

Earned Settlement

Joint Briefing for the Minister for Migration

Dear Jo White MP, Parliamentary Under-Secretary of State and Minister for Migration and Citizenship, Home Office

We are a coalition of organisations providing support, advocacy and immigration advice to migrant communities across the UK. Drawing on the lived experience, frontline casework and published research, we are concerned that the proposed earned settlement reforms may undermine key Government objectives on economic growth, workforce stability, child poverty reduction, integration and social cohesion.

These reforms will fundamentally reshape the route to settlement for over 2 million people already living and working in the UK, as well as for future arrivals. For those already here, many could have to wait 15 years for settlement; some would have no realistic route at all.

Key points of concern

- o The consultation closed in February 2026 with more than 200,000 responses. No Government response, detailed policy or impact assessment has yet been published.
- o The reforms risk deepening child poverty and family insecurity, producing unequal outcomes by nationality, gender and region
- o Produce disproportionate impacts on women, disabled people, carers, survivors of abuse and some ethnic minority communities.
- o Undermine recruitment and retention in key sectors including health and social care
- o Increase complexity and administrative burdens for the Home Office and local authorities.
- o Changes are likely to be made through the Immigration Rules, leaving limited room for parliamentary scrutiny.

We believe settlement should remain achievable within five years and be recognised as a positive outcome of integration for people building their lives in the UK. The Government should also actively encourage citizenship as a policy goal.

If the Government proceeds, we ask the Minister at a minimum to:

1. Ensure no changes apply retrospectively to people already living and working in the UK.
2. Reject a continuing No Recourse to Public Funds condition on those granted settlement.

3. Publish all economic, equality, operational and child impact assessments before final decisions, and allow full parliamentary scrutiny before implementation.
4. Reduce settlement application fees to the cost of processing.
5. Drop the proposals to penalise benefit use, overstaying, and irregular entry.
6. Retain the existing private life rules for children and young people born or growing up in the UK.
7. Design any model to account for the lower earnings of women, part-time workers, disabled people, carers and those in ill health, with robust safeguards for children and vulnerable groups, including survivors of abuse.

Context: The Government's aims and the evidence gap

We recognise the Government's stated aims: that settlement should be linked to contribution, that indefinite leave should be earned rather than automatic, and that rapid growth in eligibility could add pressure on public services and finances.

Our concern is whether the proposals would achieve those aims in practice. The fiscal case rests on settlement giving access to public funds and social housing. Analysis [reported in the media](#) suggests the claimed £10 billion in savings is flawed, and the methodology has not been published.

The Government has [confirmed](#) that economic and equality impact assessments will follow in due course. It has not confirmed whether it will publish a child impact assessment, despite [its commitment](#) to a Child Rights Impact Assessment. Publishing the full evidence now would allow stakeholders to test it and help the Government avoid costly unintended consequences.

Key risks for the Government

1. Children, poverty and family security

This is the area of greatest risk to the Government's child poverty commitments. [Research by Praxis](#) using government data estimates that delayed access to public funds could leave up to 90,000 children in prolonged poverty by 2029.

- Families would pay visa fees for far longer, diverting money from children's needs. Existing long routes are [linked](#) to housing insecurity and homelessness.
- Partners of British citizens who do not meet the new [earnings requirement](#) may never settle. Partners of settled residents would wait at least ten years.
- Children born or raised here would spend much of their childhood on temporary status. A banker's child earning over £125,140 could be on a three-year route; a care worker's child on a 15-year route, with effects on [family stability and mental health](#), belonging and education.

2. Unequal impacts and equalities duties

An earnings-based definition of contribution risks reproducing labour market inequalities, with implications for the Public Sector Equality Duty.

- IPPR [found](#) the longest routes would fall disproportionately on people from Africa and South Asia, warning of echoes of Windrush. Four of the five most affected nationalities (India, Nigeria, Pakistan, Zimbabwe, the Philippines) are [former British colonies](#)
- [Women](#) are less likely to meet income thresholds, an effect [most pronounced](#) for Black, Asian and minority ethnic women.
- Survivors of domestic abuse may have gaps in work or breaches caused by coercive control. Victims of [trafficking and modern slavery](#) face similar barriers, and delay raises the risk of re-trafficking.
- Disabled people, carers and those in ill health would struggle under any income-centred model, even with exemptions.

3. Growth, workforce and regional balance

The reforms could undermine NHS and social care staffing and the Government's growth mission.

- In a 2025 [Royal College of Nursing survey](#) of over 5,000 migrant nursing staff, 60% without settled status said longer routes would very likely affect their decision to stay. [Care sector surveys](#) show similar results.
- Employers and unions warn the UK would become less attractive than competitors with shorter, cheaper routes, putting sponsors' investment in recruitment and training at risk ([evidence](#)).
- Because [earnings](#) are higher in London and the South East, settlement would be harder to reach elsewhere, sitting uneasily with growth and devolution objectives.

4. Deliverability and cost

The proposed system would be markedly more complex for the Home Office to run. Decisions could require assessing earnings histories, benefit use, caring responsibilities and exemptions over many years, with data-sharing across departments.

- Processing is already [delayed](#) on some routes and added complexity would increase pressure on capacity.
- More people struggling to secure status is [likely to increase](#) demand on local authorities.

- We ask that an operational assessment sets out how the system would be run and what resources it would need.

Reported options: what they would and would not resolve

We welcome reports that the Government is considering amendments. Ending retrospective application would be the most significant single step, but none of the options alone resolves the core risks.

Reported option	What it would resolve	What it leaves unresolved
Ending retrospective application	Protects people who made major life decisions under the current rules, building on the commitment to British National (Overseas) visa holders. A very positive step.	Impacts of longer routes on future migrants, employers, public services and communities.
Exempting care workers	Reduces immediate social care workforce risk; consistent with the Prime Minister's social care ambitions and Fair Pay Agreements. Welcome.	Retrospectivity, child poverty, unequal impacts, other shortage sectors, lower-paid skilled workers, people on 10-year routes, family migrants and their children.
Settlement with No Recourse to Public Funds	Mainly benefits higher-paid migrants unlikely to need state support.	Creates a two-tier permanent status. Does not meet the fiscal aim, as access to public funds is only delayed by a year until naturalisation.

Next steps we ask of the Minister

As a coalition, we would be glad to provide further case studies or data to support the Department's work, and we would very much welcome a meeting to discuss all of these points raised.

Before any Statement of Changes to the Immigration Rules is laid, we ask the Minister to:

1. Publish the consultation response alongside the economic, equality, operational and child impact assessments, including the fiscal methodology behind the £10 billion savings estimate.
2. Confirm that changes will not apply retrospectively to anyone already in the UK.

3. Make an oral statement to Parliament and allow time for debate before implementation.
4. Meet our coalition, with officials, to discuss the evidence from our casework and the safeguards needed for children, survivors of abuse and trafficking, and other vulnerable groups.

Should you or your team require any further information in relation to this joint briefing please do not hesitate to contact Matteo Besana at matteo@reunitefamiliesuk.co.uk

List of organisations endorsing this briefing:



