

WORK RIGHTS CENTRE - SUPPLEMENTARY EVIDENCE SUBMISSION

February 2026

ABOUT WORK RIGHTS CENTRE

Work Rights Centre is a registered charity dedicated to supporting migrants and disadvantaged Britons to access employment justice and improve their social mobility. We do this by providing free and confidential advice in the areas of employment, immigration, and employability, and by mobilising frontline intelligence to address the systemic causes of migrants' inequality. The charity was founded in 2016. Ever since, we have advised over 6,000 people, helped recover over £650,000 in unpaid wages and fees, and supported hundreds more to make job applications and secure their immigration status.

Summary

The Work Rights Centre fundamentally rejects the government's 'earned' settlement proposals. The current system already achieves the stated policy objectives of social cohesion and contribution. The proposed changes will undermine integration, increase poverty, fuel exploitation and cause significant economic harm. Further, the lack of Impact Assessment renders this consultation procedurally flawed.

The government proposes doubling the baseline settlement period from 5 to 10 years, with even longer waits (15–20 years) for refugees and lower-paid workers like care staff. The government justifies these reforms by claiming migration is too high and contribution too low. However, evidence shows:

- **Migration is already falling** and is projected to fall further, due to a recent series of policy restrictions increasing minimum salary thresholds, limiting eligible roles for sponsorship, and reducing migrants' abilities to bring dependants.
- **Integration is happening.** The vast majority of migrants already speak fluent English and are employed, including in sectors that struggle with labour shortages.
- **Migrant's fiscal contribution is positive.** Migrants on the Skilled Worker visa, including in medium-skill roles make a net positive contribution to public finances. Care workers fill vital labour shortages that enable broader economic activity.

This "earned settlement" model penalises the most vulnerable while offering accelerated routes only to the highest earners. We identify four major areas of harm:

- **Increased Exploitation.** Extending the time migrants are tied to employers on temporary visas drastically increases the risk of labour exploitation and modern slavery, as workers lose bargaining power and the ability to leave abusive employers.
- **Poverty and Destitution.** Prolonged exclusion from public funds (NRPF) and the high costs of repeated visa renewals will push thousands of working families into poverty. This increases the risk of homelessness and shifts costs to local authorities.
- **Barriers to Integration.** Academic evidence confirms that delaying permanent residence hinders social and economic integration. By creating a class of "perpetual temporary" residents, the government fosters social isolation rather than cohesion.
- **Fiscal and economic harm.** The proposals risk damaging public finances by pushing migrants into the underground economy, shifting welfare costs to local authorities, and making British businesses less competitive. A 10–15 year route to settlement would make the UK an international outlier, far stricter than Germany, France, Canada, and Australia, which typically offer settlement after 3–5 years.

The government's proposals risk creating a permanent underclass of temporary residents who are socially excluded and legally precarious. These proposals also undermine the government's broader policy objectives to grow the economy, reduce child poverty and halve Violence Against Women and Girls, and are likely to disadvantage protected groups and thus become subject to legal challenges.

1. We are deeply concerned by the Home Secretary's proposals.
2. This submission looks in more detail at: (i) what the government is proposing, (ii) why the stated policy aims are already being achieved, (iii) the harm derived from the unintended consequences of these proposals, (iv) the failure to publish an impact assessment and (v) the broader view of public attitudes towards migration and their impact across the UK.
3. We have further compiled a comparative analysis of settlement routes in other European and Commonwealth countries ([Appendix I](#)) to demonstrate how the UK will become an outlier by implementing the harshest and most onerous route to citizenship.

i. What are the Proposals?

4. To achieve its objectives of reducing migration and increasing contribution, the government is proposing to:
 - increase English language requirements from B1, the current level, to B2;
 - impose a new requirement for migrants to earn above a certain threshold (£12,500/year subject to consultation) for 3-5 years before settlement; and
 - double the baseline qualifying period to settlement for most people* from the current 5 years to 10 years, while simultaneously introducing a set of criteria that would reduce - or radically increase - a person's journey to settlement on a case-by-case basis.
5. Under this 'time adjusted' settlement model, the new standard 10 year baseline to settlement would be:
 - shorter for high earners, highly proficient English speakers (at C1 or above), family members of British citizens, BN(O) visa holders, people on the Global Talent and Innovator Founder visas, migrants employed in certain public service occupations, and vulnerable groups (which remain to be defined) – who are seen as having contributed more, or having a closer connection to the UK; and
 - significantly longer for applicants who have been in receipt of public funds at any point during their stay in the UK (who face an additional 5 to 10 year wait), and for applicants who arrived in the UK illegally, on a visit visa, or who overstayed (and who face an additional 20 years). They are effectively penalised for appearing to contribute less.
6. Notably, two groups are singled out for starting with an even longer baseline, that far exceeds the proposed new standard 10 years:
 - refugees face starting with a 20 year baseline - meaning that a person who entered the UK on a visitor visa and was subsequently granted asylum could wait as many as 40 years;
 - care workers and migrants on Skilled Worker visas employed in medium-skilled roles (below RQF Level 6), face starting with a 15 year baseline.

7. Alongside reconfiguring settlement routes the consultation also raises the question: what rights are provided as a result. Specifically, that benefits should not be available to those with settled status. Further, whether public funds should instead be reserved exclusively for British citizens.
8. Crucially, the Home Secretary proposes to widely apply these changes to everyone who has not already received indefinite leave to remain (ILR). This application means those who would have applied within years or even months are now subject to the new requirements – as soon as the immigration rules have changed, so will the goalposts.
9. The only groups who remain out of scope of this consultation and planned reforms are people who can qualify for settled status under the EU Settlement Scheme (EUSS), those eligible under the Windrush Schemes, children in care and care leavers.

ii. The stated policy aims are already being achieved

10. Home Secretary Shabana Mahmood opens the consultation document with two primary objectives of the proposals on settlement and citizenship.¹
11. The first objective is to improve social cohesion, which has been allegedly undermined by high levels of migration under the previous Conservative government, particularly under the Health and Care Worker visa. The second objective is to ensure migrants contribute and integrate in the UK. This, she argues, requires moving away from the current model, where settlement is near ‘automatic’, to a new model where settlement is a privilege that must be ‘earned’.
12. We are deeply concerned by the Home Secretary’s proposals, and the disconnect between their stated aims and likely outcomes. The evidence suggests that the government’s stated aims of social cohesion and positive contribution are already being achieved in several ways:

Immigration has been decreasing and is projected to decrease further.

13. Due to successive restrictions in immigration policy, both work immigration² and family-based immigration³ have been decreasing over the last two years. The decline has significantly reduced net migration to the UK, from 944,000 in the year ending March 2023, to 204,000 in the year ending June 2025.⁴
14. The number is projected to decrease even further.⁵ In July 2025, the Home Office banned overseas recruitment of care workers and many medium-skilled workers on the

¹ <https://www.gov.uk/government/consultations/earned-settlement/a-fairer-pathway-to-settlement-statement-and-accompanying-consultation-on-earned-settlement-accessible>

² <https://www.workrightscentre.org/publications/2025/with-skilled-worker-visa-numbers-in-decline-what-s-the-cost/>

³ <https://www.gov.uk/government/statistics/monthly-entry-clearance-visa-applications-december-2025/monthly-entry-clearance-visa-applications-december-2025#family-visas>

⁴ <https://migrationobservatory.ox.ac.uk/resources/briefings/long-term-international-migration-flows-to-and-from-the-uk/>

⁵ <https://ukandeu.ac.uk/the-coming-collapse-in-immigration/>

Skilled Worker route. Then, recruitment costs were increased for businesses following a December 2025 rise in the Immigration Skills Charge (ISC). Finally, on 8 January 2026 the Home Office introduced a B2 English language requirement (A-level equivalent) for the Skilled Worker route, a significantly higher threshold than the previous B1 requirement.

15. The Home Office suspended the refugee family reunion route on 4 September 2025. And for both family and private life applications, the Home Office instituted more stringent suitability requirements from November 2025 - all with the cumulative effect of reducing immigration.

Migrants already speak English and work at a level that supports integration.

16. Home Office research on the Skilled Worker route found that most visa holders (86%) feel they are already integrating well into UK life.⁶ The assertion is not surprising, given main applicants were subject to evidence of B1 level English, and a right to remain in the UK secured through employment. Indeed, 82% of Skilled Worker visa holders also reported knowing English 'very well'. This consensus is broadly consistent with Migration Observatory analysis of Census 2021 data for all immigrants in England and Wales, which showed that an overwhelming majority of adult migrants spoke English 'well' or 'very well'.⁷
17. Migrants also improve their English skills over time. The Migration Advisory Committee's annual report highlights this improvement reflected in Census 2021 and Understanding Society data. The latter reveals that "most migrants who reported difficulty speaking English at the first survey reported improvement 7-10 years later."⁸
18. In the face of existing data and evidence: introducing a stringent B2 English eligibility criterion would be disproportionate and unnecessary.
19. The notion that migrants are not already contributing enough is also wrong. Most migrants must have a job offer from a Home Office approved employer before they can qualify for a work visa. Where permitted to bring a dependant partner, the evidence suggests that 71% of Skilled Worker route dependants were in work, while just 8% were neither working, nor looking for work.⁹ Analysis of immigrants who arrived in the UK to join a family member also finds strong labour market participation in this cohort.¹⁰ For those with 10 or more years' residence, the employment rate for women is only 8pp lower than for their UK-born counterparts, while for men the difference is just 2pp.

⁶ <https://www.gov.uk/government/publications/skilled-worker-route-evaluation/skilled-worker-route-evaluation>

⁷ <https://migrationobservatory.ox.ac.uk/resources/briefings/english-language-use-and-proficiency-of-migrants-in-the-uk/>

⁸ <https://www.gov.uk/government/publications/migration-advisory-committee-annual-report-2025/migration-advisory-committee-mac-annual-report-2025-accessible#chapter-3-english-language-and-integration>

⁹ <https://www.gov.uk/government/publications/skilled-worker-route-evaluation/skilled-worker-route-evaluation#dependants-on-skilled-worker-visas>

¹⁰ <https://migrationobservatory.ox.ac.uk/resources/briefings/family-migration-to-the-uk/>

Moreover, after 10 or more years' residence, the differential in annual earnings between the migrant and UK-born cohorts was very minor.

20. Overall, the implication that migrants are insufficiently integrating or leading separate lives is not borne by the evidence.

Most migrants on a Skilled Worker visa already make a net positive fiscal contribution

21. Most migrants coming to the UK after Brexit have done so on the Skilled Worker visa. This route requires applicants to have a job offer with a Home Office approved employer, and meets strict salary and skill requirements. The consultation document cites figures from the Office for Budget Responsibility's 2024 report, but the more recent Migration Advisory Committee's report on lifetime fiscal impacts of Skilled Workers finds that:¹¹

- Migrant workers on the main Skilled Worker visa are projected to have a substantially positive lifetime fiscal contribution of £689,000 per person.
- Even the lowest decile of earners on the main Skilled Worker visa route is projected to have a net positive fiscal impact over their lifetimes.

22. Care workers are also expected to have a net positive or neutral fiscal impact for the majority of their lives. The caveat is care workers are the lowest earners on the Health and Care Worker visa and seem to have a net negative impact overall due to the low level of wages in the sector. The Migration Advisory Committee's analysis does not account for career progression and associated increases in salaries, and fails to consider the impact of the government's plan to institute a Fair Pay Agreement under the Employment Rights Act in England,¹² which would further increase salaries in the care sector.

23. Perhaps more importantly, migrant care workers make a critical contribution to recipients of care, which is not captured in fiscal analysis alone. As Peter Prinsley MP remarked in an oral evidence session of the Commons Home Affairs Committee:

There is a sort of political mood that immigration is terrible and something must be done to reduce it. I do not think that we are sufficiently clear with the public about the trade-offs. A trade-off that occurs to me is that your elderly relatives might have nobody to look after them.

I think that is a story that we ought to be able to tell.¹³

¹¹ https://assets.publishing.service.gov.uk/media/6938108633c7ace9c4a41e42/The_Fiscal_Impact_of_Immigration_Final__1_.pdf

¹² <https://www.gov.uk/government/consultations/fair-pay-agreement-process-in-adult-social-care/fair-pay-agreement-process-in-adult-social-care-consultation-document>

¹³ <https://committees.parliament.uk/oralevidence/16648/pdf/>

Care workers plug a significant labour gap

24. By the government's own logic, contribution to the UK is a multi-layered social phenomenon and not measured by fiscal impact alone. This is where care workers, one of the groups singled out for a draconian increase in the baseline wait (to 15 years), stand out for being most unjustly penalised.
25. The social care sector is grappling with significant recruitment and retention challenges. Data from the England adult social care sector shows that as of December 2025, the vacancy rate stood as high as 6.4%, while for care worker roles it was at 7.7%¹⁴ - far higher than the national average of 2.3% in November 2025.¹⁵ The numbers of posts filled by British citizens in the sector fell by 60,000 (5%) between March 2022 and March 2025,¹⁶ and the government's long-awaited reforms to the sector are not expected to take place before 2028.¹⁷
26. Migrant workers plug a significant labour gap. A robust labour force of carers, in turn, can support unpaid family carers to return to work, consequently reducing their reliance on welfare.¹⁸ Carers can further reduce discharges and emergency admissions in the NHS by ensuring that at-risk individuals are cared for in a controlled external setting.¹⁹ Penalising migrant care workers with a longer route to settlement is not only ignoring these important contributions – the penalties undermine the care sector as a whole.
27. We also note the Home Secretary's assertion "fraud, as any constituency Member of Parliament can tell you, was rife". She notes that an attempt to fill between 6,000 and 40,000 jobs resulted in 616,000 arrivals between 2022 and 2024, and uses this figure to justify introducing a higher 15-year baseline route to settlement for care workers.
28. But this profound misreading of the data conflates victims and perpetrators.
29. The number of visas cited, 616,000, represents the number of Health and Care Worker entry clearance visas awarded *overall* in the period 2022-2024, including care workers, but also nurses, doctors and other medical professionals and their dependants.²⁰ Only 157,000 visas (a quarter of the figure cited by the Home Secretary), were awarded to main applicants for roles in Caring Personal Services.²¹ While the Home Office does not publish data on the number of dependants associated with care workers, it previously

¹⁴ <https://www.skillsforcare.org.uk/Adult-Social-Care-Workforce-Data/workforceintelligence/Trackers/Recruitment-and-retention.aspx>

¹⁵ <https://www.ons.gov.uk/employmentandlabourmarket/peoplenotinwork/unemployment/datasets/vacanciesbyindustryvacs02>

¹⁶ <https://www.skillsforcare.org.uk/Adult-Social-Care-Workforce-Data/workforceintelligence/resources/Reports/National/The-state-of-the-adult-social-care-sector-and-workforce-in-England-2025.pdf>

¹⁷ <https://www.gov.uk/government/news/500m-for-first-ever-fair-pay-agreement-for-care-workers>

¹⁸ <https://www.carersuk.org/reports/state-of-caring-2025-the-cost-of-caring-the-impact-of-caring-across-carers-lives/>

¹⁹ https://www.independentage.org/sites/default/files/2016-05/IA%20Moved%20to%20care%20report_12%202011%202015.pdf

²⁰ <https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables#entry-clearance-visas-granted-outside-the-uk>

²¹ <https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables#sponsored-work-visas-by-occupation-and-industry>

reported that in the year ending September 2023, approximately 120,000 dependants were associated with the 101,000 visas issued to main applicants.²² Assuming this ratio - which fails to take into consideration a ban on dependants that came into effect 11 March 2024 - just 187,000 visas would have been issued to dependants in 2022-2024.

30. In total, the number of visas issued to care workers and their dependants is significantly lower than 616,000 quoted in the government's paper.
31. Similarly, Skills for Care data from March 2025 puts the number of vacancies in England's adult social care sector at 111,000, most of which were for direct care roles - lower than the peak of 152,000 in March and still significantly higher than the 6,000-40,000 figure cited by the Home Secretary.²³ Data from Skills for Care only covers the England adult social care sector, so the number of vacancies is higher, once those in (i) children's social care, (ii) private care sector, and (iii) devolved nations are added. The figures cited by the government are simply incorrect.
32. The implication that migrant care workers were responsible for visa fraud is also worrying. While true that many migrant care workers *fell victim* to recruitment scams, and were never allowed to take up the jobs they were promised, the government's proposals gloss over the fact that these scams were enabled by the Home Office's own failure to ascertain the credentials of employers entrusted with sponsorship.
33. The Home Office initially awarded licences with little scrutiny: the number of employers with a licence to sponsor doubled in just two years, from 6,100 in Q1 of 2022, to 13,800 in Q4 2023²⁴. The Home Office subsequently increased enforcement action.²⁵ Between July 2022 and December 2024, the government revoked more than 470 sponsor licenses in the care sector, displacing 39,000 sponsored workers in the process.²⁶
34. Regrettably, these proposals do nothing to compensate these migrant care workers - who came in good faith, and made life-changing investments for the opportunity to work in the UK. These workers were tricked by rogue employers, left indebted, and prevented from working by a system that insists on tying them to another sponsor. These proposals punish them and all other care workers (including those who were and are still employed in the adult social care sector), by putting settlement and the prospect of security further out of reach.

Lower prospects of integration

35. This policy model puts migrant workers on temporary status for years, meaning the government is inadvertently hindering their ability to integrate. There is ample evidence to that effect.

²² <https://www.gov.uk/government/news/home-secretary-unveils-plan-to-cut-net-migration>

²³ <https://www.skillsforcare.org.uk/Adult-Social-Care-Workforce-Data/workforceintelligence/resources/Reports/National/The-state-of-the-adult-social-care-sector-and-workforce-in-England-2025.pdf>

²⁴ <https://www.workrightscentre.org/media/uvrdwteg/report-published-24042025-safeguarding-sponsored-workers.pdf>

²⁵ https://assets.publishing.service.gov.uk/media/6602a6b765ca2fa78e7da854/An_inspection_of_the_immigration_system_as_it_relates_to_the_social_care_sector_August_2023_to_November_2023.pdf

²⁶ <https://www.gov.uk/government/news/new-rules-to-prioritise-recruiting-care-workers-in-england>

36. According to the Migration Observatory analysis of the government's proposed changes to settlement, "there is evidence that longer periods of time without the rights that come with permanent status and citizenship may somewhat hinder social and economic integration."²⁷ Several academic studies support this point.

- In a study of highly skilled temporary workers in the United States, Lowell and Avato find that initial visa status limits later earnings growth - notably by reducing migrant workers' bargaining power, and limiting their professional mobility.²⁸
- Research from Denmark found that the employment rate of refugees affected by a restricted path to permanent residency in 2007, decreased by 30%, "while their average language proficiency remained largely unchanged."²⁹
- In their analysis of Danish refugee policies adopted over the course of four decades, Dustmann *et al.* find that policies "that regulate access to welfare benefits or use permanence of residence to incentivise skill investment, while beneficial for some, create disadvantages for others."³⁰
 - Notably, policies promoting integration by tightening eligibility for permanent residence or citizenship only achieve their intended effect if the bar for obtaining permanence is not too high. Once settlement becomes too difficult, more severe requirements can lead to lower labour market performance.
- Analysis of immigrants in Swiss cantons found that access to citizenship "strongly improved long-term social integration," and that "integration returns to naturalisation are larger for more marginalized immigrant groups."³¹ Looking across several European countries, Gathmann and Garbers find that "faster access to citizenship increases take-up and improves the economic, educational, political³² and social integration of immigrants."³³

37. Experts who gave evidence to parliamentary committees echoed the observation that putting settlement out of reach limits integration:

- Dr. Madeleine Sumption, noted before the Home Affairs Select Committee: "The trade-off that Brian mentioned [the trade-off between having fewer settled migrants and having poorer migrant households] is an integration trade-off. In the short run, if you make it harder for people to get settlement and you restrict their access to benefits, you get that short-run financial benefit. In the longer term, there is a surprising amount of evidence from other countries that having access to a

²⁷ <https://migrationobservatory.ox.ac.uk/resources/commentaries/changes-to-settlement-what-do-they-mean/>

²⁸ <https://onlinelibrary.wiley.com/doi/abs/10.1111/imig.12133>

²⁹ <https://www.iza.org/publications/dp16313/permanent-residency-and-refugee-immigrants-skill-investment>

³⁰ <https://cepr.org/voxeu/columns/refugee-migration-and-labour-market-lessons-40-years-post-arrival-policies-denmark>

³¹ <https://www.cambridge.org/core/journals/american-political-science-review/article/abs/catalyst-or-crown-does-naturalization-promote-the-longterm-social-integration-of-immigrants/F46D864B22AD8C71D5ED1B0DE2FFB4CA>

³² Older evidence using Understanding Society data shows a negative impact of naturalisation on political integration in the UK. However, this would be based on a cohort different to that affected by the Home Secretary's proposals - <https://www.understandingsociety.ac.uk/blog/2019/02/19/becoming-a-uk-citizen-does-it-make-people-happy-and-integrated/>

³³ <https://www.sciencedirect.com/science/article/abs/pii/S0927537123000180>

permanent status and then going on to citizenship is beneficial for both economic and social integration. People earn more when they move on to citizenship. That is not necessarily what you would expect, but there are quite a lot of studies that show it. There is a risk of undermining integration by making people wait longer."³⁴

- Professor Alan Manning, noted in oral evidence before the Justice and Home Affairs Committee: "We have studies where Governments have imposed unrealistic conditions on, for example, getting permanent residence and people then just give up. But we have other studies where they have put more realistic conditions in place and that has induced people to behave in ways that involve better economic and social integration."³⁵
- Professor Ricky van Oers, noted in oral evidence before the Justice and Home Affairs Committee: "Three important drivers for integration are: security of residence and protection against expulsion; equal treatment comparable to other citizens in crucial domains such as education, the employment market and housing; and family reunification. States that create these three measures create a climate in which integration can successfully take place. If these conditions are not present—notably, security of residence and protection against expulsion—it is difficult for a new group to integrate, and any measure taken to promote integration will fail because the basic conditions are not present in those cases."³⁶

Integration risks for care workers

38. We echo these concerns. Employability advisers at the Work Rights Centre have been increasingly inundated with enquiries from migrant care workers on employer-sponsored visas, who were looking to change employers - having fallen victim to recruitment scams, or having experienced exploitation by their visa sponsor.
39. Even with professional advice, supporting the change of sponsor has proven significantly more difficult than supporting service users who had the unrestricted right to work. The pressure to find another sponsor, and make and pay for another visa application before they could take up a full-time position, was a significant barrier to employment.
40. Anecdotally, we also found that many employers were put off by the numerous immigration policy changes (notably the recent increases in minimum salary requirements and restrictions on the roles eligible for sponsorship). Many were reluctant to make the significant upfront cost of sponsorship. The majority of workers were able to find a partial solution: casual employment and work the additional 20h/week permitted by the Home Office. But workers consistently struggled to find full-time work with a new sponsor.
41. The government's only public-facing attempt to re-match care workers 'displaced' by sponsor licence revocation into new sponsored roles was largely unsuccessful. Our report on this programme found the same business and worker-side challenges to

³⁴ <https://committees.parliament.uk/event/24901/formal-meeting-oral-evidence-session/>

³⁵ <https://committees.parliament.uk/oralevidence/16789/html/>

³⁶ <https://committees.parliament.uk/oralevidence/16928/html/>

securing employment that we observed in our casework.³⁷ FOI data obtained by the Work Rights Centre shows that as of 31 July 2025, a total of 30,170 care workers were 'displaced', but only 1,825 (6.1%) were successfully rematched with a new sponsor via the programme by 31 August 2025.³⁸

42. These prolonged periods of involuntary unemployment and under-employment pushed many care workers into financial precarity, damaged their mental health, and dampened their confidence - limiting their ability to integrate.

iii. The settlement proposals will likely have adverse impacts

43. We are deeply concerned by the likely unintended consequences on migrant exploitation, poverty, integration and fiscal costs.

Labour exploitation - the risk of extending sponsorship ties

44. Many of the migrants on an extended track to ILR would be Skilled Worker visa holders, particularly those in occupations below RQF Level 6 (e.g. care workers), whose baseline qualifying period is proposed to be 15 years.³⁹ This lengthening would tie them to their sponsoring employer for an extended period of time, grossly increasing the likelihood of exploitation.
45. A vast amount of literature, including by the Work Rights Centre, journalists, government bodies, and parliamentary committees, has found that sponsorship carries the increased risk of labour exploitation.
46. Employers can use the prospect of visa curtailment to pressure migrant workers into working longer hours, insufficient pay, or working conditions that breach labour laws and contractual arrangements. Similarly, sponsored workers are often reluctant to report cases of labour non-compliance, knowing that doing so can lead to visa curtailment - and that changing sponsors is both practically difficult and expensive.
47. By putting settlement further out of reach, the government will extend the time that migrants spend on employer-sponsored visas, exacerbating the risks inherent in sponsorship.

Poverty - by increasing visa costs and extending NRPF

48. Extending the qualifying period to ILR effectively means many people will have to make more visa renewal applications before they can settle in the UK. This additional burden comes with significant costs, including visa application fees payable for the main applicant and any dependants. As well, applicants must pay the Immigration Health

³⁷ <https://www.workrightscentre.org/publications/2025/no-match-why-funding-rematching-hubs-for-displaced-migrant-care-workers-is-not-enough-to-tackle-exploitation/>

³⁸ FOI2025/12844 (Home Office), FOI2025/05731 (Home Office), and FOI-1642585 (DHSC)

³⁹ <https://migrationobservatory.ox.ac.uk/resources/commentaries/changes-to-settlement-what-do-they-mean/>

Surcharge (IHS) - a fee for NHS services payable upfront by most migrants, for every year they intend to spend in the UK.

49. As an example, as of 19 January 2026, a family of three (one parent as the main applicant, with their partner and one child) looking to renew their Skilled Worker visas for another three years, would be looking to pay as much as £13,791 upfront (£8,538 for the IHS and £5,253 in visa fees).
50. For the Home Office, this model is extremely lucrative. The National Audit Office reports that in 2023-2024 the Home Office raised an estimated £437.9 million in visa fees on the Skilled Worker route, while application processing costs were just £109 million.⁴⁰
51. For migrant families however, this expense can wipe out savings. Most visa routes implement a condition removing access to public funds, also known as No Recourse to Public Funds (NRPF). The NRPF condition combined with the increasing visa fees together risk throwing migrant families into poverty.
52. IPPR, Greater Manchester Immigration Aid Unit and Praxis conducted a survey of 314 people who were subject to the NRP condition on a 10-year route to settlement, which found that a sizable share struggled to meet the costs of utility bills (62%), food (57%) and housing costs (43%).⁴¹ Almost half of respondents (41%) were forced to borrow from friends or family to pay for the costs of their visa application, while three-quarters would not be able to apply for permanent residency even after they have fulfilled all the criteria, because they simply could not afford the fee.
53. Imposing a minimum income requirement risks some people never qualifying for settlement (e.g. single parents who are more likely to be women,⁴² unpaid carers, or people who struggle with illness and disability).
54. In the worst cases, making visa renewals too costly does not just lead to poverty, but risks pushing some into irregularity. The resulting downward spiral of loss of right to work, rent, or study, where the risk of exploitation is acute, further diminishes possible integration and the only way out is via complex immigration applications.

Increase in complex case volume for the Home Office

55. We anticipate these proposals not only harm migrant families, but will also increase the Home Office caseload and strain existing resources.
56. First, we anticipate an increase in fee waiver and change of conditions applications, from migrants who will be pushed into poverty or unable to cover hefty visa fees. Second, we anticipate an increase in applications under Appendix Private Life, from migrants (such as children and young people) who will have spent much or all of their

⁴⁰ <https://www.nao.org.uk/wp-content/uploads/2025/03/Immigration-Skilled-Worker-visas.pdf>

⁴¹ <https://www.ippr.org/articles/a-punishing-process>

⁴² <https://www.gingerbread.org.uk/our-work/single-parents-facts-and-figures/>

lives in the UK, but will be unable to qualify under the main pathway to settlement (due to fees, or the parents' own inability to meet ILR criteria).

57. In turn, the resource demand will have wider implications on the legal sector. More applications will lead to greater pressure on an already strained advice sector.
58. Refusals, which will be inevitable in any system, will result in increased work loads of the courts/tribunal. The Immigration and Asylum Chamber tribunals already have significant backlogs and are struggling to process cases.⁴³ Equally, Home Office data shows that the number of open Human Rights or other complex immigration cases stood at 76,433 in Q3 2025, higher than at any point since records started in Q3 2019.⁴⁴ The existing systems will not be able to cope with the resulting and overwhelming caseload.

Fiscal costs of migrants falling into irregular status

59. During an oral evidence session for this enquiry, Professor Gareth Davies argued that there exists a flawed notion that those unable to obtain ILR on a longer route will go back to their countries of origin.⁴⁵ We agree with his assessment.
60. Making ILR more difficult to obtain does not necessarily mean that people will leave the UK - many people, such as the care workers the Work Rights Centre has been supporting, will have spent their lives' savings for a UK work opportunity. Migrants may also remain, but continue to live in precarious conditions of irregularity, where they risk labour exploitation, eviction, and social exclusion. There is a real risk of harm to individual migrants and their families.
61. There is also a fiscal cost of irregularity that affects UK public finances more generally - including from lost income tax revenue, and from an increase in councils' expenditure on supporting families on the NRPF condition. When migrant families are excluded from public funds, councils generally step in, in compliance with their statutory duties (such as under section 17 of the Children Act 1989).

Human costs of penalising recipients of public funds

62. Migrants can only claim public funds in a limited set of circumstances: where access is desperately needed and by making a complex change of conditions application to the Home Office.⁴⁶ The application is subject to a high evidential threshold and must be made on the basis of a limited set of reasons (e.g. where there is a risk to the welfare of a child; or for Skilled Workers, where there are "particularly compelling circumstances which justify giving access to public funds").

⁴³ <https://freemovement.org.uk/first-tier-tribunal-appeal-receipts-up-123-in-a-year-amid-continuing-concerns-about-home-office-decision-making/>

⁴⁴ <https://assets.publishing.service.gov.uk/media/6924844290a8c154e902628d/immigration-and-protection-data-jul-sep-2025.xlsx>

⁴⁵ <https://committees.parliament.uk/oralevidence/16928/html/>

⁴⁶ https://assets.publishing.service.gov.uk/media/6942798436f089d38be1f1cc/Permitting_access_to_public_funds.pdf

63. Under the government's proposals: the qualifying period will be extended by 5 years for applicants who had received public funds for less than 12 months on the route to settlement, and by 10 years where they had received public funds for more than 12 months. This extraordinarily punitive measure makes little sense.

64. Quarterly migration transparency data published by the Home Office indicates that between Q1 2023 and Q3 2025, a total of 9,541 applications were submitted, corresponding to an average of just 867 applications per quarter.⁴⁷ Grants were even lower - the average application acceptance rate between Q2 2024 and Q1 2025 was just 55%. While the number of people who are given access to public funds is very small, these decisions save significant costs from local authorities.

65. Removing the NRPF condition could result in a net gain of £872 million over ten years.⁴⁸ A social cost benefit analysis from the London School of Economics found much of this gain comes from lifting children out of poverty, which has significant implications for their future prospects. In addition, there are added benefits of: enabling access to better-quality housing (with associated savings for the NHS), access to childcare (improving employment outcomes), and relief from problem debt (which has profound implications on productivity).

66. Additionally, change of conditions applications are disproportionately likely to be submitted by women. Women already made up 62% of applicants in the first three quarters of 2025.⁴⁹ Therefore, penalising recipients of public funds is likely to have a stronger, negative impact on female migrants, who are generally more likely to be single parents and unpaid carers.

67. In our frontline experience, migrants on the Skilled Worker visa have only been granted public funds after severe exploitation and retaliation by their visa sponsor. One key example is cases of modern slavery, where the sponsor not only pressured migrants to work in precarious conditions, but also made them homeless. Both we⁵⁰ and others, such as the Public Accounts Committee,⁵¹ have argued that exploitation on this route was enabled by insufficient structural safeguards and the government's slow response to the issue.

68. It is therefore unconscionable for the government to penalise migrant families for decisions made by Home Office officials - and to dissuade migrant families from making change of conditions applications in the future. Punishing exploited workers who need to claim public funds following exploitation would be particularly unjust, given the failings of government immigration policy in safeguarding them (see our reports)⁵².

⁴⁷ <https://www.gov.uk/government/statistical-data-sets/migration-transparency-data>

⁴⁸ <https://www.lse.ac.uk/news/latest-news-from-lse/c-mar-22/economic-and-social-gains-of-ending-nrpf>

⁴⁹ <https://assets.publishing.service.gov.uk/media/6924844290a8c154e902628d/immigration-and-protection-data-jul-sep-2025.xlsx>

⁵⁰ <https://www.workrightscentre.org/publications/2023/the-systemic-drivers-of-migrant-worker-exploitation-in-the-uk/>

⁵¹ <https://publications.parliament.uk/pa/cm5901/cmselect/cmpubacc/819/report.html>

⁵² <https://www.workrightscentre.org/media/uvrdwteg/report-published-24042025-safeguarding-sponsored-workers.pdf>

Limiting access to public funds for migrants with ILR.

69. Another proposal is for the NRPF condition to apply even upon receiving ILR. This stark departure from the present rules could cause real harm to migrant families.
70. In absolute terms, limiting access to public funds for migrants with ILR would minimally impact the public coffers. Data gathered by the Department of Work and Pensions in June 2025 confirmed that of the 7.9 million people on Universal Credit in June 2025, the vast majority of claims (83.6%) were made up of British nationals, Irish nationals and people with right of abode in the UK that do not need an immigration status to claim Universal Credit.⁵³ Only 2.7% of people on Universal Credit were in the Indefinite Leave to Remain (ILR) category, and 32% of these were already in employment. Notably, while the proportion of claimants with ILR has increased slightly (by 0.5pp) since June 2024, this increase is slower than that of the British, Irish and right of abode category (1.1pp).
71. By contrast, instituting more stringent welfare policies for migrants may have significant, unintended negative effects. Following a 40% cut in welfare transfers for refugees in Denmark in 2002, households' disposable incomes were reduced, and this had profound implications for their integration outcomes.⁵⁴ This figure included increased adult crime and reduced education attainment among children in school at the time of the reform. At the same time, any employment gains were largely short-term and concentrated in areas of high labour demand.

iv. Failure to Publish an Impact Assessment

72. The government has failed to publish an Impact Assessment or an Equality Impact Assessment (EIA) alongside the consultation period. The consultation document merely states these assessments will be published "in due course".
73. This omission undermines the validity of the consultation process.
74. Respondents are effectively asked to evaluate a radical set of policy proposals with limited and, at times, erroneous information (such as on the number of care workers, or the rate of vacancies in the care sector). Crucially, without an impact assessment it is not clear if the government's intentions are aligned with other strategic priorities - including to spur growth, achieve higher housebuilding targets, prevent child poverty and tackle Violence Against Women and Girls.
75. Changing the goalposts by placing settlement further out of reach can lead to poverty for the most vulnerable households, who face years of exclusion from public funds, and significantly increase the risk of labour exploitation. The vast amount of evidence on labour exploitation highlights the further risk that delaying access to ILR hinders migrants' social and economic integration.

⁵³ <https://www.gov.uk/government/statistics/universal-credit-statistics-29-april-2013-to-12-june-2025/universal-credit-statistics-29-april-2013-to-12-june-2025>

⁵⁴ <https://cepr.org/voxeu/columns/intended-and-unintended-consequences-welfare-cuts-refugees>

Increased risk of exploitation

76. While an assessment has not been published (or possibly conducted), our understanding is there are real risks of harm and exploitation which will be exacerbated by these proposals.

77. The relationship between sponsorship and exploitation has been robustly evidenced, including in reports by the Work Rights Centre⁵⁵ and other third sector organisations (Citizens Advice⁵⁶, the Modern Slavery Policy and Evidence Centre⁵⁷, Unseen⁵⁸), Unison,⁵⁹ media reports (including by the Bureau of Investigative Journalism,⁶⁰ BBC,⁶¹ the Guardian,⁶² and the Financial Times⁶³), parliamentary committees, and the National Audit Office.

78. In its July 2025 report,⁶⁴ the Public Accounts Committee drew an explicit connection between the sponsorship system and migrant workers' exploitation in the UK, noting not only that the Skilled Worker route "makes migrant workers vulnerable to exploitation", but also that the Home Office had failed to protect workers in this system - including by failing to safeguard workers affected by sponsor licence revocations (particularly in the care sector), and by adopting an unconvincing approach to preventing modern slavery more generally. Similarly, on 17 March 2025, the NAO report⁶⁵ on the Home Office's management of the SW route found that much of the Home Office's decision-making was made with poor understanding of how the route operates. It was also slow to address non-compliance on the route and had limited data on the scale of exploitation.

79. We are very concerned that by tying migrant workers to employers for years, the government is creating an exploitable, immobile workforce. While the Home Office has increased sponsor due diligence and compliance activities and immigration policy has restricted the types of roles that can be sponsored – *the design* of the system remains unchanged. Employers continue to hold the power to have workers' visas curtailed, and workers continue to face the risk that reporting unscrupulous employers will lead to them losing their status in the UK.

⁵⁵ <https://www.workrightscentre.org/publications/2023/the-systemic-drivers-of-migrant-worker-exploitation-in-the-uk/>

⁵⁶ <https://www.citizensadvice.org.uk/policy/publications/spotlight-report-no-1-how-work-visa-design-is-driving-exploitation/>

⁵⁷ <https://www.modernslaverypec.org/resources/uk-agriculture-care-visas-vulnerability-exploitation>

⁵⁸ https://www.unseenuk.org/wp-content/uploads/2025/09/Unseen_Hospitality-report_.pdf

⁵⁹

<https://www.unison.org.uk/news/press-release/2025/02/migrant-care-staff-having-to-share-beds-sleep-rough-and-charged-thousands-in-illegal-fees/>

⁶⁰ <https://www.thebureauinvestigates.com/stories/2024-03-11/visa-system-forces-care-workers-to-stay-silent-on-rape-and-abuse/>

⁶¹ <https://www.bbc.co.uk/news/articles/c1en4dx7yn9o>

⁶² <https://www.theguardian.com/world/2025/mar/16/flawed-uk-visa-scheme-led-to-horrific-care-worker-abuse-says-watchdog>

⁶³ <https://www.ft.com/content/24077686-e60a-443e-9674-30f601452d6b>

⁶⁴ <https://committees.parliament.uk/publications/48634/documents/254879/default/>

⁶⁵ <https://www.nao.org.uk/reports/immigration-skilled-worker-visas/?nab=0>

- 80. The government's settlement changes do nothing to address those risks - on the contrary, they extend them for years.
- 81. The Home Office's larger failure to assess the risk of exploitation resulting from these changes is worrisome. This singular point must be immediately assessed and published.

Costs of possible litigation

- 82. Aside from the human and moral costs, there is a glaring risk of increased litigation costs stemming from the proposed changes.
- 83. The changes would disproportionately and negatively impact individuals with protected characteristics under the Equality Act 2010, leading to further litigation. Zoe Bantleman, Legal Director of the Immigration Law Practitioners' Association (ILPA), warned that the proposed changes create "perversities" in the system, including creating different entitlements for family members of British nationals (who would face a 5 year wait), and family members of non-British residents settled in the UK (who would face longer waits).⁶⁶ The result would over-burden an already over-loaded system, creating further delays and consuming already limited resources.
- 84. Many protected characteristics would be at risk of increased harm. The mandatory requirement to have earned a minimum salary for 3-5 years before applying for ILR may also disadvantage people with disabilities. The harsher proposals for a 15 year baseline for care workers is almost certain to disadvantage women, who make up the majority of the workforce.
- 85. Without a full equalities impact assessment, the current formulation of the proposals carries a significant risk of litigation, with associated costs for the government.

Impact on businesses

- 86. Finally, it is deeply worrying how the government has not published an impact assessment of how these changes will impact businesses and the economy.
- 87. Extending the qualifying period for ILR would mean businesses incur additional long-term staffing costs for every Skilled Worker they hire. Currently, businesses are required to pay an Immigration Skills Charge (of £480/year/worker for small and charitable employers, and £1,320/year/worker for large employers). Delaying settlement would require employers to keep paying the IS Charge for years.
- 88. The retroactive nature of the changes may also damage business' trust in the predictability of government policy. The potential impacts could be felt on recruitment and investment. These immigration changes are being introduced in a climate of serious policy uncertainty, higher than in all but one Parliament in the last 30 years.⁶⁷

⁶⁶ <https://committees.parliament.uk/oralevidence/16844/pdf/>

⁶⁷ <https://www.resolutionfoundation.org/comment/to-everything-turn-turn-turn/>

89. Any impacts are likely to be felt more acutely in industries with significant shares of hard-to-fill vacancies, where businesses cannot easily recruit domestically. They are also more apparent for transnational companies, where countries with less restrictive immigration regimes (see Appendix 1) would be seen as alternative or preferential destinations by workers. This risks putting entire industries at a competitive disadvantage, with potential repercussions for sector-wide labour shortages, as well as regional and national economies. The impact of these policies could ripple onwards for years, as migrants settle in other 'more desirable' nations with more welcoming immigration policies.

v. Broader View: UK-wide Public Attitudes and Impact

90. The proposals seem to stem from a perception of public attitudes. But the public's attitudes towards migration are complex.

91. On the surface, when asked for views on immigration as a whole, a sizable share of public attitudes survey responses express negative views. For a significant share of the population, immigration will always appear too high - regardless of the actual numbers of migrants coming to the UK, their contribution to the UK, or indeed the policy changes adopted by successive governments.

92. But basing settlement policy decisions on topline survey data alone would be a dangerous oversimplification.

93. Firstly, there are serious limitations to public attitudes surveys on migration as a whole. The public perception of migration is markedly different from the reality of migration, and we know that immigration as a topic evokes different reactions from different respondents. Secondly, asked for their views on specific groups of migrants, rather than immigration as a whole, the public's views are significantly more nuanced, and more welcoming, with studies showing non-negative attitudes towards most forms of work migration.

94. We are concerned that the government's settlement proposals are narrowly responding to these topline polling figures, ignoring these nuances and limitations.

95. For the avoidance of doubt, we are not suggesting that a different, more granular, interpretation of public attitudes would justify the government's punitive settlement proposals. We reject the settlement proposals for the numerous negative impacts they will have. Our aim with this response is simply to show that the government's proposals *also* fail to address public concerns - and in the case of migrant workers, go contrary to what the public desire.

Broad attitudes to migration

96. On the surface, public attitudes to migration are generally skeptical.

97. Polling by YouGov from 4-5 January 2026 found that 23% of respondents thought tackling immigration should be the government's biggest priority, even more than those

who thought cost of living should be the top priority (16%) and those who prioritised the economy (10%).⁶⁸ Tackling immigration was particularly significant for Reform voters (56% of whom made it their number one priority) and Conservative voters (37%), and was the second most important issue for Labour voters (14%), with Liberal Democrats (9%) ranking it as their fourth priority. Polling by Ipsos yields similar findings, with immigration chosen as the most important issue by 21% of respondents, albeit lower than the cost of living (29%).⁶⁹

98. This sentiment appears to be driven at least partly by discontent with perceived levels of immigration. The latest surveying by British Future finds that 57% of Britons would like to see immigration reduced, with the share of those wanting it to be reduced by a lot growing from 25% in January 2022 to 41% in November 2025.⁷⁰ Not dissimilarly, Ipsos polling from April 2025 found that 67% of Britons believe immigration levels were too high,⁷¹ and YouGov polling from 5 January 2026 found that 70% of Britons find immigration to be too high in the last 10 years.⁷²
99. The public also appears to have limited confidence in the Labour Party's handling of asylum and immigration. Separate polling by YouGov has found that as of 12 January 2026 fewer than 10% of respondents believed Labour would be best at this, less than half the share when Labour was elected in July 2024 (26%).⁷³ Similarly, the latest polling by More in Common finds that 74% of Britons have little or no confidence in Labour's ability to manage these matters.⁷⁴
100. This immigration debate is at least notionally intertwined with social cohesion. Research by More in Common finds that in December 2025, 47% of Britons believed that society is at least somewhat divided between immigrants and non-immigrants, with the figures relatively high irrespective of voting intention.⁷⁵ The same study finds that 64% of Britons believe the country is somewhat or very divided, the highest figure since polling started.
101. In many ways, the government's settlement proposals speak directly to these topline concerns. In her opening statement, the Home Secretary presents the proposals as a means of tackling high levels of migration, building community cohesion, and asserting more government control of migration.

⁶⁸ <https://yougov.co.uk/politics/articles/53815-what-do-the-public-say-the-governments-number-one-priority-for-2026-should-be>

⁶⁹ <https://www.ipsos.com/en-uk/britons-pessimistic-about-government-performance-short-and-long-term-survey-reveals>

⁷⁰ <https://www.britishfuture.org/wp-content/uploads/2025/11/Noise-and-nuance.Immigration-Attitudes-Tracker-report-2025.pdf>

⁷¹ <https://www.ipsos.com/en-uk/public-hostility-towards-immigration-understanding-contradictions>

⁷² <https://yougov.co.uk/topics/politics/trackers/do-brits-think-that-immigration-has-been-too-high-or-Low-in-the-last-10-years>. It is also worth noting that some of the public may express dissatisfaction due to immigration levels perceived as being too low. YouGov polling found that 4% of respondents believed immigration in the last 10 years was too low.

⁷³ <https://yougov.co.uk/topics/politics/trackers/which-political-party-would-be-the-best-at-handling-asylum-and-immigration>

⁷⁴ <https://www.theguardian.com/uk-news/2026/jan/10/two-thirds-of-uk-voters-wrongly-think-immigration-is-rising-poll-finds>

⁷⁵ <https://www.moreincommon.org.uk/latest-insights/the-state-of-social-cohesion-in-2026-2/>

102. But while this engages with one aspect of public opinion on migration as an issue (general, undefined, presented as a broad homogenous concept), it misses both the biases underlying survey results and the many nuances which shape public perceptions of migrants as people.

Biases and limitations in data related to attitudes to migration as a whole

103. Public opinion on immigration as a whole is easily biased by recent political and media discourse. For example, a report by British Future from November 2025 finds hardening political discourse on migration, and reliance on one-dimensional social media for news, are two key drivers of a hardening of opinion on migration - with increased shares of both strong proponents, and opponents, of immigration in the population.⁷⁶

104. Simply put, it could be that more people feel that migration is too high, because more public figures make the same argument.

105. But public perception of migration is also often far removed from the reality of migration.

106. Polling by More in Common found that despite net migration to the UK falling by more than two thirds in the year ending June 2025, 67% of respondents believed it had actually increased.⁷⁷ This is consistent with analysis by British Future, which found that when posed with net migration statistics demonstrating a reduction between 2023 and 2024, 21% of respondents refused to believe the figures.⁷⁸ YouGov polling goes further to suggest that as of December 2025, nearly half (43%) of surveyed Britons did not understand what 'net migration' means.⁷⁹ Finally, separate YouGov polling from November 2025 found that nearly one third (32%) of Britons erroneously believed that many more immigrants were in the UK illegally than legally, and just 19% thought many more were in the UK legally than illegally.⁸⁰

107. These errors underline a lack of understanding about immigration statistics. These proposals, as drafted, feed into this narrative with further errors and likely serve to cause further harm. Instead of curing public discontent, they may be widening a gap in public discourse. Further, beyond the widespread bias, public views are more complex and difficult to capture.

⁷⁶ <https://www.britishfuture.org/wp-content/uploads/2025/11/Noise-and-nuance.Immigration-Attitudes-Tracker-report-2025.pdf>

⁷⁷ <https://www.theguardian.com/uk-news/2026/jan/10/two-thirds-of-uk-voters-wrongly-think-immigration-is-rising-poll-finds>

⁷⁸ <https://www.britishfuture.org/wp-content/uploads/2025/11/Noise-and-nuance.Immigration-Attitudes-Tracker-report-2025.pdf>

⁷⁹ <https://yougov.co.uk/politics/articles/53641-do-britons-know-what-net-migration-means>

⁸⁰ <https://yougov.co.uk/politics/articles/53744-what-do-europeans-think-about-immigration>

Nuances in data related to migration in specific contexts

108. The public has more nuanced views of immigration and immigrants than topline figures suggest. A Migration Observatory study found that when people are asked questions about immigrations, respondents are most likely to think of asylum seekers (62%), and least likely to think of students (29%), even though students represent one of the largest group of immigrants coming to the UK, while asylum seekers are one of the smallest.⁸¹

109. Broad questions about migration policy might, in fact, be informed by much narrower views on particular types of migration. For example, More in Common polling found that 79% of respondents wanted the government to focus its immigration policy on small boat crossings, as opposed to 10% who selected restricting net legal migration overall.⁸²

110. Studies that prompt respondents to express views on particular groups of migrants, or think of migration in context, also reveal more nuanced attitudes. British Future found that a plurality of respondents wanted increased immigration for doctors (47%), nurses (47%) and care home workers (39%).⁸³ This chimes with YouGov polling which suggests Britons are willing to accept *greater* work migration into healthcare, if it ensures the sector is fully staffed.⁸⁴

111. Similar findings applied for other occupations. For instance, British Future highlighted that at least 50% of respondents wanted increased or constant immigration into practically all roles covered, excluding bankers but including construction labourers, engineers, and restaurant and catering staff.⁸⁵ Notably, some of these roles are below graduate level, and are not considered 'high-skilled' under the RQF framework. YouGov polling also found that Britons overwhelmingly do not think negatively of work migrants filling in skills gaps, or coming to work as skilled tradespeople.⁸⁶ In fact, the survey finds that Britons want to prioritise "getting enough workers in areas with skills shortages", as opposed to restricting immigration as a whole.

112. Ultimately, there is still a public desire for greater immigration and these proposals would undercut that will.

UK wide impact / harms from the proposed changes

113. The proposed changes pose potential harms to devolved nations.

⁸¹ [https://migrationobservatory.ox.ac.uk/resources/reports/thinking-behind-the-numbers-understanding-public-opinion-on-immigration-in-britain/#:~:text=Perceptions%20of%20Migrants%3A,think%20of%20students%20\(29%25\).](https://migrationobservatory.ox.ac.uk/resources/reports/thinking-behind-the-numbers-understanding-public-opinion-on-immigration-in-britain/#:~:text=Perceptions%20of%20Migrants%3A,think%20of%20students%20(29%25).)

⁸² <https://www.theguardian.com/uk-news/2026/jan/10/two-thirds-of-uk-voters-wrongly-think-immigration-is-rising-poll-finds>

⁸³ <https://www.britishfuture.org/wp-content/uploads/2025/11/Noise-and-nuance.Immigration-Attitudes-Tracker-report-2025.pdf>

⁸⁴ <https://yougov.co.uk/politics/articles/53744-what-do-europeans-think-about-immigration>

⁸⁵ <https://www.britishfuture.org/wp-content/uploads/2025/11/Noise-and-nuance.Immigration-Attitudes-Tracker-report-2025.pdf>

⁸⁶ <https://yougov.co.uk/politics/articles/53744-what-do-europeans-think-about-immigration>

114. The risks and harms detailed above apply across the United Kingdom. One example is the impact of the NRPF condition in increasing public costs. The NRPF Network reports that “in the financial year 2024–25, 91 councils in England, Scotland and Wales collectively spent £94 million” on supporting NRPF households.⁸⁷ Similarly, the risks posed to vulnerable groups are not held within regional borders.

115. But there are additional and specific regional harms. For example, there may be unintended negative consequences for regional markets reliant on Skilled Workers. As well, Northern Ireland would offer lower family reunification rights to more than a quarter of the population.

116. First, devolved nations have different labour markets to England.

117. The National Institute of Economic and Social Research (NIESR) notes that the working populations are more rural,⁸⁸ which in turn is driven by the prevalence of key primary (e.g. agriculture) and secondary (e.g. manufacturing) industries. NIESR also highlights that jobs in devolved nations are more likely to be lower-skilled, with just over half of Northern Irish (55%) and Welsh (58%) jobs being in Standard Occupational Codes 1-3 or 5, as opposed to 71% of jobs in London.

118. Therefore, it is possible that these regions were disproportionately reliant on middle-skilled labour available via the Skilled Worker route. We are not aware of any recent, formal assessment on this subject.

119. We do know that between October 2024 and March 2025, more than one in eight (13%) Skilled Worker visas (not including Health and Care Worker visas) were used to fill vacancies in devolved nations.⁸⁹ At least some of these roles were in critical primary and secondary industries, with examples being Scottish fishing⁹⁰ and farming,⁹¹ which are crucial to local and Scottish economies.^{92,93}

120. The Scottish Government’s proposals, sent to the UK Government for consideration in the development of the immigration white paper, also note the negative impact of reduced work migration on the sustainability of Scottish industry and communities and call for tailored migration policy in this context.⁹⁴ Extending the route to settlement for medium-skilled workers in such industries may risk having a disproportionate impact on

⁸⁷ <https://www.nrpfnetwork.org.uk/information-and-resources/policy/reducing-pressures-on-councils>

⁸⁸ <https://niesr.ac.uk/news/how-are-uks-devolved-nations-faring-ahead-general-election>

⁸⁹ https://assets.publishing.service.gov.uk/media/6937e67eb612700b2cb73679/Spring_2025_Immigration_Rules_Impact_Assessment__Skilled_Worker_and_Care_Worker___003_.pdf

⁹⁰ <https://www.gov.uk/government/news/new-immigration-rules-provide-boost-for-scottish-fishing-industry>

⁹¹ <https://www.theguardian.com/business/2025/oct/05/scottish-farmers-skilled-workers-visas-philippines>

⁹² <https://www.nfus.org.uk/farming-facts.aspx>

⁹³ <https://www.gov.scot/publications/scotlands-marine-economic-statistics-2023/>

⁹⁴ <https://www.gov.scot/binaries/content/documents/govscot/publications/correspondence/2025/07/uk-immigration-white-paper-2025-scottish-government-proposals/documents/uk-immigration-white-paper-2025-scottish-government-proposals/uk-immigration-white-paper-2025-scottish-government-proposals/govscot%3Adocument/uk-immigration-white-paper-2025-scottish-government-proposals.pdf>

Scotland and other devolved nations, by increasing the likelihood that workers must leave the UK before becoming eligible for ILR.

121. Devolved nations - in particular Wales and Northern Ireland - also have substantially lower incomes than the Greater South East and East of England regions.^{95,96} The findings stand when using average gross disposable household income (GDHI).⁹⁷ In the context of the proposed changes, this means that households in Wales and Northern Ireland on extended routes to ILR are more likely to struggle paying the fees associated with repeated extension of permission to remain.

122. Workers on the Skilled Worker route will also be less able to meet the £50,270pa salary threshold required for a five-year reduction to the ILR qualifying period, putting them at a significant disadvantage relative to their counterparts in the southern regions of England. Occupational analysis of Skilled Workers' salaries by region is yet to be conducted by the Home Office, despite having linked individual records to those held by HMRC.

123. Under the proposals, family members of Irish and other non-British nationals will be subject to a baseline qualifying period for ILR of 10 years, whereas family members of British nationals will be on a 5-year route. The discriminatory nature of this proposal will be felt particularly acutely in Northern Ireland, where more than one quarter of the population holds an Irish, but not a British passport.⁹⁸

124. Finally, there may be significant cross-border movement of Irish nationals into Northern Ireland, owing to the Common Travel Area. Irish households of mixed nationality may feel discriminated against, with (i) lesser family reunification rights than their British counterparts and (ii) lower household cross-border mobility, as ILR under Appendix FM of the Immigration Rules has residence requirements attached.

Conclusion

125. The settlement proposals pose significant risks to migrant communities. They also pose a risk to the economy. In addition, they do not reflect the public's actual views and wishes on immigration.

126. The settlement proposals place care workers and other middle-skilled workers on the Skilled Worker route onto an extended, 15-year track to settlement, even though the public welcome work migration in all roles, high and low skilled.

127. The proposals reward the highest earners, and penalise those in lower-paid roles, even though the public broadly welcomes migration that fills skills gaps. It should be added that British Future found bankers to be the only selected profession where less than half of respondents wanted to increase or retain or increase levels of immigration.

⁹⁵ <https://commonslibrary.parliament.uk/research-briefings/cbp-8456/>

⁹⁶ <https://www.nisra.gov.uk/statistics/work-pay-and-benefits/annual-survey-hours-and-earnings>

⁹⁷ <https://www.ons.gov.uk/economy/regionallaccounts/grossdisposablehouseholdincome/datasets/regionalgrossdisposablehouseholdincomegdoi>

⁹⁸ https://build.nisra.gov.uk/en/custom/viewdata?d=PEOPLE&v=PASSPORTS_HELD_18

In fact, respondents aligning with Reform UK overwhelmingly (52%) expressed a desire to reduce immigration for bankers, a figure much higher than for care home workers (37%), engineers (29%) or nurses (27%).⁹⁹

128. We are extremely concerned that by increasing the baseline and introducing more stringent criteria for settlement, the government's proposals could create a class of people permanently locked in temporary status.
129. The risk is critical: thousands of people may be excluded from public funds for decades, tied to employers with little bargaining power, less able to move jobs, less able to make long-term plans or investments in the UK - on the whole, less able to integrate and to contribute to British society at their full potential.
130. Another extraordinary implication of the government's proposal is that even after 14 years of living and working lawfully in the UK, a migrant care worker who loses her job (for instance, as a result of sex discrimination, redundancy, or illness), would face the prospect of becoming a visa overstayer. This is not a hypothetical scenario. It is a real risk that could affect hundreds of thousands of migrant workers employed in medium-skilled roles, for whom the Home Secretary proposes a 15 year baseline route.
131. The very notion of decades-long temporary status runs counter to the government's stated policy objectives of promoting integration. It is also likely to disadvantage migrants in lower-paid roles, women, the sick and disabled, refugees, and all those whom the government penalises with its new 'time-adjusted' settlement model.
132. In terms of broader integration, the policy change will create a class of long-term temporary residents who are effectively excluded from the democratic process, by not having the opportunity to naturalise and gain the right to vote in elections. This cohort would potentially include more than one million individuals nationwide, with certain regions and local authorities having significant shares of the resident population being unrepresented in policymaking.
133. Under the guise of rewarding contribution and ending the "automatic" right to settlement, the government is effectively paving the way for further social division. An impact assessment of these proposals is crucial, and until then we will oppose and resist their implementation.

⁹⁹ <https://www.britishfuture.org/wp-content/uploads/2025/11/Noise-and-nuance.Immigration-Attitudes-Tracker-report-2025.pdf>

APPENDIX I: International Context

Comparative Analysis of the Proposals with the UK, Europe and Commonwealth countries

134. We analyse the qualifying periods of residence in the UK and other countries. In this respect, permanent residence policy has been broadly comparable between the UK and other countries in Western Europe and the Commonwealth.

135. Should the proposed changes be introduced, the UK would have one of the longest routes to permanent residence. It would put the UK in line with outlier countries, like Jordan, Turkey, Denmark, Japan and Switzerland. We note that Danish and Swiss policy exists in a radically different immigration context, due to EEA citizens' free movement rights.

136. Information from the Migrant Integration Policy Index (MIPEX) suggests that most Western European and Commonwealth states have residency requirements for settlement that are no longer than five-years.¹⁰⁰

137. Table 1 summarises the residence requirements for permanent immigration status for selected countries, based on information from MIPEX and government pages on family and work migration routes. Standard family and work migration routes are considered. Information for the UK is based on current immigration rules.

¹⁰⁰ <https://www.mipex.eu/permanent-residence>

Table 1. Number of years' residence required to apply for permanent immigration status or citizenship

Country	Family route	Work route
United Kingdom, 2025	Normally, 5 years under Appendix FM.	5 years under the Skilled Worker route.
Australia, 2025	2 years from the date of application for a temporary residence permit. ¹⁰¹	2 years' full-time employment for subclass 457, 482 or eligible bridging visas subject to nomination by employer. ¹⁰² Up to 3 years for subclass 189 and 190 visas and subject to 'nomination' by the relevant authority. ¹⁰³
Canada, 2025	Permanent residency for qualifying family members upon successful application for permission to remain or enter Canada. ¹⁰⁴	Eligibility is determined by meeting a range of requirements and, in some cases, nomination by an employer or relevant authority. For the selective Express Entry work migration programmes, permanent status is granted upon processing of application (normally within 7 months). ¹⁰⁵ For work migration under the non-Express Entry Provincial Nominee Program (PNP), permanent status is granted upon processing of application (normally within 13 months). ¹⁰⁶ Separate rules exist for the Province of Quebec.
Germany	3 years' residence for spouses and dependent children of German nationals and permanent residents. ¹⁰⁷	Between 21 months (for EU Blue Card holders) and 5 years (standard route to permanent status). ¹⁰⁸
Ireland	Normally, 3 years' residence for family members of Irish nationals, but 5 years' residence in other cases. ^{109,110}	5 years' continuous residence "as the holder of an employment permit issued by Department of Enterprise, Trade and Employment." ¹¹¹

¹⁰¹ <https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-listing/partner-offshore/migrant-100#Eligibility>

¹⁰² <https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-listing/employer-nomination-scheme-186/temporary-residence-transition-stream>

¹⁰³ <https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-listing/skilled-nominated-190#Eligibility>

¹⁰⁴ <https://www.canada.ca/en/immigration-refugees-citizenship/services/immigrate-canada/family-sponsorship.html>

¹⁰⁵ <https://www.canada.ca/en/immigration-refugees-citizenship/services/immigrate-canada/express-entry.html>

¹⁰⁶ <https://www.canada.ca/en/immigration-refugees-citizenship/services/immigrate-canada/provincial-nominees.html>

¹⁰⁷ <https://www.germany-visa.org/family-reunion-visa/>

¹⁰⁸ <https://www.germany-visa.org/immigration/permanent/#can-i-work-in-other-eu-countries-with-my-german-permanent-residence-permit>

¹⁰⁹ <https://www.irishimmigration.ie/how-to-become-a-citizen/become-an-irish-citizen-by-naturalisation/>

¹¹⁰ <https://ie.iasservices.org.uk/how-can-i-get-permanent-residency-in-ireland/#:~:text=If%20your%20spouse%2Ffamily%20member,Stamp%204%20long%20term%20residency>

¹¹¹ <https://www.irishimmigration.ie/my-situation-has-changed-since-i-arrived-in-ireland/long-term-residency/>