

Submission from the Immigration Law Practitioners' Association on the Statement of Changes in Immigration Rules (HC 1691) and one linked instrument

1. The [Immigration Law Practitioners' Association \(ILPA\)](#) is a charity and professional association founded in 1984, now representing over 4,000 individuals and organisations across the UK, practising in all aspects of immigration, asylum, and nationality law. ILPA exists to promote and improve advice and representation in immigration, asylum and nationality law and to act as an information and knowledge resource for members of the immigration law profession. Our vision is to create a fair and effective immigration system that respects human rights and the rule of law.
2. We request that the Secondary Legislation Scrutiny Committee draw the [Statement of Changes to the Immigration Rules: HC 1691](#), published on 5 March 2026, to the special attention of the House on the following bases:
 - i) that the Statement of Changes is of political or legal significance, or raises issues of public policy likely to be of interest to the House;
 - ii) that it may imperfectly achieve its policy objectives;
 - iii) that the explanatory material laid in support provides insufficient information to gain a clear understanding about the instrument's policy objective and intended implementation; and
 - iv) that there appear to be shortcomings in the consultation process.
3. At the outset, we would note that there has been no formal consultation on any of the changes in this Statement, as the Government claims, 'this would be disproportionate given the nature of the changes' ([Explanatory Memorandum](#), §7.1). We disagree that such consultation would have been 'disproportionate' given the gravity of many of these changes. Moreover, we record our concern and regret that the Simplification of the Rules Review Committee is inoperative. The Home Office is no longer using this vital mechanism to assist with reviewing Rule changes and ensuring their accuracy. For example, there was a typographical error contained in the Statement of Changes at APP SW4 in the new SW 14.3B(d), as the reference in that sub-paragraph to SW 14.2(a) should be a reference to SW 14.2A (the latter of which relates to salary deductions). Avoidable errors such as this could be caught at an early stage, through drawing on the specialist expertise of the Review Committee's members. We have noted an increasing number of such errors in recent Statements.
4. While the Statement of Changes contains a number of policy changes and amendments to the Immigration Rules, our evidence focuses on the below seven changes.

Change 1: From 5 March 2026 at 15:00 GMT, nationals of Nicaragua and St Lucia are subject to a visit visa requirement and are barred from making Electronic Travel Authorisation (ETA) applications.

5. The Home Office justifies this first change on the basis that (i) in the last four years 609 Nicaraguans and 360 St Lucians have claimed asylum, and (ii) St Lucia grants Citizenship by Investment ([Explanatory Memorandum](#), §§5.22-5.24). Given these small numbers over the past four years, the Government's concern that abiding by the 21-day convention would trigger 'an unpredictable and unmanageable strain upon the UK's migration and borders system' appears to be unfounded ([Explanatory Memorandum](#), §11.2). There is insufficient explanatory material laid to support that conclusion. The breach of the convention continues the trend we have seen in prior Statements of Changes, of eroding essential parliamentary scrutiny.

Change 2: From 26 March 2026, a "visa brake" will be imposed, prohibiting entry clearance applications for Students who are nationals of Afghanistan, Cameroon, Myanmar and Sudan and Skilled Workers who are nationals of Afghanistan.

6. The decision to prohibit entry clearance applications for Students who are nationals of Afghanistan, Cameroon, Myanmar, and Sudan and Skilled Workers who are nationals of Afghanistan, irrespective of their personal circumstances, undermines the UK's international obligations under the 1951 Refugee Convention ('the 1951 Convention'). This change is both politically and legally important.
7. First, while the Government seeks to prioritise ineffective deterrence measures over fairness and access to protection, this restriction will remove one of the few lawful routes through which individuals from Afghanistan, Sudan, Myanmar, and Cameroon may reach the UK, despite satisfying all eligibility requirements, such as complex "points-based" sponsorship, qualifications, and any financial requirements. By closing a safe route, for people who are found by the Home Office to be genuine students or genuine skilled workers (who have proven their intention to contribute to the UK), and who may *also* be genuine refugees, it will push people into dangerous journeys and may result in increased loss of life in the channel, increased irregular arrivals, without any great reduction in the cost of asylum support. The Impact Assessment does not address that possibility. It is unclear how greater loss of life or smuggling/trafficking activity will restore public confidence.
8. Second, the 1951 Refugee Convention recognises¹ that individuals may seek protection even after having been abroad for some time, such as if their personal circumstances or the situation in their home country change significantly. Many people here lawfully have previously made such asylum applications 'sur place', and have successfully been recognised as refugees. Therefore, the Government's decision to restrict existing lawful visa routes because individuals on those routes *may* later claim asylum is contrary to the purpose and spirit of the Convention. This approach portrays asylum

¹ Convention Relating to the Status of Refugees, Article 31(1).

claims made after lawful entry as a form of abuse or misuse of the immigration system, notwithstanding the long-recognised principle of *sur place* protection and despite individuals meeting all of the requirements of the routes on which they come. At no point have they acted unlawfully; on the contrary, at every point they have acted lawfully and within their rights.

9. Additionally, this ban or “brake” is difficult to rationalise, as holding a study or work visa does not provide any advantage when seeking protection status. Individuals are still required to establish a ‘well-founded fear of persecution’ when making an asylum claim, and each case is assessed on its merits, a principle which has historically underpinned immigration control.
10. Further, the [Explanatory Memorandum](#) at §5.4, suggests that a purpose of the “visa brake” is to understand the underlying issues and trends associated with these behaviours, what further nuanced interventions could be put in place in the longer term to address them, and strengthen the public confidence which would be undermined if ‘purpose-bound visa-routes (like Study) are, *or are perceived to be*, used as a route to claim asylum’. However, a blanket ban on certain visa applications from specific nationalities prior to those trends being clearly identified and a causal link being evidenced, is a disproportionate policy choice. It is concerning that this change is intended to tackle perceptions, before the Home Office even understands the underlying issues and trends. This is likely to result in it imperfectly achieving its policy aims.
11. The [Explanatory Memorandum](#) at §5.1, indicates that nationals of these four countries ‘present some of the highest proportions of asylum claims to visas issued’. However, it is unclear how many nationals of these countries entered as students/skilled workers and subsequently went on to claim asylum. If the assumption is made based on immigration data from the number of students/skilled workers who entered the UK from a specific nationality, and the number of asylum claims made by nationals of that same country in the same period, this is unlikely to be sufficient, as these are two different datasets (i.e. an increase in asylum claims from nationals of Myanmar may be due to irregular or other entry unrelated to student visas). For example, the asylum summary tables for the year ending December 2025 show that the number of Afghan nationals claiming asylum in the latest year is down by 20% compared to 2024.² The data on grants of student visas suggests that 15 Afghan nationals were granted entry clearance for a Bachelor’s degree in Q4 of 2024, and 24 were granted in Q3 of 2025.³ The same data shows that the asylum claims made by Ukrainians

² Home Office, ‘Immigration system statistics data tables’, Asylum, Asylum summary tables, year ending December 2025 (26 February 2026), table Asy_01b <<https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables#asylum>> accessed 13 March 2026.

³ Home Office, ‘Immigration system statistics data tables’, Sponsored study visas by course level’ (26 February 2026), table Asy_01b <<https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables>> accessed 13 March 2026.

have increased by 63% compared to 2024, while the number of entry clearance grants for a Bachelor's degree increased from 9 applicants in Q4 of 2024 to 149 in Q3 of 2025. According to these statistics, Ukraine presents one of the highest proportion of asylum claims to visas issued. Therefore, it is not clear from the Explanatory Memorandum, or other explanatory information, whether the immigration data was considered holistically. It is also unclear whether a less restrictive alternative to a complete ban was considered.

12. While the Rule changes contain a brake of indeterminate length, the [Impact Assessment](#) states at §9 that the brake will be for 18 months. It is unclear why the length is not stated on the face of the Immigration Rules.
13. Moreover, the visa brake is 'estimated to reduce the number of asylum claims from migrants arriving in the UK on visas by 1,400; of which, 1,300 from Study visas and 90 from Skilled Worker visas' ([Impact Assessment](#), p 6). The short-term first order effects are estimated to be between -£127.5 million and -£36.5 million net present social value. While the Impact Assessment urges these to be read against the potential longer term benefits, including the second order effects and behavioural changes (such as fewer asylum claims, or less sponsorship of students/workers likely to seek asylum), it states these benefits are 'unquantifiable'. Therefore, (equally) plausibly it may be a cost to society, a cost in and to human lives, and fail to result in the behavioural changes pursued.

Change 3: From 26 March 2026, permission to stay for adults and families recognised as refugees or granted humanitarian protection will be reduced from five years to 30 months, requiring extensions to be made 'within the last 28 days of the applicant's permission to stay'.

14. This change will affect adults and accompanied asylum-seeking children ('AASC') who have made an initial or fresh asylum claim on or after 2 March 2026. It will not impact unaccompanied asylum-seeking children ('UASC'), for whom a new retrospective pathway is still in development.
15. In this instance, while the Home Secretary made an oral statement three days before the Rule change was laid, the change which comes into effect on 26 March 2026 is retrospectively backdated to 2 March 2026, undermining the intended purpose of the 21-day. It also will affect individuals who may have arranged an appointment to claim asylum prior to 2 March 2026, but whose appointment to register their asylum claim took place on or after that date due to backlogs within the Home Office. We would urge the Committee to pay close regard to this retrospective turn in rule-making, which undermines legal certainty, and the rule of law.
16. The key aim of this change is to 'change perceptions of what the refugee offer is in the UK', by providing 'entitlements for refugees that are entirely in accordance with our international obligations but do not exceed them', and aiding the integration of refugees 'by encouraging them to work and

contribute to the UK' if they wish to settle ([Explanatory Memorandum](#), §§5.6-5.7).

17. It is very difficult to gain an understanding of the exact implementation as the protection work and study route, referenced in the policy statement [Restoring Order and Control](#) (November 2025), is not introduced by this set of changes. Therefore, it is unclear how many people will be left to linger for 20 years on the new core protection route, and how many will be eligible to switch to the fee-paid protection work and study route. However, in relation to the third aim, we would note that keeping refugees in protracted limbo for 20 years, with precarious status that may be lost every few years, will result in their segregation rather than integration into our communities and society. In relation to the second aim, we would note that a 20-year route to settlement is out of step with a good faith interpretation of Article 34 of the Refugee Convention, which requires the UK to as far as possible facilitate the assimilation and naturalisation of refugees and expedite naturalisation proceedings.
18. More generally, this is a legally and politically important change. We are deeply concerned by the wider policy, towards which this is a first step. Refugees making an asylum claim on or after 2 March 2026 will need to make a minimum of nine applications before they can settle on the core protection route. Not only does this proposal ignore the protracted reasons underlying the displacement of many refugees, it will place a huge and costly burden on the Home Office, the proposed new appeal/adjudicator body, practitioners, and legal aid funds. If in each application, country and personal circumstances must be rigorously scrutinised to determine if a refugee still requires protection, for extension and settlement applications, as well as any appeals of a decision to remove status, refugees will need legal advice from at least a Level 2 IAA regulated advisor, if not a solicitor, barrister, or other qualified person. At the end of last year, there was an unprecedented backlog of more than 80,000 appeals ([Tribunal Statistics Quarterly](#), March 2026), and more than 64,000 people awaiting an initial asylum decision ([Migration Statistics](#), February 2026). There are already grave shortages in the capacity of specialist practitioners to assist with current claims and appeals, let alone the four-fold increase in applications under the new scheme which require a claim to be made in the last 28 days of the person's permission to stay. The combined impact is likely to be that refugees who are unable to find the legal representation they need failing to apply in time and falling subject to hostile environment measures.

Change 4: From 26 March 2026, the Secretary of State will have discretion to disclose that an individual has made an asylum claim, if there is a public interest in doing so.

19. We note it is concerning that the new public interest test is *only* set out in the [Explanatory Memorandum](#) (§5.18), not the Immigration Rules. It requires all of the following conditions to be met:

- a. *a person has either been charged with a particularly serious crime or we have been advised that the person has been charged and the case is so high profile as to meet this threshold criteria, or that the person has been charged and there are significant cumulative offences sufficient to meet this threshold criteria; and*
 - b. *sufficient information upon which to complete a considered decision is available; and*
 - c. *disclosure is in accordance with data protection obligations; and*
 - d. *the risk of disclosure to actors of persecution is considered; and*
 - e. *there are no exceptional reasons not to disclose; and*
 - f. *the minimum necessary data is disclosed.*
- 20. The stated aim of this change is for the Home Office 'to support greater transparency in high-profile and sensitive cases... involving alleged serious criminality will likely lead to criticism of obstruction, erosion of public trust, and the spread of misinformation; ultimately increasing community tensions' ([Explanatory Memorandum](#), §5.16).
- 21. This change is both legally and politically important, as the risk and impact assessment should include the risk of reprisals to other people seeking asylum, including those housed and processed in hotels and centres, which become a lightning rod for anti-migrant violence, to racialised, minorities, and migrantised persons, and to those who represent and support all such persons. Moreover, the test should be clearly stated in law and subject to scrutiny, rather than relegated to memoranda. Without such a risk assessment, disclosure may increase community tensions, thus imperfectly achieving policy objectives.
- 22. Further, the [Explanatory Memorandum](#) at §5.14 notes that there is 'intense media and public interest in migrants who have been arrested, charged or convicted of serious criminal offences. Disclosure of immigration status has been increasingly requested by media'. It is unclear whether the concept of public interest is being used in its legal sense, or whether it is in fact being conflated with the interest of members of the public or media in particular cases. While the Explanatory Memorandum refers to certain criteria (§5.18), it is not clear how these safeguards will be interpreted in practice. We would recommend a more appropriate balancing exercise, of all relevant risks and factors.

Change 5: From 26 March 2026, the right to work will be altered for people seeking asylum, whose applications are pending and have been for at least one year.

- 23. Currently, this cohort is restricted to employment in jobs on the Immigration Salary List, including in lower-skilled but shortage roles such as Fishing and agriculture occupations and trades, Care and Senior Care workers, Nursing assistants, Pharmaceutical technicians, Animal care services, Construction, Carpenters, Roofers, Bricklayers, Stonemasons, Boat and ship builders, and Welding trades. The new restriction will be to degree-

level roles listed in Appendix Skilled Occupations, which may not be in shortage. The aim is said to be to ease 'governmental support demands' ([Explanatory Memorandum](#), §5.30).

24. This is a legal and politically important change, which fails to recognise and denies people seeking asylum the opportunity to make important contributions in our economy and to society, to be financially independent, while at the same time painting such persons as being overly dependent on state support and failing to integrate.

Change 6: From 26 March 2026, the requirements for children with a settled or British parent/relative in the UK applying for settlement under Part 8 of the Rules will be changed.

25. We are concerned that the new rules will only apply: (i) to close relatives; (ii) where one parent is settled and the other has no limited leave and is not being granted such leave; (iii) where there are serious and compelling reasons to grant the applicant settlement (rather than where such reasons make the child's exclusion undesirable). While presented as 'clarifying' the long-standing Home Office policy and bringing alignment, it is a substantive change, following the Home Secretary losing a case in the Court of Appeal.⁴ Furthermore, it is out of step with Appendix Children to the Rules, which permits a child – who has one settled parent and one parent with limited leave – to settle so long as there are serious and compelling reasons to grant the applicant settlement.⁵
26. We are concerned that insufficient explanatory material has been laid together with the statement to understand the objective and implementation of this legally important change. Furthermore, if the intention is harmony across the Rules, we are concerned that these changes will imperfectly achieve their policy objective.

Change 7: From 8 April 2026, a safe return review will be undertaken during consideration of settlement protection applications

27. The safe return review will take place unless the Secretary of State directs otherwise, to determine whether there have been any changes in country conditions or an individual's personal circumstances which could lead to their grant of refugee status or humanitarian protection being revoked or not renewed ([Explanatory Memorandum](#), §§5.72-5.73). While the Explanatory Memorandum notes this as a 'clarifactory change' (§5.74), in reality, its codification in the Immigration Rules will likely require individuals

⁴ *R (Kone) v Secretary of State for the Home Department* [2025] EWCA Civ 1653, §41.

⁵ Immigration Rules, Appendix Children, CHI 4.3(b).

to prepare and submit more evidence, in a climate where the specialist refugee law sector is under severe strain.

28. It is important to recall that the reasons people flee persecution are complex and multi-faceted. Often, they cannot be solely attributed to fear of persecution from a regime, and a regime change will not resolve their real risk of serious harm. Even if there has been a regime change, it will still be necessary to consider whether an individual's human rights will be violated by removing them, including if their home country is in a humanitarian crisis resulting from internal displacement and destruction of homes and critical infrastructure, or if the regime change is insignificant or only temporary, rather than of a permanent or long-lasting character. For example, in December 2024, the UN Refugee Agency [stated](#): *'UNHCR does not consider that the requirements for cessation of refugee status for beneficiaries of protection originating from Syria have been met. The changed circumstances in Syria, that being the fall of the Assad regime and the formation of a provisional government, cannot currently be considered so fundamental and durable in nature, such that the situation which justified that granting of refugee status has ceased to exist'*.
29. For all of the aforementioned reasons, we respectfully request that the Secondary Legislation Scrutiny Committee draw this Statement of Changes to the special attention of the House.

Berivan Gunes and Zoe Bantleman

Immigration Law Practitioners' Association

13 March 2026

Submission from the Refugee Council on the Statement of Changes in Immigration Rules (HC 1691) and one linked instrument

1. The Refugee Council supports refugees and people seeking asylum in the UK. This includes people who apply for protection through the asylum system and those who have arrived on safe and legal routes. A key focus of our work is working with refugees to support their integration, including through focused employment support so that they can successfully contribute to their communities.

2. We request that the Secondary Legislation Scrutiny Committee draw the Statement of Changes in the Immigration Rules, HC 1691, to the special attention of the House for the following reasons:
 - (i) The statement of changes is of political or legal significance, or raises issues of public policy likely to be of interest to the House;
 - (ii) That the explanatory material laid in support provides insufficient information to gain a clear understanding about the instrument's policy objective and intended implementation; and
 - (iii) That it may imperfectly achieve its policy objectives.
3. We are particularly concerned by the following elements of the Statement of Changes:
 - (i) The halving of the length of leave granted to refugees recognised through the asylum system from 5 years to 2.5 years, effective for any application made on or after 2 March 2026.
 - (ii) The "visa brake" applied to students from Afghanistan, Cameroon, Myanmar and Sudan.
 - (iii) The failure to "unpause" rules for refugee family reunion.

Change to length of leave for refugees

4. The statement of changes reduces the length of leave given to an adult or a child in a family recognised as a refugee by the UK Government from 5 years to 30 months. While this provision comes into force on 26 March 2026, it applies retrospectively to anyone who made an asylum application or who submitted further submissions to an asylum claim on or after 2 March 2026. This is a politically and legally important change, as announced by the Home Secretary in her written ministerial statement of 2 March.⁶ The Home Secretary, in that statement, described the change as a "reset in Britain's asylum offer."
5. Based on our experience of supporting refugees, the Refugee Council believes that making a refugee's future in the UK more precarious will negatively impact integration outcomes and can lead to an increased exploitation of this group. The lack of stability can have a negative impact on a refugee's mental and physical health, making it harder for them to secure and hold on to employment or engage positively with training opportunities. There is also a risk that employers will be less likely to invest in refugees if there is a lack of certainty around the refugee's future in the UK. Indeed, we have observed reluctance from some employers even with five years of refugee or humanitarian protection leave.
6. The statement of changes sets out that those granted leave for 30 months under the changes will be able to apply for further permission to stay

⁶ <https://questions-statements.parliament.uk/written-statements/detail/2026-03-02/hcws1373>

within the last 28 days of that leave. However, the statement of changes does not provide any information on what that application process will consist of. Currently, there is also no specific settlement route for refugees who applied for asylum after 2 March 2026. This is a result of the change being, as described in the explanatory memorandum to the changes, “the start of introducing a new regime” that aims “to integrate those who are here by encouraging them to work and contribute to the UK.”

7. The “new regime” centres on the introduction of what the government refer to as “Core Protection”. As set out in the Restoring Order and Control policy statement⁷, the intention is that refugees recognised through the UK’s asylum system will be granted 30 months leave, with their need for international protection reviewed at the end of that time. If they are still found to be in need of protection, their leave will be renewed for a further 30 months. This will repeat until the refugee either is found to no longer be in need of protection, they leave the UK, they move onto another visa route, or they qualify for settlement. Under the proposals, those on core protection will not qualify for settlement for 20 years, a quadrupling of the current five years for recognised refugees.
8. As part of these changes, it is also proposed that a new, in-country work and study protection route will be created. Refugees will be able to apply to switch from core protection onto that route. The work and study route will, it is proposed, offer access to family reunion and won’t be subject to the protection reviews.⁸
9. This creates a much more complex process for refugees in the years after they are granted refugee status. Currently, a refugee is granted five years leave, after which they can apply for settlement. The settlement process includes a review of whether it would be safe for the refugee to return to their home country. Under the proposals, a refugee could have to undergo seven applications to have their leave extended before applying for settlement. Whereas under the current system the Home Office would usually make one further decision on a refugee’s status in the UK after they are initially granted protection, under the changes that could be eight.
10. This will inevitably lead to a higher workload for the Home Office. The Home Office have not produced any impact assessments for the changes. However, Dan Hobbs, Director General at the Home Office, told the House of Lords Justice and Home Affairs Committee during an oral evidence session on 10 March that the department was not expecting to have to increase headcount to operationalise the changes.⁹ Nevertheless, the

⁷ <https://www.gov.uk/government/publications/asylum-and-returns-policy-statement/restoring-order-and-control-a-statement-on-the-governments-asylum-and-returns-policy>

⁸ See <https://questions-statements.parliament.uk/written-questions/detail/2026-03-04/118142>

⁹ Q163 House of Lords, Justice and Home Affairs Committee, oral evidence, 10 March 2026
<https://committees.parliament.uk/oralevidence/17300/html/>

Refugee Council's analysis estimates that, from the first reviews in 2028, the Home Office may need to carry out as many as 1.1m reviews over the next decade. This is based on levels of grants of refugee status over the last two years. It is hard to understand how the reforms can be implemented without extra resource for the Home Office.

11. No impact assessments have been published alongside the statement of changes covering the reduction in leave for refugees. The explanatory memorandum explains that "an Economic Note is not required for this Rules change because there is no immediate economic impact at this stage." It adds that "an Economic Note will be produced at the stage when the wider Core Protection reforms are designed and delivered to take into account the impact of these changes." This highlights the piecemeal approach that the Home Office is taking to the introduction of these changes. There is currently limited information available about how the Core Protection system will function, including the requirements refugees will need to meet to move onto the work and study protection route. Yet the change made in the statement of changes is considerable, making a significant change to the rights of refugees. The Home Office have not provided a timeline for when they expect the further elements of the Core Protection system to be introduced. The lack of further information about the reforms, including any assessment of their impact, is a significant barrier to the scrutiny of the changes.
12. It also creates a high degree of uncertainty for any refugee granted status having applied for asylum after 2 March 2026. They will have no certainty regarding their future. Given current rates of Home Office asylum decision making, the first refugees to receive the shorter period of leave are likely to get an asylum decision within the next three to six months. There has been no commitment made by the Home Office that the work and study route will be available by that point. Far from encouraging integration, this lack of certainty will, in the view of the Refugee Council, only add additional barriers.
13. The Home Office should explain why the change to the length of leave has been introduced at this point, rather than alongside the full Core Protection model. That would also have allowed the Home Office to fully set out the impact of their proposals, including any extra resources required to operationalise the change.
14. The Home Office has also not provided any evidence for why the change will improve integration outcomes for refugees. The Refugee Council's research has highlighted the existing barriers to integration that refugees currently face. Our report, *New Roots; New Futures*,¹⁰ published in June 2025, found that refugees face significant barriers to securing

¹⁰ <https://www.refugeecouncil.org.uk/stay-informed/statistics-and-research/new-roots-new-futures-the-need-for-a-national-refugee-integration-strategy/>

employment, accessing education and training (including English language classes), finding secure accommodation and building social connections.

15. Many refugees arrive in the UK with valuable skills and experience but struggle to secure jobs that match their expertise. There can be multiple challenges, from understanding the recruitment process to the recognition of qualifications. This is shown by the data on refugee employment outcomes, published as part of the Home Office's Refugee Integration Outcomes cohort study.¹¹ One in four refugees of working age are able to secure employment within a year of being granted status, increasing to nearly half within two years. That level then stays consistent up to eight years after being granted status.
16. The research does not show that refugees lack an incentive to integrate. It is not clear how the Core Protection model will remove the existing barriers to integration – indeed it would seem to create new barriers by making refugees feel less safe and secure, and reducing incentives for employers to invest in refugees.
17. Particular attention should be given to the impact of any changes on children, particularly given the Home Office's legal duties under section 55 of the Borders, Citizenship and Immigration Act 2009. While the reduction in length of leave will not immediately impact unaccompanied children, it is expected that they will be part of the Core Protection system and face longer waits for settlement. The reduction does apply to children who are part of family groups.
18. The Refugee Council believes this undermines children's well-established need for stability as they recover and rebuild their lives, as outlined in the UN Convention on the Rights of the Child. Repeated immigration status reviews and uncertainty around long-term residence drive avoidable school and college moves, as families are forced to relocate at short notice or lose housing. Each move disrupts attendance, pastoral support and special educational needs planning, setting back attainment and social integration at precisely the stage when continuity is most protective for children and young people. Temporary leave cycles and renewal windows risk colliding with GCSEs, Highers, A-levels and vocational assessments. Anxiety about imminent status decisions undermines revision and exam performance; in the worst cases, young people miss sittings due to reporting requirements, or application appointments, with limited options to re-sit in the same academic year.
19. Unstable status also makes it harder for young people to secure "home" fee status and student finance. Short grants of leave can push refugees into the "overseas" fee category or leave them ineligible for maintenance

¹¹ See <https://www.gov.uk/government/publications/refugee-integration-outcomes-rfo-employment-from-2015-to-2023>

support, closing off university progression or forcing course deferrals that stall integration and earnings potential. Employers, training providers and regulators often require evidence of stable right to work/study for the duration of a programme. Short, renewable leave discourages offers for multi-year apprenticeships and delays access to regulated careers (e.g., health, teaching, social care), wasting prior learning and constricting local labour supply. Despite these concerns, no children's impact assessment has been published.

The Visa Break

20. The Statement of Changes pauses the granting of study visas for nationals of Afghanistan, Cameroon, Myanmar and Sudan. The pause also covers skilled worker visas for Afghan nationals. The pause will be in place for an initial 18 months. The rationale for the "visa break" is that a high proportion of people arriving from those countries on visas go on to apply for asylum in the UK. As the explanatory memorandum states, it is being introduced "to protect UK border security from these unsustainable levels of visa-linked asylum claims."
21. The impact assessment¹² sets out that the "unsustainable levels of visa-linked asylum claims" from those four countries amounted to 1,210 claims in the year to September 2025. Home Office data shows that during that time a total of 89,509 claims were made.¹³ The 1,210 claims therefore represent 1.35% of all claims made during that time.
22. The impact assessment does not mention that many of those people who have applied for asylum having on arrived on a visa will be granted refugee status. The grant rate at initial decision in 2025 for Sudanese nationals was 93%, for Myanmar nationals it was 84%, for nationals of Cameroon it was 51% and for Afghans it was 36%.¹⁴ A significant number of those refused will be granted following an appeal, and that is increasingly the case in regard to Afghan claims. An individual can be both a student and a refugee. The impact assessment does not make any assessment of the danger that a refugee may face if they are unable to access a safe route to the UK. Media reports have highlighted the personal circumstances of some of those impacted by the break.¹⁵ Given the impact on individuals compared to the expected reduction in asylum applications, it is not clear that break is a proportional policy response.

¹²

https://assets.publishing.service.gov.uk/media/69a9a3301f59a04b996e77f3/HO1030_Visa_Brake_Impact_Assessment.pdf

¹³ Home Office Immigration statistics year ending December 2025, Asylum - Claims and Initial decisions, table Asy_D01

¹⁴ Home Office Immigration statistics year ending December 2025, Asylum - Claims and Initial decisions, table Asy_D02

¹⁵ See, for example, Sudanese students say UK visa ban has dashed hopes of studying at top universities <https://www.theguardian.com/education/2026/mar/10/sudanese-scientists-shock-home-office-ends-visas-for-sudan-students>

23. The impact assessment says that monitoring of the change “will include tracking the number of asylum claims submitted by migrants who arrived on Work, Study, or Visit visas – as well as those that enter into the UK without a visa – to assess any behavioural effects on applicants and sponsors during the visa brake period.” It is not made clear why there would be any behavioural changes by anyone not directly impacted by the break. Nationals of other countries will know they aren’t impacted. The impact assessment does not say that the monitoring will include the impact on those who would previously have had a safe route to travel to the UK but may now be at risk.

Refugee family reunion

24. The provisions in the immigration rules that allowed refugees to be reunited with their closest family members were paused in September 2025 through the statement of changes published on 4 September (HC1298). That statement of changes was drawn to the special attention of the House by the committee.¹⁶ The pause was supposed to be until Spring 2026. However, the statement of changes contains no provisions relating to refugee family reunion, whether that would be to reinstate the previous position or introduce a new system.

25. At the time of the pause, the Home Office said that refugees could either apply to bring their partner/spouse and/or dependent children via other family visa routes, or that refugees may choose to wait to apply after the pause had finished. In the report on the statement of changes, the committee said:

“We expect the Home Office to publish regular impact data throughout the suspension period, covering, for example, the effects on housing, irregular arrivals, processing capacity and the numbers and results of applications for family reunion from refugees through non-[refugee family reunion] routes.”

No such data has been published and it is not possible to ascertain from the published family visa data how many sponsors had refugee status.

26. Neither the explanatory memorandum to the statement of changes published on 5 March or the accompanying written statement explain when refugee family reunion will be unpaused, set out the impact of the pause to date, or provide further information about future processes. It would, therefore, be welcome if the Committee was able to follow-up on its previous scrutiny.

¹⁶ <https://publications.parliament.uk/pa/ld5901/ldselect/ldsecleg/185/18503.htm>

27. For the reasons set out above, we respectfully request that the statement of changes be drawn to the special attention of the House.

Refugee Council

12 March 2026

Submission from the Work Rights Centre on the Statement of Changes in Immigration Rules (HC 1691) and one linked instrument

We wanted to bring your attention to an issue with the Statement of Changes laid on 5 March 2026. We hope your review is ongoing and wanted to raise a particular issue: the change to English language requirements.

The Statement of Changes increases the English language requirement to B2 for several immigration routes. The change is said to be deferred until March 2027 so that affected individuals are provided with an opportunity to meet the new skill level. In reality, the government should not be tabling these changes until there has been proper consultation and scrutiny – especially given their stated promises to publish impact assessments prior to implementation.

Specifically:

- These changes are part of the Earned Settlement model. This model was subject to a public consultation which received over 200,000 responses. The model is said to still be under consideration.
- Within the 'Earned Settlement' consultation paper, published alongside the consultation period, the Government stated that impact assessments would be 'published in due course' along with a paper summarizing the consultation responses.
- In February 2026, Minister Mike Tapp answered a written question on the implementation of the English Language requirements - to which he acknowledged the ongoing consultation and that the model would be subject to not only its results, but also economic and equality impact assessments "which we have committed to publish in due course."
- These impact assessments have still not yet been published.

This incident falls into a larger pattern of failing to publish impact assessments, where a previous oversight in July 2025 was identified and addressed by this Committee.

We must stress the impact of these changes:

- Our estimate is that no fewer than 945k and 963k people would be affected.
- Without proper economic and equality impact assessments, there is no clear information about the effect of these changes, including potentially disproportionately affecting vulnerable groups.
- As well, the impact upon labour markets including the so-called 'low skilled' workers who would struggle to meet these requirements and thus leave the country increasing sectoral vacancies.
- We are happy to submit a further and more detailed summary of this issue if it would assist the Committee.

We are drawing this Committee's attention to this oversight, and request that it use its scrutiny powers to seek the Government produce these impact assessments or that Parliamentarians be alerted to the fact that the Government is attempting to implement its model without honouring its commitment.

9 March 2026

Submission from Mr. Daniel Rogers on the Statement of Changes in Immigration Rules (HC 1691) and one linked instrument

I am writing as a British teacher currently working at a British international school in Thailand operated by a UK-headquartered education group. I am writing to share a perspective that may be relevant to the Committee's scrutiny of any proposed measures relating to restrictions on student visas from Afghanistan, Cameroon, Myanmar and Sudan.

In my role, I teach a number of students from Myanmar, and they are among the strongest students I have encountered in my career. In fact, our current Head Student is from Myanmar. These students are taught entirely in English by British-trained teachers, follow British curricula, and complete British qualifications.

Several of these students already hold offers from highly respected UK universities, including the University of Edinburgh and the University of Manchester, where they intend to study STEM disciplines, economics and history. They are not seeking to come to the UK to exploit asylum loopholes. Rather, they are seeking a world-class education and intend to contribute positively to the UK during their studies and beyond.

The UK's higher education sector is one of the country's most successful global exports. Students from international schools such as ours — British-owned, staffed by British teachers, and delivering British qualifications — represent exactly the kind of internationally mobile, academically prepared students the UK should wish to attract. They bring talent, ambition and significant economic benefit.

I fully appreciate the government's objective of addressing irregular migration and the potential misuse of the asylum system. However, the students I teach are not responsible for those systemic challenges. A broad restriction risks unintentionally penalising capable and diligent young people who have invested years preparing specifically for British university study.

For that reason, I would respectfully encourage the Committee, in its scrutiny of any relevant secondary legislation or policy measures, to consider whether amendments or exemptions might be appropriate. One possible approach would be to allow students educated in accredited British international schools — taught in English by British-trained teachers and studying British qualifications — to retain the ability to apply for UK student visas. Such an approach could help preserve the integrity of the immigration system while ensuring that talented and well-prepared students are not inadvertently excluded.

The young people I teach would be a credit to the UK. They are exceptionally talented, kind and hard-working. It would be a loss — economically, academically and morally — if they were prevented from pursuing the education they have worked so hard to access.

Thank you for taking the time to consider this perspective from a teacher working directly with these students.

Yours faithfully,

Mr. Daniel Rogers

Teacher of Business & Economics

Regents International School Bangkok

4 March 2026

Joint Submission from Freedom from Torture and the Helen Bamber Foundation on the Statement of Changes in Immigration Rules (HC 1691) and one linked instrument

On 5th March 2026, the Home Secretary laid Statement of Changes to the Immigration Rules HC1691 which, amongst other things, reduces the length of permission to stay given to recognised refugees and those with humanitarian protection in the UK from 5 years to just 30 months.

Freedom from Torture and the Helen Bamber Foundation are extremely concerned by the reduction in duration of permission to stay for people who have sought asylum in the UK because it creates constant uncertainty and forces refugees to live in limbo which will have profoundly harmful effects on their mental health, financial stability, and social integration.

The arguments we outline below are based on academic research and our experience of providing lifesaving therapeutic treatment, as well as legal and welfare support, to some of the most vulnerable people in the asylum system including survivors of torture, trafficking and other extreme human cruelty. We would like to draw the Committee's attention to:

- The lack of consideration of the extensive evidence of the harmful impact of short grants of leave on refugees' mental health and on integration.
- The lack of consultation, Equality Impact Assessment and consideration of the impact of these changes on those with protected characteristics.
- The conflict between the changes and the UK's obligations under international law.
- The lack of analysis of the Home Office's ability to deal with the administration of these changes.

What are the changes that are being introduced?

Since 2005, refugees and those with humanitarian protection have received a five-year grant of permission to stay (also known as 'leave to remain'),¹⁷ with an 'active review' to determine continuing need for protection at the point at which they apply for indefinite leave to remain (settlement).¹⁸

Under this Statement of Changes, the length of leave which is given to recognised refugees and those with humanitarian protection (adults and accompanied children) is being reduced to two and a half years (30 months). If they wish to remain in the UK, they will be required to reapply for leave in the 28 days before their current leave expires.

When they reapply, they will be subject to a 'safe return review' during which their situation will be assessed to decide whether protection is still needed, and refugee status/humanitarian protection could be revoked if their home country is judged to be "safe". These changes will apply to people who claim asylum or make further submissions¹⁹ from 2nd March 2026.

These changes will not be applied to unaccompanied children seeking asylum at present because the Home Office is still considering the pathway for that group. People who succeed with an asylum claim, or further submissions, lodged before 2 March 2026 will still be able to apply for settlement after their grant of five years leave to remain.

This shift to temporary status is part of a wider package of reforms that will introduce a new 'core protection' system for people with a recognised need for protection. The Government intends to bring in further reforms to settlement rules which will mean that recognised refugees and those with humanitarian protection may have to wait up to 20 years – renewing this 'core protection' status up to eight times - before they can apply for indefinite leave to remain (also known as 'permanent settlement'). If they switch to a proposed 'Protection Work and Study' route (if they secure a job or begin to study at a certain level and pay a fee) they can 'earn' settlement more quickly and will not be subject to the safe return review.²⁰

The Helen Bamber Foundation and Freedom from Torture's key concerns regarding the duration of permission to stay provided to people with a recognised need for protection are:

¹⁷ Home Office. [Integration Matters: A National Strategy for Refugee Integration](#), 2005

¹⁸ Free Movement, [Safe return reviews and Home Office policy on settlement for refugees](#), 2017; [Settlement protection](#)

¹⁹ Further submissions are a mechanism for individuals to present new evidence for asylum or human rights protection after an initial claim has been refused and appeal rights are exhausted

²⁰ This links to wider immigration proposals under which people will have to demonstrate some form of "contribution" to society before being eligible for ILR. [Restoring control over the immigration system: white paper - GOV.UK](#) and [A Fairer Pathway to Settlement: A statement and accompanying consultation on earned settlement](#)

1) It will have a profoundly harmful impact on the mental health, rehabilitation and recovery of survivors of torture, trauma and exploitation

Refugees have often fled serious trauma and a sense of stability is crucial for their subsequent recovery. It is estimated that one in three asylum-seekers and refugees living in countries like the UK are survivors of torture.^{21,22} When individuals experience immigration insecurity and are repeatedly required to prove their need for protection, they are kept in a constant state of anxiety about their future, which can exacerbate symptoms of PTSD, depression, and chronic stress.⁶ Instead of being able to focus on rebuilding their lives, their attention is continually pulled back to the fear of losing their right to stay.

In Australia, research²³ found that despite similar levels of pre-migration trauma, refugees with temporary visas scored significantly higher on psychiatric symptom measures (PTSD, anxiety, depression) compared to those with permanent protection, even after controlling for other established risk factors.

There is also extensive published evidence of the harmful impact of temporary status in the context of survivors of trafficking who receive no leave to remain (or very short periods of leave) via the National Referral Mechanism.²⁴

"Trauma therapy cannot work when someone is living in fear of their immigration status." HBF client

This insecurity also disrupts key aspects of daily life that support wellbeing, such as stable housing, employment, and long-term relationships. Employers and landlords may be reluctant to offer opportunities to people whose legal status appears temporary, making it harder for refugees to achieve financial security or plan for the future. Without the ability to settle or invest emotionally in their communities, refugees can experience isolation and hopelessness. These stressors compound over time, particularly when the pathway to permanent settlement stretches so far ahead that it feels unattainable.

Members of HBF's lived-experience advocacy group, the Ambassadors For Change,²⁵ consistently describe temporary status as leaving them *"not secure and anxious,"* with one Ambassador saying, *"It makes my day-to-day life very*

²¹ Redress, July 2022, Whose Justice: Reflections From UK-Based Survivors of Torture. [online] [accessed 16/10/25]. Available at: https://redress.org/wp-content/uploads/2022/07/REDRESS_PoJ-Report_WEB.pdf

²² % of FFT's active clients that had completed a PCL-5 (a tool that assesses the presence and severity of PTSD symptoms) had PTSD as at the end of 2024.

²³ Momartin, S., Steel, Z., Coello, M., Aroche, J., Silove, D. M., & Brooks, R. (2006). [A comparison of the mental health of refugees with temporary versus permanent protection visas](#). *Medical Journal of Australia*, 185(7), 357-361. And Nickerson, A., Byrow, Y., O'Donnell, M., Bryant, R. A., Mau, V., McMahon, T., Hoffman, J., Mastrogiovanni, N., Specker, P., & Liddell, B. J. (2023). *The mental health effects of changing from insecure to secure visas for refugees*. *Australian & New Zealand Journal of Psychiatry*, 57(11), 1486-1495. <https://doi.org/10.1177/00048674231177950>

²⁴ Helen Bamber Foundation, ATLEU and ECPAT UK, [Road to Nowhere: The impact of insecure immigration status of survivors of trafficking](#), July 2025

²⁵ The Ambassadors for Change is a group of survivors of torture and trafficking with experience of the UK asylum system. See Helen Bamber Foundation, [Survivor Engagement and Activism](#)

uncertain... I struggle to make long-term plans because I don't know if I will be allowed to stay." Others explained that they "can't plan the future at all".

2) Deterrence is a failed strategy that creates chronic instability and prevents refugee integration

The Government's stated objective in introducing this policy change is 'to change perceptions of what the refugee offer is in the UK'²⁶ and 'encourage those wishing to build a life in the UK to do so via legal routes and reduce the pull factors driving illegal migration'.²⁷ This deterrent approach to asylum reform has repeatedly proven itself to be a flawed strategy both in the UK and abroad, by failing to demonstrate any clear impact on the decision making of those moving across borders to seek safety. Meanwhile, it has profoundly undermined government objectives on refugee integration and social cohesion.

Temporary protection visas (TPVs) were first introduced in Australia in 1999 and were abolished in 2008 due to significant community pressure regarding their harmful impact. Mental health experts found that refugees on TPVs experienced increased anxiety, depression and post-traumatic stress disorder in comparison to permanent protection visa holders.²⁸ The Australian Human Rights Commission reported that temporary protection creates uncertainty for children, which worsens their mental health and hinders their participation in education opportunities.²⁹ The immense suffering caused by temporary protection was further heightened by restrictions preventing family reunion, which tore families apart. Despite this, TPVs were re-introduced in 2014 before the Albanese government finally recognized the failure of that system in 2023 and provided pathways to permanent protection.

The Nationality and Borders Act 2022 first introduced a 'two-tier' system, whereby refugees deemed to have entered 'illegally' were only granted two and a half years leave to remain,¹⁴ and were only eligible for settlement under the 10-year-long residency route. This two-tier system was introduced despite widespread criticism, including by UNHCR who expressed concern about the discriminatory nature of the policy.³⁰ The policy was then 'paused' in July 2023 and superseded by the provisions in the Illegal Migration Act 2023.³¹ Ultimately,

²⁶ [Explanatory Memorandum to The Statement of Changes in Immigration Rules](#)

²⁷ [Written statements - Written questions, answers and statements - UK Parliament](#)

²⁸ Killedar, A & Harris, P, [Australia's refugee policies and their health impact: a review of the evidence and recommendations for the Australian](#)

[Government](#), *Australian and New Zealand Journal of Public Health*, Volume 41, Issue 4, 2017; Momartin S, Steel Z, Coello M, Aroche J, Silove DM, Brooks R. [A comparison of the mental health of refugees with temporary versus permanent protection visas](#), *The Medical Journal of Australia*, 2006, 185(7), .

²⁹ Human Rights and Equal Opportunity Commission, [A last resort? National Inquiry into Children in Immigration Detention](#), 2004, ¹⁴ Home Office, [Nationality and Borders Act 2022](#)

³⁰ [UNHCR deeply concerned at discriminatory two-tier UK asylum plans, urges rethink | UNHCR UK](#)

³¹ Robert Jenrick, [Illegal Migration Update](#), 2023

the reform had failed in its purpose to create a deterrent and merely generated more work for the Home Office.

The Home Secretary has expressed her desire for the UK to be 'in line' with broader trends in Western Europe and has taken Denmark's restrictive approach to refugee settlement as an example to follow. Yet, Denmark's "paradigm shift" has been shown to have caused 'legal and human uncertainty' for refugees,³² and a context of chronic instability, extended limbo and 'hyper-precarity'. Research has found that refugees in Denmark with temporary permits felt unable to build a future, with insecurity affecting every aspect of their lives. The need to continually renew temporary permits, without a meaningful sense of progress toward permanent protection and with looming fear of removal from the country, keeps refugees in a chronic cycle of uncertainty and hypervigilance and undermines any sense of safety or protection.³³

Further evidence from Denmark shows that temporary refugee protection, and the constant threat of status review, prevents refugees from building long-term futures and significantly undermines their ability to pursue education or invest in meaningful careers.³⁴ Rather than incentivising integration, tightening settlement rules in Denmark has in fact reduced refugees' employment levels, as overly strict and unattainable requirements discourage those already struggling.³⁵

"It's deeply dehumanising it. It treats people as objects that can be [moved] from one place to another without any acknowledgement of roots, of emotional labour, of living in in a place... to just leave people in limbo, it's also dehumanising." Member of Survivors Speak OUT

3) It is not compliant with international law

This reduction in the duration of permission to stay is presented as a solution to the enduring challenge of 'illegal migration' more generally, and specifically the use of 'dangerous journeys' by those seeking asylum. This is not a legitimate reason to reduce the length of leave provided to refugees.

While the 1951 Refugee Convention recognises that refugee status is by its nature temporary, it allows refugee status to end only when there has been a 'fundamental and durable' change in the country of origin such that the risk genuinely ceases to exist. Meanwhile, Article 34 of the Convention requires

³² Vedsted-Hansen, J. [Refugees as future returnees? Anatomy of the 'paradigm shift towards temporary protection in Denmark](#). CMI Report, 2022.

³³ Kusk, M. L. [I Can't Create a Future with a Temporary Permit](#). *Nordic Journal of Migration Research*, 13(4), 1-19, 2023; Shapiro, D., & Jørgensen, R. E. [Are we going to stay refugees?](#). *Nordic Journal of Migration Research*, 11(2), 172-187, 2021.

³⁴ *ibid*

³⁵ Arendt, J. N., Dustmann, C., & Ku, H. [Permanent Residency and Refugee Immigrants' Skill Investment | IZA - Institute of Labor Economics](#). *Journal of Labor Economics*, 43(2), 293-318, 2025.

States to “as far as possible facilitate the assimilation and naturalization of refugees” and “in particular make every effort to expedite naturalization proceedings...”.³⁶ Naturalisation is the end-point of the scheme of the Convention, which allocates rights according to the refugee’s level of attachment to the host state (rising from subjection to the jurisdiction to physical presence, lawful presence and lawful stay). It outlines rights to gainful employment, welfare, housing, education and social security – all of which are harder to achieve with shorter periods of leave. As highlighted by the UNHCR in its response to the UK’s recent asylum policy announcements,³⁷ these changes seriously risk undermining refugee integration outcomes.

Under the UN Convention Against Torture (UNCAT)²³ survivors have an internationally recognised right to rehabilitation, which aims to restore their physical, mental, social, and vocational abilities for their full inclusion and participation in society. As a signatory to the Convention, the Government must provide the means for as full rehabilitation as possible. Policies such as this – that can severely undermine recovery – put the Government at risk of breaching its obligations under UNCAT.

4) It will result in further administrative chaos and delay in the asylum system

Every day, our clients are negatively affected by problems in Home Office decision making, including long delays, poor quality and ineffective communication. As of December 2025, there were 48,723 cases (relating to 64,426 people) awaiting an initial decision on their asylum claim. Over a third of cases have been waiting for an initial decision for over a year. In an effort to reduce the backlog of initial decision making, the Home Office has increased productivity but at the expense of quality. The poor standard of decision making is already putting immense strain on the appeal system with over 80,000

asylum appeals now waiting to be heard by the First Tier Tribunal.³⁸ Only 52% of protection decisions met the Home Office’s quality standards in 2023/2024³⁹ – the lowest on record – and 36% of protection refusals that were decided by the First-tier Tribunal were overturned in the last quarter of 2025. In addition, 42% of protection refusals disposed of by the FTT were withdrawn – presumably in the most part by the Home Office and in recognition of the unsustainability of the decision.⁴⁰ Until the causes of the quality issues are resolved, further pressure on the decision-making system is only likely to exacerbate this problem.

³⁶ UN General Assembly, [1951 Convention Relating to the Status of Refugees](#), United Nations, Treaty Series, vol. 189, p. 137, 28 July 1951

³⁷ UNHCR, [UNHCR Observations on Restoring Order and Control: A Statement on the UK Government's Asylum and Returns Policy](#). 2025 ²³ [Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment](#) | OHCHR

³⁸ [Tribunal Statistics Quarterly: October to December 2025 - GOV.UK](#)

³⁹ [Migration transparency data - GOV.UK](#)

⁴⁰ [Tribunal Statistics Quarterly: October to December 2025 - GOV.UK](#)

UNHCR has rightly identified that the government's plan to review refugee status every 30 months is 'likely to impose overwhelming and unnecessary financial and administrative burden on the Home Office'.⁴¹ If the Government proceeds with plans to introduce a 20 year path to settlement for people with 'core protection' status then the individual will have their status reassessed eight times before they can be eligible for settlement. Analysis shows that the Home Office would be required to conduct between 1.66 million and 1.9 million reviews of refugee status over the first decade. This would result in a total cost of between £1.1 billion and £1.27 billion, depending on how many people lose their protection at review. These large numbers are minimum estimates, because it does not take account of the thousands of refugees who win their cases at appeal, so the true cost and number of repeat reviews is likely to be much higher.⁴²

Already, people applying to renew their limited leave to remain experience many problems due to administrative errors, including entitlement to benefits being wrongly refused or terminated; employment being wrongly terminated or refused, and other issues relating to housing and higher education. Significant delays by the Home Office in making decisions compound the frequency and severity of these issues. Subjecting tens of thousands more refugees to more frequent reviews, delays and decisions, with the worsening delays in decision-making which will likely occur, will exacerbate the issues of marginalisation and poverty already experienced by refugees and others seeking safety in the UK. More and more people will lose or be refused employment (despite the putative aim of these reforms being to move more people into work) and lose or be refused the public funds they depend on to be able to feed their family.

5) Lack of consultation or impact assessment

When launching the Civil Society Covenant in July 2025, the Prime Minister committed to work differently with civil society on issues like migration, by "bringing people together to fix the problem".²⁹ We are, therefore, surprised by the lack of consultation ahead of laying this Statement of Changes.

Both HBF and FfT participate in the Home Office Asylum Strategic Engagement Group, which is one of the ways in which the Department engages with the refugee sector as a stakeholder community. Over many years, this group has provided a mechanism for consultation with expert organisations on policy developments and operational changes concerning the asylum system. In failing to take advantage of this mechanism, or indeed any other means of consultation, ahead of laying the Statement, the Government has missed an opportunity to identify unintended consequences and harmful impact that this

⁴¹ UNHCR, [UNHCR Observations on Restoring Order and Control: A Statement on the UK Government's Asylum and Returns Policy](#). 2025

⁴² 'Unworkable' asylum reforms will force up to 1.9m refugee reviews and cost taxpayer more than £1.27bn - Refugee Council ²⁹ [PM speech at the Civil Society Summit: 17 July 2025 - GOV.UK](#)

policy change will impose on some of the most vulnerable people in our communities.

We are also concerned that there appears to have been no consideration of the impact of these changes on those with protected characteristics and note that the Government has not yet published an Equality Impact Assessment.

Conclusion

Stability and security should not be a reward or a privilege, but prerequisites for refugees to rebuild their lives. These building blocks enable refugees to heal from profound harm, to work, study, form relationships, contribute to their communities, and plan for the future without fear of return to torture and persecution. The requirement to reapply to retain protection status every two and half years will leave refugees in a state of ongoing, prolonged uncertainty, harming their integration and mental health. Making security and settlement temporary prolongs insecurity and harms mental health, undermines integration, and delays recovery from trauma.

From our direct experience with people fleeing torture, trafficking and serious trauma, we do not see that the proposed changes will act as any form of deterrent. These changes do not remove the desperate need experienced by people who are at risk of persecution, violence and abuse, and for whom there is no available safe route to enter the UK in order to seek safety here. Such journeys are exceptionally dangerous, and yet people take that risk because to not do so, and to remain in their current circumstances, is even more dangerous.

When asked what they wished policymakers understood, one Ambassador for Change said:

"I wish policymakers could walk in my shoes and truly understand how difficult life is with insecure immigration status. It is very different from making decisions from a place of safety, and these policies often make already vulnerable people's lives feel unbearable."

12 March 2026

Statement of Changes in Immigration Rules (HC 1691): Further information from the Home Office

Reducing the duration of refugee and humanitarian protection and permission to stay

Q: If I understand correctly, the changes in this section come into force on 26 March, but apply to claims and submissions from 2 March, making the changes retrospective.

- a) Is that a reasonable interpretation?**
- b) Does the enabling legislation allow retrospective application in this way?**
- c) The effect of this arrangement is that the changes breach the 21-day rule in spirit, if not in letter. How is this justified?**

A: (a) These changes are not retrospective as they do not change the terms of grants of leave made prior to 26 March 2026. The standard position in respect of Rules introduced by virtue of s3(2) of the Immigration Act 1971 is that the Rules that apply to an application are those in force at the date of decision and the SSHD is not required to include transitional provisions for applications submitted prior to the entry into force of the new rules.

In this instance, the SSHD did decide to introduce transitional provisions for applications submitted before 2 March 2026 on which date the Home Secretary laid a WMS announcing this change, and an article was also published on gov.uk.

(b) The Statement of Changes is laid pursuant to the SSHD's powers at section 3(2) Immigration Act 1971. As above, the new provisions do not have retrospective effect as they do not change existing grants of leave.

(c) The changes take effect 21 days after they were laid and, as above, the SSHD laid a WMS on 2 March and an article was published on GOV.UK on the same date. This approach took account of the risks that notice of the change could create, notably the real risk of individuals undertaking dangerous journeys to try and reach the UK before the deadline. Whilst all small boats crossings are inherently dangerous, they are particularly perilous in unfavourable weather conditions, creating a foreseeable risk to life. By announcing that changes will apply to all future claims, the motivation to seek to make such a journey within a confined number of days is limited.

Q: In respect of unaccompanied children, if I understand correctly, the "new model and pathway" for this cohort is still to be developed but, once finalised, it will apply to claims and submissions from 2 March 2026. This appears to introduce an even greater element of retrospectivity, as (i) the length of the retrospective period will presumably be significantly longer, and (ii) at least with the changes described in the previous point the structure of the regime being applied retrospectively is known to those who might consider applying.

- a) How can it be justified to introduce a unknown regime retrospectively in this way?**

- b) How can potential applicants make a decision on whether to claim, without knowing what system will be in place?**
- c) What is the expected timescale for finalising the “new model and pathway”?**

A: (a) These changes are not retrospective as they do not change the terms of grants of leave made before the changes take effect (please see responses to question 1). If, after claiming asylum or making further submissions on or after 2 March 2026, an unaccompanied child is granted protection status, they will receive 5 years’ permission to stay, as per the new Immigration Rules. This includes unaccompanied children who will have since turned age 18 by the time they are granted protection status.

For as long as an individual would be at risk of serious harm if they were to return to their home country, they will not be expected to return there, in compliance with our international obligations. That position is unchanged regardless of the date of the claim.

(b) If an individual considers that it would be unsafe for them to return to their home country, they should apply for asylum at the earliest opportunity.

As noted previously, for as long as an individual would be at risk of serious harm if they were to return to their home country, they will not be expected to return there. That position is unchanged regardless of the date of claim.

(c) Work is underway to develop the model and pathway for unaccompanied asylum-seeking children who represent a small but important group in the asylum system. As looked-after children and later as care leavers, we must consider their specific needs and potential vulnerabilities as part of policy development, and this includes engaging with key stakeholders with expertise in this area.

There is no set timescale for when this work will be finalised, however further details will be set out in due course.

Q: Further to the ‘retrospectivity’ point raised earlier:

- **Is it correct that someone who arranged an appointment to claim asylum before 2 March, but whose appointment took place after that date due to Home Office backlogs, would be covered by the new system? If so, how is that justified?**
- **ILPA argues that the changes will exacerbate the current shortage of legal practitioners by leading to more claims and appeals, leading to refugees failing to final legal representation. How do you assess this risk?**

A: For individuals who sought to register an asylum claim before 2 March 2026, but were provided with an appointment to register their claim on or after 2 March 2026, the Home Office will consider them as if they ‘made an asylum claim’ before 2 March 2026, but only if they attend their scheduled appointment (or, in the event that it is cancelled or rescheduled due to reasons attributable to the Home Office), the rescheduled appointment. The application date remains that of the day they attend and a valid application for asylum is registered. This

is not specifically required by the rules but is an exercise of a discretion for the small cohort to whom it applies.

However, if the individual does not attend their appointment, but later wishes to register a claim for asylum on or after 2 March 2026, they will not be considered to have 'made an asylum claim' before 2 March 2026 unless:

- there were circumstances beyond their control that made it impossible for them to attend the appointment scheduled for them; and
- they contacted the Home Office as soon as reasonably practicable to explain their circumstances, provided relevant evidence and request a new appointment.

Where an individual who is considered to have 'made an asylum claim' before 2 March 2026 under these transitional arrangements is granted refugee status or humanitarian protection, the individual will be granted 5 years permission to stay on a protection route.

Claimants are encouraged to seek legal advice where it is required and may be eligible for Legal Aid. This is overseen by the Ministry of Justice.

Q: Much of the commentary on this provision has been around possible negative implications for the ability of refugees to integrate into communities and find stable housing/employment. These are the very aims of the policy, as described in para 5.7.

a) How will reducing the length of stay contribute to improving integration and the ability of refugees to contribute to the UK?

A: Reducing the length of leave granted to refugees is the first step towards introducing the future protection model, as outlined in the Restoring Order and Control statement published in November 2025. At the end of the 30 month period, refugees will be able to renew their leave and will have two routes available. Those who are contributing to the UK through work or study will be able to switch into a new Protection Work & Study route. Those with an ongoing protection need will be able to switch into Core Protection. This will provide a clear pathway for refugees who integrate and contribute to renew their stay on that basis

Q: The EM and press release on these changes stress the significance of the move and it effectively comes into force immediately.

a) How, therefore, can there be "no immediate economic impact at this stage" and thus no economic or impact assessment?

b) What is the expected additional processing cost to review claims every 30 months?

c) Will additional resource be provided?

d) If not, what effect will the change have on the asylum processing backlog?

e) Approximately what percentage of renewal applications are expected to be refused over time?

A: (a) Any impact will only begin to occur 30 months after the first grant is issued. An economic impact assessment of the future protection model will be provided at the time that it is introduced.

(b) An economic impact assessment of the future protection model will be provided at the time that it is introduced.

(c) We are committed to ensuring our policies are sustainable and do not place unnecessary burdens on the taxpayer, and this policy is no different. In terms of resources and processing, only those who do remain on Core Protection will have their protection needs regularly reviewed. Reviews will be targeted based on objective country information, and any other new information that comes to light, allowing us to make the most efficient use of resources. We will continue to monitor staffing levels and will deploy our workforce flexibly subject to business needs as we have done in the past.

(d) We will encourage refugees to switch out of the Core Protection route wherever possible into a new, bespoke work and study route.

Where a person switches into the protection work and study route, they will not be subject to a review of their protection status, provided that they continue in employment or education and successfully renew their leave on that basis.

The Home Office continues to invest in a programme of transformation and business improvement initiatives to speed up decision making and reduce the time people spend in the asylum system and decrease the number of people who are awaiting an interview or decision. This will enable us to maximise our capacity and progress cases in a more efficient and cost-effective way.

(e) All cases will be assessed on their individual merits, and it is not possible to provide an estimate at this time.

Q: What is the expected timetable for the “wider Core Protection reforms” to be designed and implemented?

A: The new Core Protection and Protection Work and Study routes will be introduced prior to the expiry of any 30 month grant of leave issued after 26 March. More details on dates and the routes will be set out in due course.

Q: The Refugee Council estimates that the change in rules could lead to an additional 1.1 million reviews over a decade, while it also reports the Home Office as stating that it was not expecting to have to increase headcount.

- **Is that a reasonable estimate of the number of additional reviews?**
- **Is it the case that no additional headcount will be provided?**
- **Noting your previous response that the Home Office will “deploy our workforce flexibly”, do you expect to reduce staffing in other areas?**

A: We do not recognise this figure as it assumes that we will re-casework every person granted protection every 30 months. We do not want people to remain on Core Protection for the long term, and only those who do remain on Core Protection will have their protection needs regularly reviewed. Reviews will be targeted based on objective country information, and any other new information that comes to light, allowing us to make the most efficient use of resources. We

will continue to monitor staffing levels and will deploy our workforce flexibly subject to business needs as we have done in the past, subject to demand across the system.

The approach to reviewing status will be efficient and targeted; we will reassess where country conditions or personal circumstances have changed significantly.

To do this we will build on the efficiencies that have already seen record levels of initial decisions being made, including use of AI, such as our policy search tool or case summarisation which are already assisting asylum decision makers.

Q: Why has the change to the length of leave been introduced prior to the full Core Protection/Work and Study routes, which prevents Parliament from being able to scrutinise the changes in the round?

A: In November 2025 the Government published a new Asylum Policy Statement setting out significant reforms to the UK's asylum and illegal migration system. This was accompanied by a speech in Parliament where MPs were provided the opportunity to ask questions about these proposals.

The Statement outlines the current challenges, the Government's objectives, and a comprehensive package of measures to restore order, control, fairness and public confidence in the system.

The public rightly expects swift action to improve the system. This Government has already started to deliver these changes. Further details are set out in the Home Secretary's written statement of 2 March 2026. This is available at: [Written statements - Written questions, answers and statements - UK Parliament](#).

Further detail about other reforms will be provided in due course.

Q: Your previous answers argued that the changes will improve refugee integration because of the introduction of the Work and Study route (I assume your final sentence "This will provide a clear pathway for refugees who integrate and contribute to renew their stay on that basis" refers to the Work and Study route – please clarify if not). However, the argument is potentially somewhat circular – refugees will only be able to get onto that route if they have a job in the first place, which, the Refugee Council argues, will be made more difficult by the reforms.

- **Please comment on this view.**
- **Please also comment on the view that the reduction in stability will discourage access to apprenticeships and regulated careers, as well as to stable housing.**

A: Those who are granted protection status and the associated permission to stay will receive 30 months permission to stay, for as long as their protection needs are ongoing and will continue to receive unrestricted access to the employment market and recourse to public funds.

Those who switch into the Protection, Work and Study route will be able to unlock further entitlements, such as earn down their settlement period, and

sponsor family reunion applications. This route will be based on continued contributions to the UK through work and study, and safe, return reviews will not be undertaken.

Q: The Helen Bamber Foundation and Freedom from Torture (HBF/FfT) argue, citing international evidence, that the changes will have a “profoundly harmful impact on the mental health, rehabilitation and recovery of survivors of torture, trauma and exploitation”. Please provide your view on this point.

- **Please also provide a view on whether the changes are consistent with the right to as full rehabilitation as possible under the UN Convention Against Torture.**

A: We make no apology for our aims to undermine the organised criminal gang model, deter illegal journeys, and ultimately save lives by demonstrating to both smugglers and migrants that the small boats route to the UK is not a viable option for migrants to remain here.

For those who are most in need of protection, our message continues to be, that people should seek sanctuary in the first safe country they reach and avoid being exploited by ruthless criminal gangs.

The UK has a proud history of providing protection to those in need. It is important that safe and legal routes are sustainable, well managed and in line with the UK’s capacity to welcome, accommodate and integrate refugees. We are developing new safe and legal routes to offer sanctuary to those genuinely fleeing war and persecution from around the world, in line with the capacity of UK communities to support new refugees.

Those that do come to the UK and successfully claim asylum, will continue to receive permission to stay, right to work, recourse to public funds and healthcare in line with our international obligations.

We consider that these new reforms meet our international obligations. Those recognised as refugees and beneficiaries of humanitarian protection status will continue to receive the same entitlements to healthcare, access to public funds, including housing and social support. As such, it is considered that victims of torture and other vulnerable individuals will continue to be eligible to access support in the UK.

No one will be returned to a country where they will face a risk of serious harm.

Q: Please comment on the view that UK and international experience of temporary or shorter-term leave to remain is that it has failed in creating a deterrent.

A: There are a number of reasons why asylum intake may fluctuate in countries across the globe, and no one policy can achieve every objective and aim. Although we do note the policy responses in other countries.

As set out in the Restoring Order and Control statement: “As we have held rigidly to the old model, other countries have tightened theirs. This has been

most notable in Denmark, though not exclusively so. There, a radical transformation of the asylum system has taken place. Refugee status has become temporary, and not permanent. Refuge lasts only as long as a safe harbour is genuinely required. And the state has taken a far more concerted effort to remove those who are failed asylum seekers. Last year, asylum claims in Denmark fell to a 40-year low”.

Q: Is it the case that tighter settlement rules in Denmark have led to reduced refugee employment levels?

A: We are keen to learn from the experience of other countries in Europe and wider, such as Denmark, to see how they have overcome challenges in their asylum system.

We will continue to develop our own policies with the aim to deter irregular arrivals, offer sanctuary to those in need, and encourage those recognised as refugees to integrate and contribute to UK society through employment and study.

Q: Please comment on HBF/FFT’s argument that the speeding up of initial decision making has been accompanied by a fall in quality, with a high number of refusals overturned or withdrawn and a low number of decisions meeting quality standards.

A: We are committed to getting decisions right the first time.

Decision-makers are fully aware of the importance of making the right decision on the evidence available and the consequences of refusing those who need protection. That is why we carefully consider every case on its individual merits.

The Home Office publishes data on asylum decision quality. This shows the volume of decisions being sampled and how they have been scored. The published data shows that 94% of decisions are considered ‘correct’ against the agreed quality marking criteria. Asylum decision quality has been maintained in line with the previous year, while the volume of decisions checked has more than doubled.

Most quality assurance checks are completed before a decision is implemented. This means that any errors identified during the sampling process are likely to have been corrected before the decision is served.

We have a robust quality assurance strategy in place to ensure that asylum decision makers meet the standard expected of them, and to ensure compliance with the published policy.

We aim to identify trends and issues impacting quality assurance and customer service, thereby reducing costs, safeguarding our business and asylum claimants, and ensuring we get decisions right the first time. Through rigorous caseworker recruitment, deployed targeted coaching, and introduced quality review stages, we are reducing unnecessary appeals and withdrawals.

Q: Why was there no consultation with the Asylum Strategic Engagement Group ahead of these changes?

A: Given the pace of change it is not always possible to consult ahead of all policy reform and updates. We continue to inform stakeholders of changes to asylum policy and always appreciate feedback when sought, and through the various forums. When it is appropriate to do so, and when time allows, we do look to engage with the Asylum Strategic Engagement Group where possible.

Occupations in which asylum seekers can work

The increase in the skilled worker threshold from RQF 3 to RQF 6 in HC 997 was said to be in response to the “growth in visa numbers, and concerns about exploitation of overseas recruits”. This EM states that the change in relation to asylum seekers is to align the restrictions with skilled workers and to “help individuals who are able to work find higher-skilled jobs, easing governmental support demands and ensuring that assistance goes to those most in need”.

However, the situation of skilled workers and asylum seekers is very different; the former may be considering coming to (or staying in) the UK based on what jobs they will be able to apply for, and therefore an increase in the threshold could be a direct disincentive. But asylum seekers are already in the country, and (largely) reliant on government support if they do not find employment.

- a) For clarity - is it correct that the change means that asylum seekers with skills below RQF 6 will not be able to find a job, meaning that they will not be able to provide for themselves, rather than relying on the taxpayer?**
- b) If so, why is that an appropriate change to make?**
- c) What proportion of asylum seekers are likely to have qualifications equivalent to at least RQF 6?**
- d) In what sense does increasing the threshold actually help individuals to find higher-skilled jobs, as stated?**
- e) How many people does the Government expect to (i) find a higher skilled job than they would have previously; and (ii) not be able to find any employment, where previously they would have had a lower skilled job?**

A: (a) Those who claim asylum in the UK are not normally allowed to work whilst their claim is considered. They are instead provided with accommodation and support to meet their essential living needs if they would otherwise be destitute.

Under the changes taking effect from 26 March 2026, asylum seekers who apply for permission to work may only seek employment in roles defined on the Skilled Worker occupation list at RQF level 6 and above if their claim has been outstanding for 12 months or more. This replaces the previous policy position whereby employment for those who successfully applied for permission to work was limited to occupations set out in the Immigration Salary List.

We cannot speculate whether employers will recruit asylum seekers in these occupations. That is between the asylum seeker and the employer.

Individuals who had extant leave when they claimed asylum will be allowed to continue to work under the restrictions of their previous visa (provided their leave has not been curtailed) which is not restricted to RQF 6 and above. Based on the most recent published statistics, that is at least 26% of asylum applications made in the year ending December 2025.

(b) The move to RQF 6 and above aims to ensure that where PTW is granted, it seeks to support self-sufficiency by enabling access to higher skilled roles that reduce the burden on public funds, therefore limiting asylum support for those who genuinely require it. Higher skilled roles are a deliberate safeguard and ensure that PTW aligns with wider economic routes and immigration reforms.

The use of this list creates a consistent approach to the occupation list the Government uses for asylum seekers when compared to the varied mixture of roles previously provided for on the Immigration Salary List.

Individuals who are not in work are still eligible to take on volunteering opportunities. Volunteering for a charity or public sector organisation provides a valuable contribution to their local community and this will assist with their integration if they ultimately qualify for protection.

(c) The Home Office does not publish data on the number of asylum seekers who are granted permission to work or the proportion thereof who may have the ability to work in roles at RQF Level 6 or above.

The PTW1 application form includes fields on occupation, qualifications and English language ability, these additions are intended to support future policy development and reporting.

(d) It aligns asylum seekers, where eligible, with the same labour market opportunities as Skilled Worker migrants, expanding the available occupation list from 25 roles to 121 roles.

Additionally, the Explanatory Memorandum says the "change aims to help individuals who are able to work find higher-skilled jobs" not as framed by the question. For example, since the introduction of the Immigration Salary List in March 2024 (HC590), the Home Office received requests from asylum seekers to work in roles that were higher skilled but prohibited by virtue of paragraph 360 at the time. This change rectifies that.

Higher skilled jobs could provide a sustainable income for individuals which may reduce dependency on asylum support.

Study or volunteering is available to asylum seekers prior to the period of eligibility for permission to work, which may assist individuals to develop the skills required for some higher skilled occupations.

In any event, we have also seen a significant increase in asylum decisions being concluded within 12 months. This means that decisions are being made faster

and those granted asylum will have full access to the labour market. This will make the utilisation of this policy less essential to genuine asylum seekers.

(e) The Home Office does not publish data on asylum seeker permission to work.

More widely, there is published information on how many initial asylum claims are awaiting a decision for 12 months or more.

This highlighted that at the end of December 2025, there were a total of 15,182 cases who may be eligible to apply for permission to work. This has been falling consistently for the last 18 months and a 12.7% decrease from the previous quarter.

Visa brake for Afghanistan, Cameroon, Myanmar and Sudan

Q: What is the Home Office's assessment of whether the changes will lead to increased irregular arrivals, with no great overall reduction in asylum support costs?

A: The potential for displacement to irregular routes was considered as part of policy development. Whilst there may be some displacement, we assess that the policy will result in a reduction in asylum support costs. It is estimated that the visa brake will lead to 1,300 fewer asylum claims from migrants arriving on Student visas and 90 fewer asylum claims from those arriving on Skilled Worker visas. This situation will be kept under active review.

There are also currently no Visa Application Centres (VACs) open in Afghanistan and Sudan. This means that any nationals of these countries who were applying to travel to the UK prior to the visa brake were already doing so not in Afghanistan or Sudan but in a safe country in which there was a VAC.

More widely, the Home Secretary in her recent Restoring Order and Control statement, announced that we will be opening new safe and legal routes, and will make sponsorship the primary means by which we resettle refugees. An immigration policy which sought to operate purpose-bound visa routes, like study, with the intention of reducing irregular arrivals, would look very different to the one we currently operate, or intend to operate.

Finally, while displacement to irregular routes was considered, the tools available to the government to address irregular migration are different to those addressing visa-linked asylum claims. The government intends to address both issues, and further details of the government's plan to reduce illegal arrivals are set out in the Restoring Order and Control statement.

Q: ILPA argues that restricting visa routes because people may later claim asylum breaches the 1951 Refugee Convention, because personal circumstances and those in the home country can change significantly (the *sur place* argument). Please comment on this point.

A: While the Convention recognises that a person may become a refugee *sur place*, that principle concerns the assessment of protection claims once an

individual is present. It does not extend to persons outside a State's territory, or to individuals who do not currently meet the refugee definition but may do so in the future.

The Convention does not regulate visa policy, does not require States to facilitate entry, and does not oblige States to anticipate potential future protection needs, provided that individuals who are present are able to access asylum procedures and are protected against refoulement where the Convention criteria are satisfied. The ability of individuals already lawfully present in the UK to claim asylum, including on a sur place basis, will be unaffected by the changes.

Q: The submission cites the change as being a disproportionate reaction to the *perception* of abuse of the study route. Please comment.

A: The visa brake is a proportionate reaction to significant strain being placed on the asylum system through these specific routes.

As regards proportion, the evidence base which informed the brake used two primary criteria: The absolute number of visa-linked asylum claims; and the percentage of asylum claims as a proportion of visas issued. Proportion here explicitly refers to this evidence.

The primary justification for the visa brake is to reduce the strain on the asylum system. As regards perception, one of the further justifications for the visa brake, in addition to reducing the strain on the asylum system, was to strengthen public confidence in the immigration system, particularly when this confidence risks being undermined if the public perceives purpose-bound visa-routes, such as the Student route, as being used as routes to claim asylum in the UK.

Q: Para 5.2 states that the four countries "present some of the highest proportions of asylum claims to visas issued".

- **Are these statistics measured as: (i) the percentage of visa applicants that go on to claim asylum; or (ii) two separate numbers, ie the number of visas issued and the number of asylum claims? If the latter, why is that a useful statistic – the two groups could have very different drivers? It would also be helpful to comment on the Ukraine statistics highlighted at para 11 of the ILPA submission.**

A: The methodology used to select these nationalities for consideration of a visa brake is set out in the published Impact Assessment. As regards the proportion criterion, across a given time period, we calculated the number of asylum claims linked to a specific route as a percentage of all the Entry Clearance visas issued for that same specific route. To be clear, as stated in the IA and other documents, these are asylum claims that have been biometrically matched to the same specific route. It does not include claims linked to other legitimate routes or irregular routes.

This approach ensures a proportionate approach focussed on those routes and nationalities which present a substantial pressure on the asylum system through visa-linked asylum claims. The process for consideration of nationalities for the visa brake has been data driven from start to finish.

The Immigration Law Practitioners' Association's submission compares statistics for nationals of Ukraine and nationals of Afghanistan, and argues that "Ukraine presents one of the highest proportions of asylum claims to visas issued". This is incorrect.

To take 2025 Q4 as an example period: For nationals of Ukraine, the total number of asylum claims across all routes of entry was 135, whilst the total number of all Entry Clearance visas issued was 14,763. Asylum claims therefore as a proportion of all visas issued calculates as less than 1%. For nationals of Afghanistan, the total number of all asylum claims across all routes of entry was 1,249, whilst the total number of all Entry Clearance visas issued was 2,021. Asylum claims therefore as a proportion of all visas issued calculates as 62%.

These statistics are publicly available on gov.uk: [Immigration system statistics data tables - GOV.UK](#).

Q: Is it correct that the 2025 refugee grant rates at initial assessment were 93% (Sudan), 84% (Myanmar), 51% (Cameroon) and 36% (Afghanistan, with an increasing proportion of grants at appeal)?

- **If so, it appears that a high proportion of those arriving are 'genuine' refugees – why it is appropriate to reduce safe routes of travel for these people?**

A: The visa brake is fundamentally required to reduce the strain on the asylum system. Grant rates do not inform the visa brake nor is the visa brake intended to affect grant rates. Note that other legitimate pathways to the UK remain open for the affected nationalities. Additionally, as announced by the Home Secretary in her recent Restoring Order and Control speech, we will be opening new safe and legal routes. But Study and Work routes are not intended to be proxies for dedicated humanitarian routes.

There are also currently no Visa Application Centres (VACs) open in Afghanistan and Sudan. This means that any nationals of these countries who were applying to travel to the UK prior to the visa brake were already doing so not in Afghanistan or Sudan but in a safe country in which there was a VAC.

Grant rate statistics are publicly available on gov.uk: [Immigration system statistics data tables - GOV.UK](#).

Q: The IA describes how the visa brake will be for an initial 18-month period, but this is not mentioned in the EM until para 9.7 – it is entirely absent from the discussion in paras 5.1-5.4. This seems to me a key aspect of the policy.

- a) **Why was it not mentioned in that section?**
- b) **Could you please consider revising the EM to include a reference to this?**

A: (a) The 18-month period is first mentioned in the EM's Impact Assessment section because it provides a useful time period for modelling the brake's impact.

The brake will be reviewed after 18-months. However, there is no commitment to lifting the brake following this period. Whether the brake is lifted, maintained, or expanded, will depend upon the risk of high proportions of visa-linked asylum claims recommencing on the given routes from the given nationalities. As such, the timelines for releasing the brake are very likely to differ between nationalities, according to the levels of enduring asylum risk.

(b) There are currently no plans to revise the EM. There is no guarantee that the brake will be changed after 18-months. It is specifically referenced in the Impact Assessment section because it provides a useful time period for modelling the brake's impact.

Q: Has consideration been given to allowing students educated in venues such as accredited British international schools, taught in English by British-trained teachers and studying British qualifications, to retain the ability to apply for UK student visas?

A: This decision may be disappointing to nationals of these countries who are students at British international schools. However, the evidence is clear that the Student route for these nationalities has been a source of a high proportion of visa-linked asylum claims relative to visas issued. We have no plans, at present, to provide exceptions for individuals who studied at specific institutions or types of institution.

Q: The EM talks about considering more "nuanced interventions".

i) What would be the timing for such consideration?

ii) Could the change described above be an example of such a "nuance"?

A: The Home Office is in the process of developing further controls, restrictions and requirements on visa routes to further strengthen the integrity of the UK's immigration system and to bolster public confidence in a system which should enable talented students to study in the UK without seeing significant proportions of visas issued resulting in asylum claims. Details of these interventions will be released once they are ready to implemented.

Visa requirements for Nicaragua and Sri Lanka

Q: What percentage of (i) all asylum claims, and (ii) those made on arrival at port, were represented by each of these two countries in the Jan 2022 to Dec 2025 period?

A:

- (i) Nicaragua: between January 2022 and December 2025 there were 609 asylum claims from Nicaraguan nationals, from a total of 387,823 asylum claims for all nationalities over this period. This represents 0.16% of all

asylum claims. St Lucia: There were 360 asylum claims from St Lucian nationals over this period, representing 0.093% of all asylum claims.

- (ii) Nicaragua: there were 505 asylum claims made at port by Nicaraguan nationals over this period, from a total of 47,495 asylum claims made at port from all nationalities. This represents 1.06% of all asylum claims made at port. St Lucia: There were 128 asylum claims made at port by St Lucian nationals over this period, representing 0.27% of all asylum claims made at port. Published statistics on asylum claims can be found here: <https://assets.publishing.service.gov.uk/media/69958f76b33a4db7ff889d43/asylum-claims-datasets-dec-2025.xlsx>

Q: Have FATF or OECD commented on the St Lucia Citizenship by Investment programme?

A: The FATF and OECD continue to comment broadly on the risks associated with Citizenship by Investment (CBI) programmes, including those in the Caribbean region, and caution that they are vulnerable to exploitation by criminal actors. This includes publishing a report in 2023: [Misuse of Citizenship and Residency by Investment Programmes \(EN\)](#).

The FATF conducted a [mutual evaluation](#) of Saint Lucia in 2021. This had a much broader scope, but in summary, on CBI assessors "found the programme was vulnerable to terrorist financing", noting it was "promoted in jurisdictions with known terrorist activity" and that "applications are granted to people from these jurisdictions". A priority action was identified for Saint Lucia to "address the intelligence gaps (extent, nature and scale of money laundering/terrorist financing related criminality)", including in relation to its CBI programme. December 2024's follow up report records that "Saint Lucia has made significant progress in addressing the technical compliance deficiencies" since its mutual evaluation, with upgraded ratings across numerous recommendations, but it remains under enhanced monitoring.

The OECD monitors high-risk CBI programmes to support the effective implementation of the Common Reporting Standard (CRS). The OECD has [analysed](#) over 100 CBI and RBI (Residency by Investment) programmes offered by CRS-committed jurisdictions. Saint Lucia was identified as one of 21 programmes that "potentially pose a high risk to the integrity of CRS", noting that such programmes can be misused to hide offshore assets and facilitate tax evasion where they offer low or no personal income tax liabilities and require little or no physical presence in the jurisdiction.

Q: Given that asylum claims from these countries combined constitute around 0.25% of all asylum claims in Jan 22-Dec 25 (as per your previous answer), how is the argument that observing the 21-day rule could have triggered an "unpredictable and unmanageable strain upon the UK's migration and borders system" justified?

A: Travelling to the UK without the requirement of a visit visa and being eligible for an Electronic Travel Authorisation (ETA) is, by design, light touch and simple for genuine visitors. However, this means there is risk of abuse from non-genuine visitors as it can be used to travel to the UK without in-depth scrutiny of

an individual's intentions before travel. In comparison, a requirement to obtain a visit visa prior to travelling to the UK means that we can assess whether an individual is a genuine visitor and likely to comply with the Immigration Rules on arrival. It allows us to intervene and, where necessary, refuse a visa before the individual travels to the UK.

We have clear evidence that that the visa-free route to the UK has been used by Nicaraguan and St Lucian nationals to claim asylum, leading to relatively high levels of asylum claims from these visa-free nationalities at port. Any asylum claim made at port represents a significant case-working burden for Border Force and impacts border operations for managing the flow passengers and ensuring border security. Giving 21-days' notice, or any advanced notice that the visa-free route will be closed increases the likelihood of abuse from non-genuine visitors seeking to do so and may lead to a sudden and unpredictable increase in the patterns of behaviour we have already seen. At the end of 2025 , there were 483 Nicaraguan and St Lucian nationals receiving asylum support, including 466 individuals living in accommodation provided by the Home Office. The costs associated with an unpredictable increase as a result of a 21-day notice period could be significant and therefore the introduction of a visit visa requirement without a notice period is proportionate to protect the system from further strain. The action taken in respect of St Lucia and Nicaragua was established by previous visit visa impositions and therefore follows precedent.

We have mitigated against negative impacts for genuine visitors from the immediate introduction of the visit visa requirement by implementing a six-week transition period for those with pre-booked tickets and an ETA. This transition period is designed to prevent operational difficulties, general unfairness, and ensure that people who arranged travel before this announcement do not lose money. The length of the period (six-weeks) has been chosen to give those affected enough time to apply for and receive a visa and follows precedent established by previous introductions of visit visa requirements. The current standard processing time for applicants to receive a decision and, if issued, a visitor visa, is three weeks.

Disclosure of information relating to asylum claims when in the public interest

Q: What are the "serious criminal offences" that could trigger disclosure?

A: Serious criminal offences may involve any conviction which leads to a custodial sentence of 12 months or more, or pre-conviction, where the individual could face a custodial sentence of 12 months or more, should they be later convicted. It may also include a conviction for any Schedule 3 sexual offence which attracts the notification requirements, or pre-conviction, where such an offence could be a Schedule 3 sexual offence, if they are later convicted. The decision-maker will also consider this criteria to be met where a person has either been charged with a particularly serious crime or we have been advised that the person has been charged and the case is so high profile as to meet this threshold criteria, or that the person has been charged and there are significant cumulative offences sufficient to meet the disclosure criteria.

Q: Is it correct that the details of the 'public interest' test are only set out in the EM?

- **If so, how, from a scrutiny perspective, is this justified?**

A: Policy guidance on disclosure will be published by the Home Office in due course. Prior to the rules change the Home Secretary could already make disclosures in the public interest notwithstanding rule 339IA and therefore this is a textual amendment which does not impact the overall position but does bring further clarity and aligns the text of the rule with the UK GDPR and DPA. We don't want to get into this in this response but the reason we would take that view is that the phrase "for the purposes of examining individual applications for asylum" conditions the remainder of the rule.

"Public interest" is a well-established term often used in statute without further definition. The Home Office will issue guidance taking note of guidance issued by the ICO on the same topic. Prior to the change to the Immigration Rules/publication of a policy instruction, it is open to consider the disclosure of immigration status under the UK GDPR and Data Protection Act 2018, under which public interest is a lawful basis for processing personal data, especially by public authorities. Public interest means the welfare or well-being of the general public, often relating to transparency, accountability, safety, or the proper functioning of public services. Disclosure is in the public interest if it is necessary for:

- The performance of a task carried out in the public interest or in the exercise of official authority (Article 6(1)(e) UK GDPR).
- Substantial public interest conditions (e.g., preventing crime, protecting the public, administration of justice, safeguarding, etc.) (Article 9(2)(g) UK GDPR)
- The administration of justice, an activity that supports or promotes democratic engagement, the exercise of a function of a government department etc (Schedule 1 Part 2 of the Data Protection Act 2018).

The ICO and government guidance stress that public interest must be clearly identified, necessary, and proportionate. There must be a legal basis, and the processing or disclosure must be the least intrusive means to achieve the public benefit.

Article 9 UK GDPR highlights 'special categories' of personal data as particularly sensitive and requiring of additional protection. These include racial and ethnic origin. Immigration status is sensitive and therefore considered special category data. The sharing of such data for the purpose of disclosure of asylum seeker status will rely on the substantial public interest exception. It must be justified as necessary and proportionate, with appropriate consideration and records kept.

Q: Do you agree that disclosure carries risks, such as wider anti-migrant violence?

- **If so, how do you assess those risks and what is in place to mitigate them?**

A: The disclosure (or non-disclosure) of any special category or personal data carries risks that must be carefully evaluated. All information is assessed in the round when disclosure of immigration status is being considered. There will be occasions where the failure to disclose information such as the immigration status of an alleged offender, may serve to increase the prospect of misinformation circulating amongst a local community, which itself presents credible risks in increasing community tensions. This is a compelling consideration in the balancing exercise. In cases where a Police force or another public body have disclosed nationality and ethnicity, the Home Office must then consider whether it is appropriate to disclose information about immigration status. Article 6(1)(e) provides that processing is necessary for the performance of a task carried out in the public interest: as above, the public, including the media, has a right to expect candour, transparency and accountability from government departments.

Should any information be available to tip the consideration of disclosure into disproportionate rather than proportionate to disclose, disclosure will not be recommended. Information already in the public domain, whether disclosure is necessary to achieve a legitimate aim, whether disclosure is proportionate to the aim pursued, whether only the minimum necessary data is being disclosed, and whether there is no less intrusive way of achieving the aim, are part of every consideration, alongside the requisite balancing exercise.

Q: The EM's argument for this policy revolves around the levels of public and media interest. However, the 'public interest' test usually does not mean this, it means the public good. Indeed, 'what is of interest to the public' is specifically excluded from the test in information law – as [here](#).

- **Why is the level of public and media interest an appropriate factor in deciding whether to disclose?**
- **Why is it justified to have a test that is at odds with that used elsewhere?**

A: As above, the public interest test is appropriately considered and what the public may be interested in does not constitute part of any consideration.

Whether there is information in the media or an expectation of media interest determines the likelihood of information entering the public domain that requires accurate information provision and accountability by the Home Office, including the countering of misinformation and transparency.

The public interest test is compliant with the requirements of UK GDPR and Data Protection Act 2018, including being ICO-compliant.

English language requirements

Q: Could you please clarify how these changes relate to those in HC 1333. My understanding was that HC 1333 increased the required level from B1 to B2 for the Skilled Worker, High Potential and Scale Up routes, effective from 8 January 2026.

- a) Is it that the HC 1333 changes applied to visas, whereas these changes apply to settlement?**
- b) What impact is the increase in the threshold expected to have on the numbers of people being granted settlement?**

A: (a) Yes, that is correct. The HC 1333 applied to those applying for time-limited permissions in the affected routes. The new changes apply to settlement applications in the affected routes.

(b) The government has not made an estimate of the impact on future numbers of settlement applications and grants. The government does not have data on how far those affected would already meet the new requirement or will need to undertake additional learning to meet it. In addition, the change is just one of a number of significant planned changes to settlement requirements (see the government's Command Paper "A Fairer Pathway to Settlement" (CP 1448) which may also impact on settlement grants in coming years.

Q: Why have the changes to the English Language requirements not been accompanied by an impact assessment? This question applies regardless of the situation regarding the consultation, as per the next question, given that it is a significant change which could impact a large number of people.

A: As noted in the subsequent questions, while there is a significant volume of people in scope to be affected by the changes in the rules, the time before implementation, and the marginal increase in the standard of English required (B2 from B1 in 6-12 months) suggests that there is sufficient time for people to upskill and the potential impact of these changes was not large enough to warrant a full Impact Assessment to be produced .

While no Impact Assessment was produced for this change in isolation for the reason set out above, full Impact Assessments will still be produced for any fuller implementation of the Earned Settlement proposals, following the consultation. In one of these IAs, the impact of the changes in English Language requirements will be noted and the assessment of limited impact will be set out.

Q: Does the commitment to publish impact and equality assessments with the response to the consultation cover the changes to English Language requirements?

I do note the comment in the consultation that it does not cover the "suitability" and "integration" requirements under the "Eligibility for settlement: mandatory requirements" heading.

A: No, as the English Language changes were not subject to consultation, they are not in scope of this commitment.

However, if the impacts had been considered of a sufficient magnitude, an IA would have been produced in line with any other change to the Immigration Rules.

Q: If the English language requirements were not subject to consultation, why was this?

A: The Government set out its intention to increase the English language requirement for settlement from B1 to B2 level in most routes in the immigration White Paper published in May 2025. The consultation launched in November 2025 on the Government's proposals for an earned settlement scheme did not include questions about this planned uplift in the existing mandatory requirement, although it did include a question about a proposed earned reduction to the qualifying period for those meeting a higher level of English language proficiency (at C1 level).

Q: If the commitment does cover the English language requirements, why has it not been met?

A: N/A, as above.

The commitment to consult related to proposals to introduce an earned settlement scheme, not to already announced plans to increase mandatory English language requirements.

Q: Do you agree that the number of people affected might be c. 950,000?

A: The Home Office set out that between 1.3 million and 2.2 million people are estimated to settle in the UK between 2026 and 2030, with a central estimate 1.6m.

As these changes are expected to come into force from 26 March 2027 for the subset of applicants where the existing requirement is at B1 level, the affected cohort will be smaller than the above estimates. However, a figure in the hundreds of thousands in scope for this change is likely and may be as high as ~950,000.

However, many of these people will already speak the required standard of English and so would face no meaningful impact.

Q: Would it be the case that the people primarily affected by this would be those on the path to settlement but who have not yet achieved it, who are now subject to stricter requirements?

A: The changes affect both those who already on a path to settlement and those who in future may commence one.

Q: Will there be a disproportionate effect on vulnerable groups?

A: The Immigration Rules include provisions under which applicants for settlement may be exempted from meeting English language requirements on account of their physical or mental condition.

Some routes that make provision for vulnerable groups – for example, the Victims of Domestic Abuse route – do not apply an English language requirement to the main applicant.

For some potentially vulnerable groups e.g. those that face potential workplace exploitation, the Government's view is that English language proficiency may be a protection and reduce vulnerability, and the benefits of the requirement outweigh any impacts in applying it.

Q: Which sectors of the economy are most likely to be affected and to what extent?

A: As set out above, the expected impact of this change is not large enough to warrant a full Impact Assessment. As a result, there are unlikely to be significant effects on any sectors of the economy.

Q: Any other information you can provide on the impact of this policy would be helpful.

A: None, except to note that the new requirements do not become effective until March 2027. The Government recognises that it would be unreasonable to apply the uplift to those already on a pathway to settlement without providing those affected with sufficient opportunity to take any necessary steps to be in a position to meet the new requirements.

Child settlement to join a relative

Q: Briefly, what did the Court of Appeal find in Kone and why has it led to changes being needed in the Rules?

A: In Kone, the Court of Appeal found that a dependent child has a choice of whether to apply for settlement or permission to stay where only one parent is settled and the other parent has permission to stay in the UK, due to the broad drafting of Part 8 Immigration Rules. The policy intention is that a child should be able settle in the UK under paragraphs 297 and 298 of the rules when their last parent obtains settlement. The statement of changes clarifies that for a child to settle in the UK, both parents must have settlement, or, in cases where one parent has sole responsibility, that parent must be settled.

Q: Does this change to the rules introduce an inconsistency with Appendix Children (in the way described in para 25 of the ILPA submission)? If so, why is this appropriate?

A: With thanks to ILPA for their helpful comments. It is longstanding Home Office Policy that a child settles when both parents are settled but we acknowledge the amendment in the Spring 2026 Statement of Changes has misaligned Appendix Children and Part 8.

We will consider this further and review both Appendix Children and the wording in Part 8 to assess whether any refinements are required. We will take steps to ensure children are not disadvantaged by this misalignment whilst we review

Ukraine Permission Extension Scheme

Q: With this change, is it correct that anyone on the UPE, assuming an extension is accepted, would be eligible to remain in the UK until August 2028?

A: Anyone in the UK under the UPE scheme is eligible to apply for a further 24 months' permission to stay under UPE. The earliest existing UPE permissions will begin to expire in August 2028. This additional permission runs from the date the individual submits their application, rather than a single fixed date for all applicants.

Q: The EM refers to the IA as stating that the numbers expected to apply for the extension are 110,000 to 200,000. However, I cannot see these numbers in the IA, which suggests that 165,000-195,000 people would be eligible, with 90-100% actually applying (Table A1, para 26b, Figure 1).

a) Which are the correct numbers?

b) Assuming the IA is correct, it is likely that it will be necessary to correct the EM for this point (as well as others discussed elsewhere).

A: (a) Although 165,000-195,000 are eligible to apply for UPE, it is estimated that between 110,000- 200,000 (rounded to nearest 5,000) will actually apply – page 39 of IA.

(b) Both estimates are accurate – one relates to numbers eligible to apply; one relates to numbers expected to apply. No need to 'correct'.

Q: The 2024 Impact Assessment on the UPE said that "if asylum or humanitarian protection applications from Ukrainians reach volumes in the high hundreds in 2025 or 2026 it may at least suggest reviewing whether the UPE route is functioning as intended." The latest stats (Table 1) suggest that the 2025 numbers were in fact over 1,000.

a) Has a review therefore been initiated?

i) If so, please provide details (eg on the expected timing and whether the results will be published).

ii) If not, please explain why not and what circumstances would actually trigger such a review.

A: (a) i) No.

ii) The statistics in the IA cover the year ending September 2025 and therefore include pre-UPE volumes. Since UPE was introduced, the number of asylum applications has not reached 1,000.

Consultations

Q: At least some of the changes in the Statement are impactful and described as “significant”. In those circumstances:

- a) why would a public consultation have been disproportionate?**
- b) was any informal consultation undertaken with representative groups? If so, what feedback was received and what account was taken of it? If not, why not?**

A: (a) Although some changes are considered “significant” and with various degrees of impact, it is important to put that meaning into context for the change in question as those factors on their own do not always result in a justification for a public consultation.

(b) No / N/A

Q: Why is the Simplification of the Rules Review Committee no longer consulted on changes?

A: We are currently engaging with the team with responsibility for the Review Committee and will revert back to you regarding this.

Safe return review

Q: The ILPA submission argues that, while the EM characterises this as a “clarificatory change [...] operational processes will remain unchanged as this is already part of existing policy”, this change will, in practice, lead to the need for greater evidence preparation and further strains on legal advice. Please comment.

A: The safe, return review is a long-standing policy included in the Settlement Protection policy guidance. Claimants have also been signposted to seek legal advice following receipt of a Notice of Intention, which is sent when the Home Office is reviewing and considering revoking their protection status. This is not a new policy or process, although the volume of revocation decisions may change depending on country situations around the world.

Youth Mobility Scheme

Q: Please provide the previous quotas for each country and comment on the reasons for any significant changes

A: These are found in the Immigration Rules currently in effect at Appendix Youth Mobility Scheme: eligible nationals.

The maximum total allocation of places available for use by nationals or citizens of countries and rightful holders of a passport issued by territories participating in the Youth Mobility Scheme in 2025, are as follows:

- Andorra - 100 places
- Australia – 42,000 places
- Canada – 10,000 places

- Hong Kong - 1,000 places
- Iceland – 1,000 places
- India - 3,000 places
- Japan - 6,000 places
- Monaco – 1,000 places
- New Zealand – 9,500 places
- Republic of Korea - 5,000 places
- San Marino – 1,000 places
- Taiwan – 1,000 places
- Uruguay - 500 places

The YMS operates on a quota basis, is kept under annual review and can be amended to account for demand. Typically, inbound quotas are based on a yearly review of outbound UK participants of the scheme.

Procedure and Rights of Appeal changes for Failed Asylum Seekers

Q: What is the benefit of having the Further Submissions process set out in the Rules, rather than in guidance?

A: Validity Requirements: Setting the Further Submissions process out in the Immigration Rules places existing policy on a statutory footing, strengthening transparency. Whilst current guidance sets out who can make further submissions, it does not specify the consequence of not meeting those requirements; the Rules allow us to explicitly state that a submission may not be considered or treated as invalid if validity requirements are not met.

Implicit Withdrawal: Implicit withdrawal is a new provision. Previously, there was no legal basis to treat further submissions as withdrawn where an individual disengaged from the process. Setting this out in the Immigration Rules provides a clear statutory basis to do so.

Q: In transferring the process from guidance to Rules, have any changes been made to the requirements that an individual must meet? If so, please explain.

A: Validity Requirements: No changes have been made to the requirements that an individual must meet in order to make further submissions. The move from policy guidance into Immigration Rules places existing policy requirements on a statutory footing and makes explicitly clear how further submissions may be treated if validity requirements are not met i.e., they may not be considered or be treated as invalid.

Implicit Withdrawal: Implicit withdrawal is a new provision that allows further submissions to be treated as withdrawn where an individual disengages with the process. Individuals have always been expected to comply and engage appropriately, but the Rules now make clear that there are explicit requirements such as maintaining contact with the Home Office and responding to requests for information that must be met. The change clarifies that failure to meet these requirements may now result in their further submissions being withdrawn.

Other

Q: Is it correct that there is an error in the revised Rules I APP SW4, new SW14.3B(d), where SW14.2(a) should read SW14.2A? If so, what is the significance of that?

A: Yes, this is an error and it's already on our list to correct in a future SoC. It should read SW14.2A(a).

Refugee family reunion (RFR)

Q: Could you provide an update on these changes please? As [the Committee reported in October 2025](#), the Government said that it aimed to have (some of) the wider family migration policy changes in place "for the spring" and that "we intend to reopen the [RFR] route in the Spring 2026".

- **What is the expected timing on these wider changes?**
- **What is the position on the RFR route?**
- **The Committee also requested that regular impact data is published throughout the suspension period. Has any such data been published? If not, why not?**

A: The new family policy is still under development and is being looked at alongside wider changes stemming from both the Immigration White Paper and Restoring Order and Control Paper published on 17 November 2025. It is essential that we have a coherent and managed immigration system and that any new family policy is consistent with the introduction of Earned Settlement, Core Protection as well as domestic reform to the application of Article 8 of the ECHR.

Appendix FRP remains suspended to new applications. In November 2025, the Government published the Restoring Order and Contril statement, which set out the intention that family reunion rights for refugees would no longer be automatic. This reflects the Government's wider intention to bring greater fairness to the wider family policy system. These reforms remain under consideration and the Government will announce future reforms in due course.

The Government publishes quarterly data on a wide range of areas across the migration and borders system. On 26 February, the latest version of this data was published and can be found at the following link – it confirms that 2,765 grants of refugee family reunion were issued in the final quarter of 2025, covering the time of the pause - [How many people come to the UK via safe and legal \(humanitarian\) routes? - GOV.UK](#). The Government has not committed to publishing any other data on refugee family reunion. However, the Home Office will be monitoring the impact of the pause.

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