals?*, September 2025

388 Migration Observatory, University of Oxford, *Migrants in the UK labour market: an overview*, May 2026

389 Migration Advisory Committee (MAC), *EEA migration in the UK: Final report*, September 2018, p 108

foreign qualifications recognised).<sup>390</sup> That puts them in closer competition with lower-paid UK-born workers.

34. One reason the labour market effects are small is that migration not only affects the supply of workers, but the demand for workers, too. Migrants are also consumers,<sup>391</sup> meaning demand for goods and services increases.<sup>392</sup> In addition, several studies indicate that firms respond to immigration by adopting more labour-intensive production techniques. This increase in labour demand offsets the increase in labour supply.<sup>393</sup>
35. Related work has focused on migrants' labour market progression over time. In general, the pay gap between UK-born and non-UK-born workers closes over time, as migrants 'upgrade' into jobs which more closely match their skills and experience.<sup>394</sup> This is not always the case, however—a MAC study found that migrants from 2004 EU accession countries had limited earnings progression over the period 2002 to 2019.<sup>395</sup>

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390 Christian Dustmann, Tommaso Frattini, Ian P. Preston, 'The Effect of Immigration along the Distribution of Wages', *The Review of Economic Studies*, vol 80, Issue 1, (2013), pp 145–173: <https://doi.org/10.1093/restud/rds019>

391 Ethan Lewis, 'How Immigration Affects Workers: Two Wrong Models and a Right One', *Cato Institute Journal*, vol 37, Issue 3, <https://www.cato.org/cato-journal/fall-2017/how-immigration-affects-workers-two-wrong-models-right-one>

392 Christian Dustmann, Tommaso Frattini, Ian P. Preston, 'The Effect of Immigration along the Distribution of Wages', *The Review of Economic Studies*, vol 80, Issue 1, (2012), pp 145–173: <https://doi.org/10.1093/restud/rds019>

393 Rowena Gray, Giulia Montresor, Greg C. Wright, 'Processing immigration shocks: Firm responses on the innovation margin', *Journal of International Economics*, vol 126, (2020) <https://doi.org/10.1016/j.jinteco.2020.103345>

394 Sara Lemos, 'Immigrant economic assimilation: Evidence from UK longitudinal data between 1978 and 2006', *Journal of International Economics*, vol 24, (2013), pp 339–353: <https://doi.org/10.1016/j.labeco.2013.09.009>

395 Migration Advisory Committee (MAC), *Immigrant downgrading: new evidence from UK panel data*, March 2024