



Request for Continued Funding for EU Settlement Scheme Support

December 2025

The Civil Society EUSS Alliance

Convened by Seraphus, the Civil Society EUSS Alliance (the Alliance) unites organisations with deep knowledge of the EU Settlement Scheme (EUSS) and its impacts on vulnerable people and communities. The group includes grassroots and national organisations; advisers, solicitors and legal experts; and policy and campaigning groups across the UK, including grant funded organisations, those funded by independent trusts and foundations, and local government.

In surveys to the Alliance beginning July 2023, an average of two thirds of respondents in each survey employ dedicated staff to provide EUSS support and advice.

This request for continued funding comprises discussions, feedback and shared insights from members of the Alliance in all parts of the UK, including grant funded organisations.

Request for Continued Funding for EU Settlement Scheme Support

Request for Continued Funding for EUSS Support

We urge the Home Office to maintain and enhance targeted funding for EUSS assistance to organisations working with vulnerable communities across the UK.

Future funding models should prioritise meeting the increasing complexity of need and resulting casework across the UK, rather than basing allocations on Immigration Advice Authority (IAA) accreditation.

Without funding in the future many thousands of vulnerable EU citizens face the risk of losing their lawful status, which could also place significant pressure on public services.

Funding to Grant Funded Organisations (GFOs)

2019: £22m supporting 70+ organisations UK-wide.

2025: £1m supporting just 4 IAA1 organisations and 5 IAA2+ providers UK-wide.

It is weighted towards IAA1 support, despite evidenced need for IAA2+ advisors.

Current funding does not cover operational costs, and is short term (1 year contract).

Current funding contract ends end of March 2026.

Current Context

- **Funding reductions:** Despite annual cuts in funding, demand remains high, as the complexity of cases and casework increases.
- Since '23 respondents from the Alliance to surveys have described funding as a 'real concern' resulting in an **EUSS sector that is not stable, inadequately or insecurely funded**.
- In the last year, some organisations in the Alliance have reported **the proposed closure of their EUSS provision due to lack of funding**, or unsuccessful applications for funding to the Home Office and independent funders.
- The conclusion of the current funding cycle **coincides with the introduction of significant new processes** under the Scheme, making ongoing support essential.
- Evidence from Home Office statistics: **clearly reflect the level and complexity of need**, which has been consistently raised by GFOs and the sector.
- **Urgent support needs:** Individuals are seeking support and advice during urgent situations, often with complex histories, needs and issues.
- **Longer term needs for vulnerable cohorts:** including **children and people with pre-settled status** will continue to require legal advice and support in the future to secure their rights and entitlements in the UK.
- **Need for specialist intervention:** The evolving policy landscape and evidential requirements increasingly necessitate specialised legal assistance of IAA2+ to the most vulnerable.
- Further reductions or closure of existing provision will lead to the increase in '**advice deserts**' and has already resulted in areas of the UK where appropriately accredited advice provision is not available to vulnerable people with complex need or issues.
- **Loss of expertise:** The defunding of grant-funded organisations will result in a significant loss of expertise regarding the EUSS. This expertise enables individuals to ensure their rights under the Withdrawal Agreement.
- The sector provides **assistance and feedback to the Home Office** concerning policy changes, information-gathering and sensitisation amongst vulnerable people across the UK.

Insights from the sector

Systemic Risks of Inadequate and Unsustainable Funding

“Funding is an investment in the betterment of people's lives that is incalculable, it improves physical and mental health, social interaction and lessens stress. The lack of funding, coupled with the Home Office's very onerous EUSS application process and evidential requirements, means that it is incredibly difficult for applicants to apply on their own. Most applications are now complex.”

Andrew Jordan, Settled, IAA3, operating across the UK, but grant funded to work in Wales at IAA1

“As a consequence of the phasing out of Home Office funding and other financial pressures on local authority and civil society actors (e.g. Citizens Advice), there are growing support gaps when it comes to assisting Roma at a community level (e.g. to make simple applications/ upgrades and use their status) and providing higher level legal support for more complex EUSS cases. These gaps will grow wider as GFO funding is removed.”

Report: The Migration Status & Exclusion of Roma EU Citizens in the UK, Roma Support Group and the University of Sheffield

“The Home Office is reliant on the goodwill of many organisations who continue to deal with complex cases despite there being no or limited funding for the work we do.”

Matthew Evans, The Aire Centre, IAA3 (previously a GFO)

“Funding is inadequate, but has been for a long time, and it has been aimed more broadly at IAA1 when it should be focused on IAA2 at this point. It needs to be stepped up and focused if there is truly a desire to support the most vulnerable applicants in securing status under EUSS and avoiding another Windrush scenario.”

Caseworker, IAA3, working for an organisation that is not a GFO, operating in England, Scotland and Northern Ireland

“We have...managed to get many clients from pre-settled to settled status [despite difficulties in proving continuous residence]. This is a win win situation for the Home Office and the applicant. Our clinics are full every single week and we can clearly see that this support must continue.”

Admir Dema, Migrant Help, a GFO operating across England, IAA1

“Our resources don't reflect the importance of the role we play in Scotland. We need funding, but based on the success rate of our funding applications, funders don't seem to be interested in supporting migrant related work, and funding available is short term and limited. So who is going to help the vulnerable people we currently support?”

Noelia Martinez, Citizens Rights Project, operating in Scotland, IAA1

Recommendations from the Sector

- Through funding, **recognise the role of GFOs in supporting the Home Office to engage vulnerable people in the Scheme**, ensuring their rights in the UK under the Withdrawal Agreement are protected.
- Ensure engagement with the sector and key stakeholders, including the EU Delegation to the UK and the IMA, to ensure a **system-wide focus and understanding of vulnerable people engaging with the Scheme**.
- **Guarantee, and target, an increase in grant funding** to reflect the scale of need, and to ensure sustainable provision across all nations that is free at the point of delivery.
- **Shift funding priorities** away from an organisation's IAA accreditation, aligning resources with case complexity and casework required.
- **Enhance the design of funding contracts and the associated communication** to the sector to ensure that grant funding can be used to maintain service provision in the immediate term and sustain it over the long term.
- **Strengthen Home Office engagement with GFOs** (and the wider sector) at policy/ministerial level, not solely through operational teams.
- Through funding, **recognise the key role GFOs play** within the wider sector, and the impact of inadequate resourcing.
- Through funding, recognise the essential role of GFOs in enabling other services (**NHS, welfare, housing**) to function effectively.
- **Conduct impact assessments** and consult on future changes to funding before decisions are made.

Overview

Demand for advice and support for the EU Settlement Scheme (EUSS) remains high, and has not reduced since the launch of the Scheme in 2019.

Case complexity has increased significantly as vulnerable people with complex needs engage with the Scheme, requiring accredited, specialist support to secure or maintain lawful status.

Many applicants have **complex needs and issues**: they lack evidence, digital literacy, English language skills, or understanding of the process.

The sector reports **referrals are increasing** for EUSS advice from NHS, local authorities, social workers, and other third sector organisations in the sector which lack expertise and accreditation.

Appropriately **accredited EUSS provision across the UK is scarce, and at capacity.**

2025 to end of Q1 2026: **just £1m funding** to 4 IAA1 organisations and 5 IAA2+ providers across the whole of the UK, despite the level of demand and need as evidenced in Home Office data.

Statistics from the Home Office released in 2025:

- **Applications average 30,000 per month**, including late and repeat applications and joining family member applications.
- **Over 111,000 applicants are awaiting decisions from the Home Office**, and **nearly 5,000 waiting for decisions on administrative reviews and nearly 17,000 waiting on an appeal to be heard**. Once decisions are made, legal assistance likely to be required.
- As of Sept '25, **1.47 million people hold pre-settled status**, requiring advice to navigate extensions, upgrades to settled status, or falling out of scope.

<https://the3million.org.uk/eu-settlement-scheme-statistics>

Groups seeking support from GFOs include:

- | | | |
|---|---------------------------------------|------------------------------------|
| • trafficking and modern slavery | • Roma and other minority communities | • Digitally excluded individuals |
| • People with poor physical/mental health | • Individuals with previous refusals | • People with low literacy/English |
| • Homeless and destitute people | • Individuals with complex histories | • Survivors of domestic violence |

These groups cannot navigate the system without dedicated, accredited (IAA2+) legal support, and are recommended to do so.

Insights from the sector

Human Impact of EUSS Barriers

“A disproportionate number of Roma were granted pre-settled rather than settled status, which means that many now need to upgrade their status to settled. According to our 2024 survey of Roma, 84% had needed help to apply initially and over 60% did not understand that those with pre-settled needed to upgrade to settled status. Upgrading was something that many were struggling to navigate between 2022 and 2024 given the need to actively apply again to upgrade...There is therefore a risk that some such individuals will have their status curtailed (and potentially be unaware of this until they need to prove their status).”

Report: The Migration Status & Exclusion of Roma EU Citizens in the UK, Roma Support Group and the University of Sheffield

“An elderly lady in London who had a stroke was referred to us... after 6 months of intensive work with the Home Office and social services we managed to get her settled status. Without specialist advice this would have never have been managed.”

Admir Dema, Migrant Help, a GFO operating across England, IAA1

“I worked on a case recently of a vulnerable Roma mother who has submitted 7 applications previously, which had all failed. She was increasingly concerned that she would get into trouble because she didn't have a status. She is also aware of enforcement raids in her area, and her partner is on immigration bail. It took from August to November to build her case, locate enough relevant evidence and engage the Vulnerability Team. She was finally granted settled status in early December.”

Oleg Danuta, IAA1, Migrant Centre NI, Northern Ireland

“We have been working with a non EU family member. Her spouse is in jail, waiting to hear if he will be extradited and she is unable to return to either her husband's, or her own home country. She has struggled to engage in the process due to her vulnerability, health issues, and her fears of losing her status. She has been dependent on her spouse for her immigration status and income and is now dealing with a host of issues: risk of homelessness, no access to welfare and benefits, and significant mental and physical health issues as a result. We have worked with her for nearly a year and worked with a number of other services and support in housing, welfare benefits, mental health support, food banks etc. But this is not an unusual case for us.

Noelia Martinez, Citizens Rights Project, operating in Scotland, IAA1

Pressures on GFOs and the wider sector

Caseworkers are at **full capacity** due to the complex **needs of clients** and **complexity of cases** at this stage in the EUSS.

GFOs, and others, are increasingly operating **waiting lists, reduced services and referring vulnerable people on to other providers.**

Some organisations have reported that due to lack of funding they will **no longer offer dedicated EUSS support and advice to vulnerable people.**

Due to capacity organisations are **unable, or limit, outreach and engagement activities** that ensure people are aware of the need to apply, and of their rights.

Current funding does not cover on-going costs for accredited provision and the demands of casework.

Organisations **lack sustainable funding sources**, subsidising Home Office contracts from independent funders.

EUSS remains **ineligible for Legal Aid**, leaving no alternative provision for the most vulnerable without Exceptional Case Funding applications to Legal Aid.

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Insights from the sector

Frontline Capacity and Resource Constraints

"In 2019 we had a team of around 13 staff and currently we are five... we are over-stretched. Due to the funding cut in April 2025 we lost two advisers. The sector is so busy that we can easily keep busy another 10 advisers. Our dedicated EUSS team is doing its best to deal with so many referrals, but the demand is so high that it's difficult to deal with everything that comes our way. We have spoken to partner organizations and they have confirmed that they would be powerless without our specialist support. If there was no further support after 2026 then these cases will just keep doubling, and these vulnerable communities will be the ones who will suffer the most and pay a hefty price."

Admir Dema, Migrant Help, operating across England, IAA1

"[As an IAA3 caseworker] I work on approx. 12 cases at one time, have personally supported over 300 people over the past year, but our organisation has directly supported in excess of 1000, and tens of thousands indirectly through social media and sensitisation activities. I am working over capacity, and this means I am unable to take on 15-20% of enquiries that come in."

Andrew Jordan, IAA3, works for Settled which operates across the UK, but is grant funded to work in Wales at IAA1

"I work on 50-60 cases in a month, mostly vulnerable Roma clients. Normally I'm working on about 6 late applications for children and adults, perhaps 20 pre-settled to settled status applications, then support for people to update their details, generate share codes, resolve technical issues."

Oleg Danuta, IAA1, Migrant Centre NI, Northern Ireland

"We have directly supported over 450 people over the last year, and 1200 people indirectly. We work on about 20-30 cases at one time, this amount of casework is the same as last year - retained rights, late applications, refusals. Despite losing our Home Office funding in early 2025 we have continued to do EUSS casework, funded independently, we are now operating at capacity, and have to turn away about 30% of enquiries, referring on to GFOs and law firms."

Matthew Evans, The Aire Centre, IAA3 (previously a GFO)

"Our casework involves engaging with other services and advisers on welfare benefits, housing, mental health support, social services, other immigration advisers. Our clients require our support for different issues and over many, many months, sometimes years. The existing funding for our EUSS service only covers for 1 year and although we are IAA1 accredited, it only covers for EUSS related work. It is hard to find funding to broaden our immigration services"

Noelia Martinez, Citizens Rights Project, operating in Scotland, IAA1



Independent Monitoring Authority
For the Citizens' Rights Agreements

IMA
3rd Floor Civic Centre
Oystermouth Road
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SA1 3SN

Name

Lydia Martin
lmartin@seraphus.co.uk

1 December 2025

Dear Lydia,

EUSS applications and support

Thank you for engaging with us on the critical issue of future support for UK residents who remain eligible for the EU Settlement Scheme (EUSS) but have yet to secure their status. This includes late applicants, joining family members, and those who need to manually upgrade from pre-settled to settled status.

At the IMA we have seen the consequences of citizens being unable to obtain residency status and, without the ability to prove lawful residence, eligible individuals protected by the withdrawal agreements may risk losing access to essential rights and services.

The IMA recognises these challenges often surface at pivotal life moments. For example, when applying for further education, seeking employment, accessing healthcare, obtaining a driving licence, or travelling abroad. We also recognise that, for some, the reality and consequences only emerge and become critical when citizens are needing to exert and access their rights.

The IMA has continued to focus on ensuring citizens are encouraged to apply for EUSS status and recognise that sometimes this will mean a late application. We also recognise that once citizens have applied, they can face delays in having their application concluded.

It is widely understood that there can be a multitude of reasons why an individual's application can then be delayed. Our recent survey and operational activities have highlighted that many applicants require extra support because of their unique situation, challenges, and a lack of confidence in using public services or completing digital applications.

The IMA recognises and appreciates the support provided GFO's and support agencies in assisting citizens with their applications. We recognise the importance of citizens being assisted in making applications to the EUSS and securing an outcome. Both the IMA and IAA have raised concerns about the importance of



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citizens having access to accredited legal advice to ensure they get the right advice and are supported in their applications, as this could be one of the underlying reasons for some delays and higher refusal rates.

Data also shows a significant number of repeat applications, including individuals converting to settled status and those reapplying after refusals. The current refusal rate stands at roughly 9%, although this may not indicate ineligibility; rather, it could reflect the challenges some individuals face in meeting evidentiary standards when submitting their application.

As time passes since the EUSS deadline, it is expected that first-time applicants and those who were previously refused will continue to present with increasingly complex cases, a concern that is regularly brought to our attention by the sector and from those who provide support.

The IMA continues to recognise the importance of eligible citizens receiving support and guidance to secure and exercise their rights, so they are able to live, grow and thrive in the UK.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'H. Geach', is written over a light blue circular stamp.

Helena Geach

Deputy Director, Operational Stakeholder Engagement