

# AdviceUK Submission

## *A Fairer Pathway to Settlement*

### **Executive Summary**

AdviceUK strongly opposes the proposed earned settlement framework set out in this consultation. As the largest network of independent advice services, we are concerned that the proposals will lead to a number of harmful consequences. These include significantly increasing demand at already over-stretched advice services; entrenching insecurity for migrants, refugees, and asylum seekers and their families; punishing people making valuable contributions to British society; and fuelling the fire of hostility that immigrants, refugees, asylum seekers and the charities that support them, are facing. The framework places disproportionate weight on earnings, penalises vulnerability, and undermines safeguarding and workforce stability across the advice and voluntary sectors. The proposals will fuel and legitimise hostility towards migrants, refugees and asylum seekers, and the advice organisations that support them. It will also create a system that is more complex, costly and harmful.

### **1. Introduction**

[AdviceUK](#) is the UK's largest network for independent advice services. We represent over 700 organisations across Britain. Collectively, our members provided advice to around 2.8 million people last year on issues such as welfare benefits, debt, employment rights and immigration. Our members' services are embedded in their communities, often acting as the first point of contact for people experiencing multiple disadvantages. Roughly 120 organisations in our membership provide advice to immigrants, refugees and asylum seekers. Our members' work includes regulated immigration advice and related issues, often acting as the first point of contact when immigration status intersects with homelessness, destitution, benefit access, family breakdown or exploitation.

For this consultation, we have drawn on insights from a roundtable discussion convened by AdviceUK in January 2025, which brought together 22 member organisations from across England providing frontline immigration advice to discuss the earned settlement framework. These organisations have experience supporting asylum seekers, refugees, long-settled migrants, families with no recourse to public funds, survivors of trafficking and exploitation, and people with long-term health conditions and disabilities. Many of these organisations have requested their contribution to our submission to be anonymised.

#### **1.1 Impact on advice services**

Changes to settlement rules have direct and far-reaching consequences for the people our members support and the ability for advice services to meet rising demand as the complexity of the proposals in this consultation will lead to more clients needing advice. Data from AdvicePro, a case management software used by advice services, shows that since April 2024 there have been over 77,000 cases related to immigration and asylum, a 21% increase from 2023, which highlights the scale of need and pressure facing advice provision. Our members tell us that they are concerned that demand will increase significantly if the reforms are taken forward. Since the publication of the May 2025 *Restoring Control White Paper*, our members have begun hearing from clients who are taking action due to anxiety about the proposed reforms, even though the measures are not yet

law. For example, AdviceUK member Refugee and Migrant Forum of Essex and London (RAMFEL) have supported a mother of three who, one year away from indefinite leave to remain, cancelled the universal credit support for her autistic daughter over fear that the proposals would add twenty years to her qualifying period.<sup>1</sup>

AdviceUK's research shows that the wider advice sector is already under severe strain. Our Advice Saves report (2024) shows that 90% of advice sector staff reported an increase in demand over the previous year and more than half (55%) reported they were not confident they can meet demand.<sup>2</sup> Furthermore, 61% said they were likely to reduce or cut services due to financial constraints, 88% said that recruiting and retaining staff is a significant hurdle, and nearly 1 in 5 staff rated their wellbeing as 'very poor' or 'poor'.<sup>3</sup> All of these issues demonstrate an industry at breaking point. Indeed, just 11% of advice services felt extremely confident they could continue operating beyond the next year.<sup>4</sup> At the roundtable, members repeatedly described immigration advisers experiencing burnout and vicarious trauma, with some reporting plans to leave the sector entirely. Members emphasised that further policy complexity and prolonged settlement timelines would significantly exacerbate these pressures. Against this backdrop, proposals that extend settlement routes, increase complexity, and introduce new penalties and evidential requirements will have a disproportionate impact on advice services and the communities they serve.

## 1.2 A shift toward prolonged insecurity

Our overarching concern is that the earned settlement framework represents a fundamental shift away from predictable, time-limited routes to settlement towards a system characterised by prolonged uncertainty, increased conditionality and punishment. AdviceUK members have emphasised that the proposed model would leave people unable to plan their lives, sustain stable employment, or make long-term decisions about housing, family or education. By extending the standard qualifying period to 10 years and introducing potential extensions of up to 30 years, the proposals risk keeping people in precarious immigration status for much of their working lives. Members warned that this length of insecurity would result in repeated applications over decades, increasing the likelihood of errors, refusals and appeals, while generating sustained demand for advice in a system already operating beyond capacity.

Indeed, the National Audit Office (NAO) has said that, contrary to the Home Office's stated aims, the reforms are likely to increase backlogs and delays.<sup>5</sup> Furthermore, analysis by the Refugee Council estimates that the substantial increase in required refugee case reviews as a result of the changes could cost between £1.1 billion and £1.27 billion over the first decade of their implementation.<sup>6</sup> By contrast, evidence from the Commission on the Integration of Refugees indicates that an integration-focused asylum system can deliver benefits for both refugees and

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<sup>1</sup> AdviceUK member case study, available upon request.

<sup>2</sup> [Advice Saves Lives Report](#), 2024.

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

<sup>5</sup> NAO, [An analysis of the asylum system](#), 10 December 2025.

<sup>6</sup> Refugee Council, [Written Evidence submitted to the Home Affairs Committee: Settlement Reforms and Impact on Refugees](#), 2025.

wider society, with economic modelling showing that early access to English language learning and employment could generate a net benefit of at least £1.2 billion to the UK within five years.<sup>7</sup>

Frontline organisations have also raised serious practical concerns. An AdviceUK member in the East of England told us that the proposals “go against the UK government's ambitions in relation to economic growth, community cohesion, reduction of child poverty and violence against women and girls. They are also impractical in addition to being unfair.”<sup>8</sup> This organisation went on to say that the reforms will be difficult for their employees with refugee status, who make up more than a quarter of their staff, to manage.<sup>9</sup> Therefore, the proposals have serious implications on this organisation’s ability to “recruit and retain staff.”<sup>10</sup> Furthermore, the expected rise in administrative burden that the proposals will create is likely to further weaken staff retention and productivity.<sup>11</sup> Another member in London shared that “our immigration system should be built upon treating migrants with dignity and respect. As an organisation providing advice and support to refugees and migrants this will make our work much more difficult. We expect that people will be pushed further into destitution and organisations like ours will struggle to support this increased demand.”<sup>12</sup>

### 1.3 Earnings, Contribution and Inequality

The proposals also place excessive emphasis on earnings as a proxy for contribution. Members rejected the assumption that income accurately reflects contribution, noting that many frontline advice workers, carers and community workers themselves would not meet the proposed thresholds despite providing essential public work in advice services, charities, care, education and community support. Many others cannot work because of long-term health issues, disabilities or caring responsibilities. AdviceUK member RAMFEL told us that “the proposals create a two-tier settlement system that punishes people on lower incomes.”<sup>13</sup> If taken forward by the Government, this framework will entrench inequality.

We are also concerned about the proposed penalties linked to accessing public funds. Our members report that migrants are already avoiding lawful support due to fear of penalties, with serious implications for child welfare, domestic abuse responses and public health. Indeed, RAMFEL notes that “parents will have to choose between receiving state support and accepting a greatly increased route to settlement, or plunging themselves into destitution in the hope of securing a shorter settlement route.”<sup>14</sup> Lengthy penalties and extended qualifying periods are likely to exacerbate these harms.

Other frontline organisations echo these concerns. One AdviceUK member in London observed that “one thing that strikes us in particular is how unfair it is that migrants (those we represent) may

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<sup>7</sup> Commission on the Integration of Refugees, [From Arrival to Integration: Building Communities for Refugees and for Britain](#), (2024).

<sup>8</sup> AdviceUK member case study, available upon request.

<sup>9</sup> Ibid.

<sup>10</sup> Ibid.

<sup>11</sup> Ibid.

<sup>12</sup> AdviceUK member case study, available upon request.

<sup>13</sup> AdviceUK member case study, available upon request.

<sup>14</sup> Ibid.

be punished for exercising their legal right to benefits.”<sup>15</sup> Similarly, another member warned that “the impact of the proposals has not been properly assessed, as it is likely to lead to further destitution in marginalised communities and to counteract the integration of immigrant communities.”<sup>16</sup>

#### 1.4 Disproportionate impact on protected groups

Policies that delay or destabilise routes to settlement are likely to intensify harm for people already experiencing discrimination, poverty and other social welfare issues. This includes groups facing structural inequalities linked to disability and long-term physical or mental ill health, gender, race, caring responsibilities, and exposure to violence or exploitation. Where disadvantage is already entrenched, additional immigration insecurity compounds risk and reduces access to protection, stability, and support.

Mental-health deterioration associated with prolonged insecurity is likely to increase demand on the NHS, including crisis and emergency interventions, while frontline services absorb wider downstream pressures across legal advice, safeguarding, housing and social care. Repeated immigration status reviews can interrupt continuity of healthcare and disrupt eligibility for essential benefits, creating additional barriers for disabled people and those with long-term health conditions in accessing treatment, income support, and stable living conditions.

Evidence from a specialist LGBTIQ+ refugee support organisation further illustrates these pressures. African Rainbow Family has reported counselling uptake rising from 47% to 84%, alongside immigration legal-advice referrals increasing from 53% to 90% following the announcement of related immigration reforms on renewing refugee statuses every 30 months, placing significant strain on advice capacity and experienced experience casework provision.<sup>17</sup> We anticipate that the measures in this consultation would have a similar impact on demand.

Households subject to no recourse to public funds (NRPF) already face high levels of poverty and destitution, including elevated child poverty and reliance on emergency local authority support. Extending restricted eligibility is therefore likely to deepen hardship, increase safeguarding pressures and shift costs onto public services.

Immigration insecurity also has gendered impacts. Survivors of domestic abuse with insecure status face significant barriers to leaving abusive relationships where access to housing, income and specialist support is limited. Evidence from specialist women’s organisations in AdviceUK’s membership indicates that NRPF conditions and delayed settlement increase risks of prolonged abuse, destitution, and homelessness, undermining commitments to end violence against women and girls.<sup>18</sup>

#### 1.5 Hostile Environment, Safety and Workforce Impact

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<sup>15</sup> AdviceUK member case study, available upon request.

<sup>16</sup> AdviceUK member case study, available upon request.

<sup>17</sup> African Rainbow Family, [Earned Settlement Policy Brief for LGBTIQ+ Refugees and People Seeking Asylum in the United Kingdom](#), (2026).

<sup>18</sup> AdviceUK member case study, available upon request.

Finally, the consultation must be considered in the context of a wider hostile environment. AdviceUK members delivering immigration advice have reported rising hostility, abuse and threats towards staff and premises. We asked our members to tell us how they felt about the proposals. They used the following words to describe their feelings: “dehumanising,” “cruel” and “demoralised.” Members described incidents including harassment, intimidation, protests outside accommodation and offices, and online abuse. Several advisers stressed that these feelings are compounded by the personal impact on diverse workforces, many of whom have lived experience of migration and feel targeted both professionally and personally.

The measures set out in this consultation risk further inflaming tensions and will place additional pressure on an already overstretched workforce. They demonstrate that the Government’s current framework for designing the immigration system is at odds with the facts. Immigration is a net positive for the UK economically and socially. Immigration has been consistently shown to reduce public borrowing. The Office for Budget Responsibility (OBR) estimated in 2024 that an increase in net migration would deliver a net reduction in borrowing of £7.4 billion by 2028-29.<sup>19</sup> Furthermore, for the 2022/23 cohort alone, the Migration Advisory Committee (MAC) estimated a net lifetime fiscal contribution of £47.7 billion from skilled workers.<sup>20</sup> This excludes the health and care sector, which itself is underpinned by the hard work of immigrants.<sup>21</sup> International workers in social care have a lower turnover rate (25.9%) compared to domestic workers (38.9%), providing greater stability to the sector<sup>22</sup>. It is crucial that decision makers understand the value of immigration and do more to protect the wellbeing of immigrants, refugees and asylum seekers.

## 1.6 Overall position

For these reasons, AdviceUK urges the Home Office to reconsider the earned settlement framework. AdviceUK fundamentally rejects the proposals outlined in this consultation. However, if any reforms are to be introduced, comprehensive and strong exemptions, and transitional arrangements will be required. The Government must work closely with the advice and immigration sectors to ensure that any future immigration and settlement policies support fairness.

**We have responded to the relevant questions in the consultation below. If you would like to discuss our submission further, please contact [willem.vandeven@adviceuk.org.uk](mailto:willem.vandeven@adviceuk.org.uk).**

## 2. Earned Settlement

Question 1: Overall, how clear do you find the proposed changes to the settlement framework?

AdviceUK’s response: Somewhat unclear.

Significant operational details in the earned settlement framework are missing. The interaction between baseline requirements, accelerators and decelerators is insufficiently explained, particularly for applicants who may meet multiple criteria. This lack of clarity will make it difficult

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<sup>19</sup> OBR, ‘[The impact of migration on the fiscal forecast](#),’ *Economic and fiscal outlook – March 2024*, Box: 4.5, p. 125, 2024.

<sup>20</sup> Migration Advisory Committee, [The Fiscal Impact of Immigration: Static and Dynamic Estimates for the UK](#), December 2025.

<sup>21</sup> Ibid.

<sup>22</sup> Skills for Care and Workforce Intelligence, [The State of the Adult Social Care Sector and Workforce in England](#), 2025.

for applicants to understand their position and for advisers to provide accurate guidance. This gives credence to the NAO's assessment that the proposals are likely to increase backlogs and delays.<sup>23</sup>

Question 2: [If unclear] Which aspects of the proposed changes to settlement are not clear?

AdviceUK, and our members that we engaged with on this consultation, consider the following aspects to be unclear: the concept and purpose of earned settlement; which groups will be exempt from the 10-year qualifying period; how the framework would apply to dependents and children; and how discretion will be exercised and how consistency will be ensured. This uncertainty is likely to drive increased demand for advice and increase the risk of errors and non-compliance.

Question 3: Overall, to what extent do you agree or disagree with the proposed changes to the settlement framework?

AdviceUK's response: Strongly disagree.

We believe the proposals are disproportionate, risk significant unintended consequences on processing times and associated costs. They will increase insecurity and inequality while placing unsustainable pressure on advice services. Government needs to drop its proposals.

#### Mandatory Baseline Requirements

We are concerned about the discrimination demonstrated against those who have not been able to work, or work consistently at high pay, for three-five years. There are many legitimate reasons for a person not to meet this threshold and their value to British society should not be determined by this. For instance, those with caring responsibilities or disabilities that prevent them from being in-work. The elements of the framework that require no significant tax or NHS debt are similarly discriminatory. We want assurances that, if the proposals are taken forward, there will be exemptions for people on maternity leave, and with long-term disabilities and illnesses.

#### Accelerating Factors

AdviceUK is concerned about many of the accelerating factors set out in the consultation. It appears that the Government wishes to accelerate applications for high earners because it considers these individuals to be the most contributive to society. However, contribution should not be determined by income. Our members' advisers provide life-saving advice to almost 3 million people in Britain every year, yet they are not typically high earners. The Advice Workforce Development Fund Report, a survey of the London advice sector, found that the median salary for a Trainee Adviser/Caseworker was £24,570, for an Adviser/Caseworker was £32,000 and for an Advice Supervisor/Team Leader was £35,225.<sup>24</sup> The median salary for a Solicitor was £36,000 and for a Supervising Solicitor was £47,500.<sup>25</sup> Under the proposals, the average London adviser would not be considered valuable enough to have their settlement pathway accelerated. This points to the unfairness and illegitimacy of the values that underpin the Government's immigration policy

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<sup>23</sup> NAO, [An analysis of the asylum system](#), 10 December 2025.

<sup>24</sup> The London Legal Support Trust and the Advice Workforce, [Conditions and Benefits of the London Social Welfare Advice Sector](#), May 2025.

<sup>25</sup> Ibid.

framework. This is characterised well by RAMFEL: “the proposals create a two-tier settlement system that punishes people on lower incomes.”<sup>26</sup>

Furthermore, we are concerned about the proposal to accelerate applications based on volunteering. It risks forcing individuals to volunteer where they cannot do so and puts pressure on advice services to accept more volunteers when they may not have the capacity to do so. Our concern on this point is shared widely within the voluntary sector, as evidenced by the National Council for Voluntary Organisation (NCVO)’s submission to this consultation. The NCVO states that its members are worried about “safeguarding and exploitation. Vulnerable people may feel unable to refuse unsuitable placements and several organisations raised explicit concerns about risks of abuse and modern slavery from businesses posing as charitable causes.”<sup>27</sup>

### Decelerating Factors

We are concerned about the proposed decelerator on accessing public funds as it discriminates against individuals who need financial support from the state. For instance, those with caring responsibilities and the disabled. Indeed, we are already seeing the consequences of the proposals. RAMFEL have reported that one of their clients, a mother of three with an autistic daughter, cancelled her disability allowance over fear of the new settlement changes.<sup>28</sup> The client said “I’ve stopped the benefits, even though I need them because I’m so scared I will not be able to get my settlement. It feels so unfair that I accessed benefits because I’m on a low wage and now that is being used against me.”<sup>29</sup>

Additionally, we are concerned about the proposals on “illegal” arrival. There are many legitimate reasons why people arrive in the UK “illegally.” As the International Rescue Committee makes clear, it is often because they are fleeing dangerous situations and there are no safe and legal routes for them to access, either in their country of origin or in a transit country.<sup>30</sup> International law on this issue makes clear that there is no legal requirement for an individual to claim asylum in the first safe country they enter.<sup>31</sup> As the UK is a founding member of the 1951 Refugee Convention, which stipulates this, we urge the current Government to respect the rights of refugees to claim asylum in the UK. As the holocaust survivor, Elie Wiesel, first said in 1988, “no human being is illegal.”<sup>32</sup> It is critical that the UK Government considers this sentiment when designing the future of the immigration system.

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<sup>26</sup> AdviceUK member case study, available upon request.

<sup>27</sup> NCVO, [NCVO submission to the Fairer Pathway to Settlement Consultation](#), 5 February 2026.

<sup>28</sup> AdviceUK member case study, available upon request.

<sup>29</sup> Ibid.

<sup>30</sup> IRC, [7 reasons why people risk their lives to cross the Channel in small boats](#), November 24, 2022.

<sup>31</sup> UNHCR, [Convention and Protocol Relating to the Status of Refugees](#), 1951.

<sup>32</sup> Armando Aliu and Dorian Aliu, ‘[The EU’s Hospitality and Welcome Culture: Conceiving the “No Human Being Is Illegal” Principle in the EU Fundamental Freedoms and Migration Governance](#),’ *Human Rights Review*, March 21, 2022.

### 3. Contribution

Question 1: Do you think the following groups should be exempt from the requirement to have earned above £12,750 for at least 3 to 5 years?

AdviceUK response: Yes

While we reject the framework, if the proposals are to be taken forward, AdviceUK strongly supports the principle that those on maternity leave, with long-term illnesses, disabilities and those in certain occupations with different pay arrangements should be exempt from the minimum earnings threshold.

Question 2: Are there any other groups that you think should be exempt from the requirement to have earned above £12,750 for at least 3 to 5 years?

We reject any threshold for settlement that requires a minimum level of income. This ignores the geographical, political and socio-economical context that determines pay levels and why people are in-work or out of work.

If proposals are taken forward and there is to be a threshold, then exemptions should be comprehensive. Additional exemptions should apply to survivors of domestic abuse, exploitation and human trafficking, and individuals with caring responsibilities.

Question 4-5: High earnings

As we have set out above, this proposal risks excluding individuals who are contributing to society in work that does not usually pay at this level.

Question 6: Do you think those employed in a public service occupation (i.e. health and education occupations where going rates are based on national pay scales) should be eligible for a reduction in their qualifying period to settlement?

AdviceUK's response: Yes.

While we reject the whole framework set out in these proposals, if it is taken forward, then those working in public services with nationally set pay should be eligible for reductions. However, advice staff should also be eligible for reductions given their value to society.

Question 7: What do you think about the proposed penalties for applicants claiming public funds?

AdviceUK's response: The penalty goes too far / there should be no penalty.

Penalising access to public funds risks serious harm, including increased destitution and safeguarding failures.

Question 8: To what extent do you agree or disagree that once someone has been granted settlement in the UK they should be eligible to claim public funds (e.g. benefits and housing assistance)?

AdviceUK's response: Strongly agree.

Once settlement is granted, individuals should have full access to public funds.

Questions 9–13: Volunteering and community contribution

See above.

#### **4. Residence**

Question 1: Which of the following penalties do you think should be applied to each of the following applicants?

Answer: There should be no penalty for these applicants.

See our answer above.

#### **5. Eligibility and Equalities**

Question 1: Where the standard qualifying period is proposed to increase from 5 to 10 years, which option do you think should apply to each of the following visa holder groups?

AdviceUK response: Reduction (of 5 or 7 years from the standard qualifying period of 10 years)

While we reject increasing the qualifying period, if proposals are taken forward, AdviceUK supports providing exemptions for the specific groups set out in the consultation.

Question 2: To what extent do you agree or disagree that dependants of migrants who hold Global Talent or Innovator Founder visa status should retain their current 5-year path to settlement?

AdviceUK's response: Strongly agree

If proposals are taken forward, dependants should retain a 5-year route.

Question 3: To what extent do you agree or disagree that there should not be transitional arrangements for those already on a pathway to settlement?

AdviceUK's response: Strongly disagree

We strongly disagree with the removal of transitional arrangements. Transitional protections are essential to fairness and legal certainty.

Questions 4–8: Vulnerable groups and dependants

As set out above, AdviceUK strongly supports retaining current protections for victims of domestic abuse, bereaved partners, children and young people who grew up in the UK, adults with long-term care needs, and members of HM Armed Forces and their families.

Question 9: To what extent do you agree or disagree that resettled refugees should have a 10-year route to settlement?

AdviceUK response: Strongly disagree

We strongly disagree with a 10-year route for resettled refugees and caution against requiring children to earn settlement independently. This is discriminatory and goes against the principles that we believe should underpin the immigration system.

## Questions 10–12: Barriers to meeting requirements

AdviceUK members identify significant barriers, including lack of documentation, financial hardship, language barriers, health needs and limited access to regulated advice. Children will be particularly affected by prolonged insecurity and family stress.

### **6. Impact on Organisations**

#### Questions 1–6: Organisational impact

AdviceUK anticipates a severely negative impact across workforce retention, planning and administrative burden. The proposals are likely to increase demand, complexity and risk at a time when advice services are already operating beyond capacity. For instance, our Advice Works 2025 report found that the average advice service lost three staff or volunteers, needs three more advisers to meet demand and struggled to fit at least one vacancy in the previous year.<sup>33</sup>

It is important to note that many advice services that provide support to immigrants, refugees and asylum seekers are themselves staffed by migrants, refugees and asylum seekers. Indeed, a member in the East of England told us that the proposals will make it harder for the 28% of their staff that have refugee status to remain in work which will result in a “capacity impact [that] will be detrimental.”<sup>34</sup> They also warn that the proposals will make their staff with refugee status poorer as some of them will have to choose between benefits and settlement. They told us that one of their employees works part time to care for their young children and currently receives universal credit.<sup>35</sup> This employee is facing a decision between continuing to claim this benefit and making ends meet and securing their settlement.<sup>36</sup> Without additional resources, the earned settlement framework risks destabilising the advice sector and undermining access to justice by making it harder for people to live and work in the UK.

### **7. Conclusion**

AdviceUK believes that the proposed earned settlement framework, as currently designed, risks undermining the objectives it claims to advance. The framework’s design is not “fair,” as the name of this consultation suggests. By extending routes to settlement, embedding punitive conditionality, and privileging income over social contribution, the proposals are likely to increase insecurity, discourage integration and entrench inequality. For the people our members support, this would mean longer periods of uncertainty, heightened risk of destitution, and reduced willingness to engage with public services and support systems. For advice services, it would mean increased demand, greater complexity, and intensified pressure on a workforce that is already overstretched and experiencing high levels of burnout.

AdviceUK therefore rejects these reforms. Any future settlement framework must be grounded in fairness and must recognise the full range of contributions migrants make to UK society, including through low-paid but essential work, caring roles and community support. If any reforms are to be taken forward, they must include robust exemptions for vulnerable groups, meaningful transitional

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<sup>33</sup> AdviceUK, [Advice Works](#), 2025.

<sup>34</sup> AdviceUK member case study, available upon request.

<sup>35</sup> Ibid.

<sup>36</sup> Ibid.

arrangements for those already on pathways to settlement and a commitment to resourcing the advice sector to support increases in demand.

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