

Model NRPF support framework for LAs

Councils supporting people with no recourse to public funds (NRPF) should have a comprehensive understanding of their statutory duties, a clear and transparent strategy to meet those duties, and a plan to improve outcomes for people with NRPF who access services across the council. Councils looking to achieve Council of Sanctuary recognition should be aiming to provide support beyond this statutory requirement and this document aims to set out some examples of best practice to provide guidance on how services can be structured to provide the best outcome for local residents with NRPF and the wider community.

Statutory Social Care Duties

Social care departments have statutory duties to support families and adults with care and support needs. In addition to meeting statutory minimum requirements councils should have a clear strategy for how those duties are being met.

Key Commitments

To deliver high quality support to local residents, councils should:

- Develop a proactive approach to reaching vulnerable migrant communities and tackle gatekeeping
- Have a clear strategy of how their support is delivered to adults and families with NRPF across social care and housing services
- Promote the welfare of adults and families in their care, beyond meeting their assessed care and support needs
- Apply the principles of flexibility, humanity and person-centred service delivery
- Develop a clear plan for improving access to services for people with NRPF
- Have a plan for improving and retaining specialist NRPF expertise
- Keep accurate data to ascertain the true level of need

Embedding good practice throughout the council

- Council officers must have a clear understanding about [how a person's immigration status can affect their access to council services](#), which [services are universal, and how to assist those who do not qualify for mainstream support](#).
- Ensure there is a joined-up ending migrant destitution strategy, covering policy and provision across children's social care, adult social care and housing, particularly in two-tier local authorities where social care sits in upper tiers, yet housing functions in lower tier authorities
- Councils must recognise the importance of early intervention and prevention, such as Early Help services, in promoting independence and averting the need for future social care provision - whilst ensuring that cases are not 'stepped down'. [NRPF services should consider how they are promoting early intervention and prevention amongst migrant communities in their area](#).

- Council-wide strategies, such as those for tackling e.g. [homelessness](#), [access to food](#) and [domestic abuse](#), must consider those with NRPF, and how their exclusion from mainstream support can be equitably addressed. Where the council offers universal provision (e.g. services to those who are homeless or threatened by homelessness; Essentials/hardship grant; employability support which is not linked to UC etc, it needs to actively promote it to people with NRPF, both through voluntary partners and as part of a designated website).
- Community and voluntary organisations have always played a key role in supporting, caring and advocating for people with no recourse to public funds. To promote the best experience for people with NRPF in their area, councils should look to build capacity in the local voluntary and community sector, seeking opportunities to improve existing services and open up opportunities for people with NRPF including through funding opportunities or inclusion in strategic planning and review of services.

Service user journey and key pledges/principles

Councils looking to implement best practice in supporting persons with NRPF can take inspiration from the principles and examples below:

Principle 1. Awareness of services

The council will disseminate information about the services it provides to those with NRPF in a clear and transparent manner and will take steps to ensure this information is available to relevant communities and stakeholders.

What might this entail?

- Provide information on council websites about support available, referral processes, what firewalls are in place (when information may be shared between different departments) and how to access immigration advice and VCS support.
- Making sure information is available in different languages and in an easy to access format (translated printed resources and/or website, Easyread etc.).
- A single point of contact or 'hub' approach should be considered to improve access and limit replication and improve coordination work/sharing good practice with other local authorities. This single point of contact should have support from senior leaders to ensure improved practice is developed across departments beyond a single lead.
- Providing information in public spaces such as libraries, GP surgeries, schools, foodbanks, children's centres or other relevant hubs, drawing on the insight of those who are accessing NRPF services in informing how information may be best disseminated.
- Working with local VCS organisations to disseminate information on how to access support, consider forming a local NRPF partnership.
- Engage with people with lived experience to understand how to best share information.

Examples of good practice:

- [Islington Borough Council](#)
- Southwark council's SPOC
- [Manchester City Council](#)
- Bristol Council's NRPF network

Principle 2. Referral routes

The council will ensure a welcoming environment for those with NRPF seeking support, will ensure referral pathways are clearly advertised and will reduce frontline gatekeeping aimed at dissuading people from accessing support.

What might this entail?

- Referral routes for social services assessments under the Care Act and Children Act (or relevant legislation in Devolved Nations) must be clear and open to all - there needs to be easy access points with a variety of referral options (webform, email, phone); including the possibility of presenting in-person to an accessible location (e.g. Southwark and Islington), including information on how to access support outside of normal working hours.
- The Council could consider training all council staff in your approach to NRPF and how best to support people who approach different parts of the service, ideally involving all employed by the council from security guards and receptionists (often first point of contact) to directors of services. The NRPF Network offers an "Introduction to support options for people with NRPF" training.
- There could also be a special focus on [training social workers in understanding the wider context of NRPF](#) and the challenges facing some of those who approach the council for support, awareness of barriers to disclosure etc. which may need to be circumnavigated in order to identify the information needed to be able to assist people in need (e.g. lack of documentation, lack of firewall with other departments, social prejudices and structural racism to name a few).
- Councils need to consider creating firewalls to other departments and to publicly and transparently set out what information will be shared, when and under what circumstances, with the aim of lowering the threshold for migrants with an irregular immigration status to approach the local authority for advice and early intervention. This is likely to become [increasingly important if the provisions of the Illegal Migration Act come into force](#).

Examples of good practice:

- A practical guide for social workers on best practice can be found here - [No Recourse to public funds - A toolkit for Social Workers](#). Including the voices of people with lived experience of accessing NRPF services in review processes to identify barriers.
- Chapter 3 of the [NRPF Network Adults Practice Guidance](#) and chapter 2 of the [Children and Families Practice Guidance](#) describe the considerations local authorities should have when considering referrals
- [Southwark Council](#) referral page, duty number is also available in signatures of key council officers
- [Lambeth Council](#)

Principle 3: Up-to-date expertise

Local Authorities should have a plan for improving and retaining specialist staff who have the expertise to understand the complexities of NRPF cases.

What might this entail?

- Consider setting up or expanding NRPF provision through a dedicated NRPF team or staff member as a focal point of expertise and for referral from other agencies.
- Empower middle managers as well as frontline practitioners to enact their duties assessing and supporting vulnerable people with NRPF, and to adopt best interest approaches which prioritise the needs and welfare of families and individuals with NRPF over immigration status.
- See the NRPF Network website for an [overview of the rights and entitlements for people with NRPF](#) and ensure that staff members across the council are aware of this resource.
- Elected members should upskill themselves on the issues facing destitute migrant people and proactively lead on this area of work, drawing on good practice from the [Migrant Champions Network](#) and the [City of Sanctuary Local Authority Network](#).
- Local authorities should support the development and attend regional forums to share expertise and information including advice on NRPF entitlements, local authority duties, legal updates, and good practice.

Examples of good practice:

- NRPF Network [training](#)
- Wandsworth and Richmond NRPF link worker

Principle 4. Assessing need

The council recognises the impact of being subject to immigration restrictions on the assessment process and is committed to carrying out thorough assessments to identify and address a broad range of needs.

What might this entail?

- Social workers should refer to [NRPF Network guidance for families](#) and [adults with care and support needs](#) respectively to understand their duties under social care legislation and best practice for social care support for people with no recourse to public funds.
- In England and Northern Ireland, there is no statutory guidance on how to assess and provide support. [Scotland](#) and [Wales](#) have developed their own guidance (note: it is not statutory guidance) for local authorities. Welsh Government guidance recommends that local authorities have "a presumption in favour of providing interim support to prevent destitution" while an assessment is being carried out. It is our view that all UK local authorities should adopt this higher standard of practice.
- Assessment should be respectful and trauma informed (for both adults and children)
- Section 17 assessments must refer to and follow the Department for Education's statutory guidance, [Working together to safeguard children](#). The council should avoid the use of 'pre-screening destitution tests' to identify if families meet the 'destitution criteria' before carrying out a full child in need assessment as such tests may result in families who are eligible for support being wrongly refused assistance. Councils should ensure that the assessment process [centres the voice of children and that they are working in children's best interests](#) to safeguard and promote wellbeing.

Examples of good practice:

Practical help for councils to [understand different models for providing independent legal advice](#) and demonstrating how cost effective this is in the long run. E.g. Haringey commissions an immigration adviser (OISC accredited legal advice); and the community organisation Praxis is directly funded by 4 local authorities and funded by London Councils and GLA to deliver services pan-London and at a sub-regional level.

Principle 5. Equity in support

The council recognises the importance of ensuring the wellbeing and safety of all local residents regardless of their immigration status; and strives to ensure equity in service delivery between services delivered to those with NRPF and those with recourse to public funds.

What might this entail?

- Within a local authority or two-tier authorities, there must exist a clear understanding of which service areas are responsible for meeting the needs of someone with NRPF in the area. Depending on how a council's services are structured, this may take the form of written protocols for meeting care and support needs between:
 - Children's Social Care
 - Adult Social Care
 - Mental health services (for section 117 support)
 - Local health services for hospital discharge
 - Housing
- This could range from ensuring the council has a plan for how to deal with single homeless persons with NRPF, to a commitment to ensuring Housing First for all. Social workers should refer to [NRPF Network guidance for families](#) and [adults with care and support needs](#) to understand the impact of being subject to immigration restrictions when assessing accommodation and financial support, and other support to meet the needs of the child/adult
- **Subsistence:** The council should have a published, transparent, up-to-date subsistence rate policy for social services support under section 17 of the Children's Act or the Care Act. The subsistence rate policy needs to ensure that the rate for the supported person is set following a thorough needs assessment which engages with a broad range of needs with the aim of ensuring the safeguarding and wellbeing of children or vulnerable adult - which for most will mean financial support in excess of the set legal minimum equivalence of statutory asylum support and closer to mainstream support. You can see the [NRPF Network's article on setting subsistence rates](#) or chapters 5 and 5.3 of their [guidance for families](#) and [adults with care and support needs](#)
- **Accommodation:** Councils should have internal plans for acquiring suitable accommodation for adults and families with NRPF, sometimes at short notice, with minimal use of hotels and BnBs. The council should ensure all accommodation is of an acceptable standard and have pathways for addressing complaints and maintenance issues in all accommodation, should avoid housing people in unlicensed HMOs and ensure families are only housed in accommodation with shared facilities or without cooking facilities for very short periods of time. Councils should explore [different accommodation models for non-UK nationals with restricted](#)

[eligibility](#) and should set a homelessness strategy which specifically assesses local homelessness and housing needs related to immigration status, including people affected by NRPF (and refugees leaving asylum support accommodation), and set out a plan for how to support this population.

- LAs should work in partnership with local housing associations, migrant/refugee organisations and homelessness charities to find accommodation solutions for people with NRPF:
 - LAs should broker [relationships between housing associations and refugee/migrant organisations](#).
 - LAs should spot-purchase time-limited bed spaces provided by charities or housing associations alongside immigration advice / legal support.
 - LAs should identify unused areas of land / meanwhile premises that could be used for modular housing (e.g. Malachi Place in Redbridge).
 - Hosting: LAs should support hosting projects for people with NRPF, for example by not removing the single persons council tax discount when a single person is hosting someone rent-free.
- *Broader welfare benefits*: Councils should help persons with NRPF explore and apply for funds and schemes they are entitled to. In addition, the local authority should explore the access to wider welfare benefits (not listed public funds) that persons with NRPF cannot access and seek to provide equivalent support and/or seek to ameliorate the impact of such exclusions. Examples of this would be providing free school meals to all eligible children regardless of immigration status, supporting families around extended child care hours for 3-4 years olds, providing alternative support equal to Healthy start maternity support and grant, support around palliative care etc.
- *Immigration advice*: Councils should also ensure that legal advice is available to persons with NRPF seeking support with the aim to enable people to regularise their status and access mainstream support. Local authorities need better working relationships with specialist organisations and immigration advice providers. There is [strong evidence](#) that when councils fund immigration fees to help the people regularise their status and access mainstream benefits, this improves conditions for families and saves money for the council in the long run (e.g. Coventry, Lewisham, Southwark, Lambeth, Manchester, Southampton). There are various forms of legal support provision including commissioned services, in house provision, provision via the SMP, target group based and ad hoc provision, but increasingly LAs are stepping into the space to alleviate legal-advice deserts.

Examples of good practice:

- LAs provide accommodation to people with NRPF / restricted eligibility, e.g. [examples from Greater Manchester and Haringey](#).
- Islington Council refers young people in receipt of section 17 support to 'young catalyst grant' which has been set up to ensure that unrestricted funding can be used to fund things like laptops and school trips for those with NRPF who may be excluded from accessing such support under other statutory schemes.
- Local authorities should set eligibility criteria for discretionary funds broadly and creatively (e.g. Household Support Fund) so that it does not exclude people with NRPF.

- Some local authorities have successfully adjusted their section 17 subsistence rate to reflect mainstream policies - see for example Islington, Kensington and Chelsea and others - in recognition that there is no reason to propose the needs of children affected by their parents immigration status are any different than other children. This may all sound like a lot of expenditure at a time when local authority finances are stretched thin. But data shows that these children are not going anywhere, and investing in proper support during these vital childhood years is investing to save - and investing in sustainable and cohesive local communities.
- Lewisham Council funds a full-time immigration solicitor at Southwark Law Centre
- Coventry City Council funds the Central England Law Centre and some other advice organisations for a range of areas of law.
- Scotland's [Ending Destitution Together](#) (EDT) strategy includes training and guidance for councils on migrants' entitlements as well as the provision of immigration advice for vulnerable migrants.
- Richmond and Wandsworth council's Revenue and Benefits team are conducting a piece of work on universal funding pots which can be used to support people with NRPF

Principle 6. Case resolution

The Council will ensure that there is a strategy in place for exiting NRPF support, typically through an immigration-related resolution, and works to ensure that this transition involves as little disruption to support as possible.

What might this entail?

- Individualised plans for a route off of NRPF support.
- A service-wide plan for case resolution and escalation.
- A strategy to provide legal services to people on NRPF support.
- Councils could use NRPF Connect to escalate cases and expedite case resolution for people on social services support.
- Councils must be aware of the discretionary powers available to them to support people with non-eligible care and support needs, with a view to using those powers to achieve the authority's humanitarian aims.
- For persons transitioning between NRPF support mainstream welfare/housing there is a helpful [outline of some common issues and suggestions for improvements to the process](#) to guide councils.
- [Put in place measures in children's social services to prevent children in care / care leavers ending up with NRPF](#) – including undocumented children or former UASC.

Examples of good practice:

- Merton Council is a good example of partnering with a LA on early intervention and resolving immigration issues before a child turns 18.
- [NRPF Connect](#)

Principle 7. Data collection

The council should develop a mechanism by which data on those with NRPF status who come in contact with the council can be recorded to demonstrate the significant role council play in alleviating homelessness and destitution for families, adults with care needs, and care leavers with NRPF. Councils should ensure data sharing with government departments is kept to the legal minimums.

What might this entail?

- Local authorities should systematically collect data relating to support sought by people with NRPF with the aim of evidencing the financial and human costs of immigration and asylum decisions.
- Gathering data and evolving information on those with NRPF supported by the council, including their immigration status at point of entry, whilst supported and when leaving council support.
- Utilising '[NRPF Connect](#)' to ensure information is comparable between different councils and regions.
- Councils should track the cost and nature of the social services support they provide to people with NRPF. This enables services to be properly planned and for councils to contribute to regional and national discussions around NRPF services.
- Councils should also monitor the number of people approaching them for the support and the number of assessments conducted, as well as who is ultimately supported and the cost to the LA. This would help identify disparities and general trends in need.
- Data should be properly protected and shared anonymously.
- Council webpages should include statements as to how data will be used to reassure people with NRPF and improve access to support.

Examples of good practice:

- [NRPF Network guidance on NRPF Connect](#)

Principle 8. Including the voices of residents with NRPF

The council will work to find creative and lasting ways of including the voices of people with experience of NRPF in the strategic planning and ongoing review of services.

What might this entail?

It is vital that the voices of this structurally disadvantaged group are proactively sought and included. It is important that the council acknowledges and takes steps to address the inherent power imbalance in this relationship, that the voices of all groups (including children) are sought, that people are properly compensated for their time and contributions. The voices of people with experience of NRPF should also be included in the training of council staff and social workers - this can be through the council's own mechanisms or commissioned from external parties.

Examples of good practice:

- London Borough of Barking and Dagenham are in the process of writing up a comprehensive case study of their experience of going through such a review process.
- Lambeth - inclusion of people with lived experience of NRPF on the Board and meaningful compensation for their time.
- Wandsworth is also aiming to include people with NRPF on their partnership forum
- Islington Council hold a regular NRPF service users forum

Principle 9. Advocating for lasting change

The Council will use evidence gathered through its service provision to make a public stance in opposition of policies that deliberately cause destitution for their residents, including arguing for an end to the NRPF, on the basis of the evidence of the harm it causes to individuals and communities, as well as the costs to local authorities.

What might this entail?:

- Ensure systematic data gathering (Principle 6 above) to be able to demonstrate harm to individuals and community and cost to council.
- Join in partnerships in order to amplify voices calling for change through e.g. through strategic migration partnerships, LGA, GLA etc

Examples of good practice:

- [NRPF Network recommendations for change](#)
- APPG on Migration and APPG on poverty - Joint report on the [Effects of UK Immigration, Asylum and Refugee Policy on Poverty](#) - including a statement in opposition of policies that deliberately create destitution for migrants.