

## Written evidence from **Hackney Migrant Centre, Joint Council for the Welfare of Immigrants (CPN0011)**

### About JCWI

JCWI was founded in 1967 to ensure that the rule of law and human rights were respected in the immigration system. We are one of the UK's leading immigration charity covering all aspects of immigration, asylum, and nationality law.

We provide specialist legal advice in immigration and asylum matters and carry out research, examine and analyse immigration policy and law. We use the knowledge gained from the experiences of our clients navigating the asylum and immigration systems to inform our advocacy, identify trends and areas of concern and to make evidence-based recommendations for the improvement of our systems.

### About Hackney Migrant Centre

Hackney Migrant Centre (HMC) is a charity based in London that supports people experiencing destitution as a result of their immigration status. We support all migrants, regardless of immigration status, nationality or current place of residence. We provide free advice on immigration, welfare and health and a welcoming environment for everyone who attends our drop-in centre.

### Summary

No recourse to public funds (NRPF) is a visa condition which prevents most migrants from accessing the majority of state-funded benefits. The term 'public funds' covers most benefits, tax credits or housing assistance that are paid by the state. It does not include benefits that are based on National Insurance contributions, such as contribution-based jobseekers' allowance, statutory sick pay, or statutory maternity pay. The condition applies to all those on a visa who have not been granted Indefinite Leave to Remain – this includes people who intend to stay in the UK permanently or have been in the UK for many years but are on restrictive and long routes to settlement, which are set by the Home Office. As a result, a diverse group of people are affected by NRPF conditions, including migrant workers of all skill levels (employed and self-employed), migrants on family visas and international students. Asylum seekers are also not entitled to claim mainstream benefits and can only access specific financial support for people at different stages of asylum applications when destitute. Undocumented migrants have no right to access benefits. British family members of migrants are often impacted by restrictions too, as well as children born in the UK to parents without a permanent migration status.

In the experience of both JCWI and HMC, NRPF is more likely to impact migrants from already marginalised groups, among whom it compounds other structural factors that put people at risk of poverty. There is clear evidence that NRPF conditions increase the risk of poverty, destitution and homelessness among migrant families. NRPF is also an inefficient way of saving public money, as it forces people to rely on emergency support, often from Local Authorities, and significantly reduces their ability to build stable lives and savings that could see them through crises. This means they are more likely to need fee waivers, homelessness support and other services at times of crisis, as has been demonstrated during the COVID-19 pandemic. The pandemic has greatly exacerbated the suffering of these families, exposing the precarity in-which they are forced to live which limits their ability to weather crises, and put services supporting them under increased strain.

## Consultation Question Responses

### **1. *Approximately how many children in the UK live in households that have NRPF? What are the challenges involved in estimating this accurately?***

There is no official figure of the number of people with NRPF. However, recent [Home Office data](#) on people with valid leave to remain other than settlement indicates that approximately 1.3million people in the UK have NRPF as a condition of their leave. The Migration Observatory found that at the end of 2019, [at least 175,643](#) non-EEA citizens aged under-18 live in families who would be expected to have NRPF. Most children who are non-EEA citizens (and as of January 2021 also those who are EEA citizens) and who do not have permanent residency in the UK have visas with the NRPF condition attached. They estimate this breaks down to 44,623 children on student visas, 79,696 who moved to the UK as family members on their parents' work visa, 10,983 dependents joining or accompanying a family member and 15,323 children in the "other" visas category.

However, calculating this number accurately is difficult because the Government does not know how many undocumented migrants live in the UK, an additional cohort of people all of whom have NRPF, but usually neglected from estimated figures of people with NRPF. The number of undocumented children is unknown because there is no administrative data on either the number of non-EU citizens in the UK, the number of people with leave to remain, or the number of EU citizens and non-EU family members who failed to apply to the EU Settlement Scheme by the 31<sup>st</sup> June 2021. Further, estimations do not account for the fact that a small number of people apply to have their NRPF condition lifted.

### **2. *How many children in the UK are undocumented or have an insecure immigration status?***

It is, by definition, impossible for any research to provide an authoritative answer to this question (see above), but JCWI's report [We Are Here](#) - on the experiences of irregular migrants – seeks to provide greater clarity on the number of undocumented migrants living in the UK. The UK Government does not produce an estimate of the undocumented population and has not attempted to do so since 2005, when its estimate came to [430,000 people](#). There has since been no indication that it intends to produce an updated figure.

Recent estimates conducted by researchers suggest the undocumented population is between [800,000](#) and [1.2 million people](#). [The Pew Research Centre's](#) recent study found an almost even split between men and women, of all ages, originating from all regions of the world. Like the migrant population as a whole, [it is estimated](#) that undocumented migrants tend to be relatively slightly younger and more likely to be of working age than the general population, but also include elderly members, as well as significant numbers of children. Whatever the precise size, we know that there is a significant population of undocumented migrants living in the UK.

The [Greater London Authority \(GLA\) estimates](#) that just over a quarter (26%) of undocumented migrants in the UK, or 215,000 are children, half of-whom were born in the UK. A further 117,000 are estimated to be young people under the age of 24. People who are brought to the UK as children or who are born here can still be considered undocumented and therefore at risk of removal to countries they have never known. They are often not aware they are undocumented until years later when, for example, they apply to university or to receive student finance. Many of the migrants in JCWI's [We Are Here](#) research came to the UK as children. Two were born in the UK to migrant parents and have therefore never actually migrated. Almost half (46%) have dependent children of their own, many of whom are still undocumented like their parents. Many of these children were born in the UK. Numerous families have children with a mix of different statuses, as children are regularised when they have lived in the country after seven or ten years, or half their lives, and only when their parents can afford it and prove that they fulfil the criteria.

### **3. *What proportion of children with NRPF are living in poverty? How does this compare to children whose families do have access to public funds?***

There is no way of knowing exactly what proportion of children with NRPF are living in poverty because the Government does not gather this data. Despite this lack of monitoring, there is [clear evidence](#) that having NRPF increases the risks of poverty, destitution and homelessness. Before the onset of the COVID pandemic, families with NRPF were already facing an uphill battle in their daily life. These families cannot access the public safety net, even during a crisis, such as when fleeing domestic abuse, threatened with eviction or unemployment, or even during a global pandemic. [The Children's Society found](#) that NRPF and other immigration policies are leaving thousands of children growing up in long-term poverty, trapped in cycles of homelessness, destitution and mounting debt and segregated from their communities and peers. In September 2021, IPPR published a [damning report](#) which found that the current NRPF system is not fit for purpose and finding that the policy has put many individuals and families at a high risk of poverty and destitution. In addition, earlier this year, the [High Court ruled](#) that policy is driving families with children into destitution and breaches the government's legal duty to safeguard children's welfare.

Children and families on the ten-year route to settlement with NRPF disproportionately face financial difficulties and destitution. According to [research](#) from The Children's Society, this cohort are predominantly families from Black, Asian and ethnic minority backgrounds, many of whom are single parents, with British, UK-born or raised children, living on very low income for prolonged periods of time. Further, [The Unity Project](#) found that people with protected characteristics are worse affected by the NRPF than those without. It is important to note that many of HMC's clients on the ten-year route who were previously undocumented have reported that they didn't experience much difference or improvement after receiving leave to remain, where they are still subject to the NRPF condition. This suggests that even where migrants have the right to work and earn money, the NRPF condition can trap them in poverty, particularly following longer periods of irregularity.

This case study demonstrates how the NRPF condition can trap people (particularly women and children) in abusive situations, unable to access homelessness or refuge assistance if they leave so forced to choose between the risk of abuse or destitution. Insecure immigration status is [often used](#) as a tool of control by perpetrators to abuse their partners and threaten them. A [research report](#) by the Oxford Centre of Migration, Policy and Society found that when social services' support is provided to families with no recourse to public funds, domestic abuse is often a key feature in causing their situation of homelessness.

#### **Case Study – Ms J**

Ms J is the mother of young two children. She came to JCWI in November 2019 with limited leave to remain as a parent on the 10-year route. She had NRPF. She was the victim of domestic violence perpetrated by her children's father. Ms J was subject to various forms of abuse, including: physical violence, financial control, separation from family members, threats, verbal abuse and controlling behaviour. The relationship had broken down due to the domestic violence in July 2019. After the breakdown of their relationship, Ms J had no choice but to stay in the property with her abusive ex-partner. She was not earning enough to afford rent and was unable to work full-time as she was the sole carer for her children. As Ms J has No Recourse to Public Funds, she was reliant on her abusive ex-partner to pass her the Child Benefit monies.

Ms J and her children were evicted from their home in October 2019 and became homeless. Ms J's Independent Domestic Violence Advisor was unable to find a refuge to support Ms J and her family because of her NRPF status. The family stayed with a friend for a week in cramped accommodation in which Ms J slept on a mat on the floor. Ms J and her children were then accommodated by the Local Authority under Section 17.

JCWI made an urgent Change of Conditions application for Ms J which was granted. There was

some delay in receiving her BRP (around 3 weeks).

#### **4. *What impact has the pandemic had on children with NRPF? Has the lifting of restrictions made any difference?***

Long before the pandemic, NRPF restrictions have been pushing families into abject poverty, forcing them into unsustainable debt and into homelessness or unsafe, overcrowded, insecure housing. Since the Covid-19 outbreak, this situation has considerably worsened. The pandemic had and continues to have huge negative impact on families across the UK, but for those with NRPF the consequences have been devastating. As hundreds of thousands of people lost their jobs and faced the long-term prospect of little or no income, the importance of access to the public safety net has never been clearer. [DWP figures](#) showed that nearly a million successful applications for Universal Credit were made in the last two weeks of March 2020.

This vital support was not accessible to thousands of children and families with NRPF, even during such an unprecedented crisis. [Recent research from IPPR](#) has highlighted how migrants are at particular risk of the economic fallout of COVID. This disproportionate risk is illustrated in the fact that 17% of migrant workers across the UK are self-employed, compared to 14% of UK-born workers, 54% of migrants rent their property, compared to just 29% of the UK-born population, and migrant workers are more likely to work in accommodation and food services.

JCWI's [research into migrants with NRPF](#) experiences of COVID found that migrants subject to NRPF were just as likely as those who are entitled to access benefits to have lost their job during the pandemic, but will not have had the means to support themselves when they did. It further found that migrants with NRPF were significantly less likely to report that they could safely self-isolate in their homes. Migrants with NRPF conditions attached to their visas are at high risk of being pushed into destitution should they lose their jobs and have no access to the support network provided by public funds. Without access to the public safety net migrants are forced to continue to work even in unsafe conditions, cannot remove themselves from unsafe housing, and are unable to both effectively self-isolate and feed their families, as well as being at high risk of destitution and homelessness. All too often, this forces families with NRPF to choose between following Government instructions to stay at home and isolate or risking their own and public health to go out to work and feed their families.

Particularly worrying in the context of a health crisis was the finding in JCWI's research, backed up by our experience of working with migrants with NRPF, that they often believe having NRPF means they are ineligible for free healthcare or to register with a GP. [JCWI found](#) that 58% of the migrants surveyed who had NRPF said they would fear going to the doctor if they were unwell in case they would be charged or targeted by the Home Office. This included migrants whose conditions of leave do in fact entitle them to access primary healthcare. This misplaced fear is exacerbated significantly by the lack of knowledge that is exhibited among GP practices about the entitlements of migrants. An investigation by the [Bureau of Investigative Journalism has found](#), in research that echoes JCWI's experiences with clients, that a worrying number of GPs turn migrants away when they try to register without proof of address, contrary to official guidelines.

National school closures and the introduction of remote learning were a challenge for all families, but for those with NRPF who often lack space to learn or digital access, this change was significantly more disruptive. In addition, children with NRPF are not eligible for free school meals. HMC [calculated](#) that around 230,000 children growing up in poverty missed out on the vital support of free school meals in London alone in 2018. Amongst these children were many of the poorest from families with NRPF. In the context of a global pandemic the dangers of this policy was thrown into sharp relief as increasing numbers of parents struggled to provide for their children.

The Government's decision in April 2020 to extend eligibility for free school meals to many children from families with NRPF during the pandemic was welcome. However, this was not enough to

protect some of the most vulnerable children from poverty, as the free school meals eligibility criteria still excluded thousands of extremely vulnerable children from undocumented families, who have remained without access to free meals for the duration of the pandemic, when that support was needed most.

Clients of Hackney Migrants Centre with NRPF conditions who approached our service for help following the outbreak of COVID-19 had had their entire lives turned upside down, falling into extreme poverty in a matter of weeks. The impact on children in families where parents were subject to NRPF included losing their home, going without enough food and basic essentials and in some cases being separated from their family as they couldn't afford to live together. Inevitably, the trauma and deprivation as a result of not having the welfare safety net disrupted children's education because they could not access online learning resources, or even where they could, their family circumstances were such that they could not focus on their studies.

There was a common thread that connected almost all of the cases of families with NRPF who fell into poverty due to the lockdown. The families affected were experiencing other marginalising factors that exacerbated the already precarious context of living with NRPF. They are mostly black or people of colour, mostly women and almost always single mothers. They were in low-paid, precarious work and inadequate housing. This highlights the key issue that one of the groups that is most likely to be subject to NRPF are also the group most likely to suffer the worse consequences of removing the welfare safety net.

Following intervention and assistance provided by HMC, many of these families' situations have stabilised because they have successfully applied to have 'NRPF' removed and applied for public funds; a process that usually takes a minimum of three months but often longer. There is no justification or public interest in an additional obstacle to accessing welfare support when the welfare system has eligibility criteria in-built. The families suffered poverty and trauma because of a system that requires them to overcome an additional obstacle before accessing the welfare support that exists in order to provide urgent respite for families in crises. The need among families with NRPF to meet their most basic expenses during the pandemic was extremely severe, HMC Collective Care Team distributed over £100,000 worth of supermarket vouchers to over 180 families and individuals with NRPF between April 2020 and September 2021.

#### **Case Study – Stella**

Stella has Limited Leave to Remain (subject to NRPF) as the primary carer of her 15-year old British daughter. In January 2020, she broke her leg so had to stop her work as a carer in a care home. She had to rely on friends and credit cards to support herself and her daughter while she was out of work as she was on a zero hours' contract. At the time, she was living in a box room with her daughter, sub-let from her friend, because she was unable to access Housing Benefit but could not afford to rent adequate accommodation. By the time she was able to return to work, the pandemic and subsequent lockdown measures prevented her from finding work. As a result, she accrued more debt and became entirely dependent on friends for support.

She needed to apply to renew her Limited Leave to Remain in June 2020 but had no savings to pay the fees, so approached HMC for help. She was referred to a solicitor who made an application for a fee waiver, which was granted, and applied for further leave to remain including submissions requesting the lifting of the 'NRPF' condition as she was destitute. In total, it took the Home Office 15 months to respond to her application, during which time her daughter had to move out due to their inadequate accommodation which led to queries as to whether she really was the sole carer. The family were separated because of the NRPF condition however instead of responding with urgency, the Home Office compounded the family's trauma and difficulties by delaying the removal of NRPF. Although Stella has gradually been able to find more work as the lockdown measures eased, she has accrued large debts that will continue to impede her ability to earn

enough to cover the costs of accommodation and basic essential for herself and her daughter.

This case study reveals the self-defeating nature of the system as the debts Stella and others like her accumulate while being subject to NRPF will likely impact their ability to save for future Home Office applications and is more likely to require fee waiver. Generally, by de-stabilising people's lives and preventing them from accessing stable accommodation and enough support to feed their family, NRPF increases dependency on public funds by making it more difficult for people to access stable employment and making it more likely that they will accrue debts. This has far reaching impacts that will stretch beyond the pandemic and lockdown as families will take years to recover from the debt and disruption to their lives.

#### **Case study – Blessing**

Blessing has 4 children under 10, who were all born in the UK and have lived here their entire lives. Blessing has been undocumented since she came to the UK in 2008. During the pandemic she was no longer able to work cash in hand to cover the rent. As a result, her family accumulated rent arrears and in May 2021 they were evicted from their home to temporary accommodation where they are reliant on Section 17 (social services) support. Despite their destitution, the fact she does not have papers has left her 10 to 5-year-old sons ineligible for free school meals throughout the duration of the pandemic.

“Because we don't have papers, [my son] is not entitled to eat free lunch in his school. From year 3, if you don't have papers, you can't do it. Even when they gave the kids some vouchers in his school, we couldn't claim it! Because his parents don't have papers, this means the kids don't have it [free school meals] even if they were born in this country. They should have equal rights to the other kids. There are a lot of things my kids just can't do. Because the other kids are eating the same thing, they want to eat it. They wish to eat together. And they need that food, more than anyone! HMC tried to write to the school, but the school said no. During the pandemic, the schools helped, but they only gave food to the people who had papers... I was embarrassed, that I wasn't able to give my kids food. We are like people neglected, abandoned. We are not part of the country. Why are you denying them their rights? We should be treated the same and have the same rights. My son was born here, brought up here, lived all his life here. Why are they doing this?”

#### **5. *What other financial support from the Government is available for families with NRPF who are facing financial hardship? How effective is this support?***

The options available to families with NRPF are extremely limited. While migrants with NRPF conditions are currently entitled to access the COVID Job Retention Scheme for furloughed workers and the equivalent for self-employed workers, all migrants with NRPF continue to be barred from accessing most forms of state support, including Universal Credit, Income-based Job Seekers Allowance, Income-based Employment & Support Allowance, Housing Benefit, Child Benefit, Child Tax Credit, Free School Meals, Disability Living Allowance, PIP, Working Tax Credit, Income Support, Local Authority Homelessness Assistance and many others.

One of the main problems is that people do not know what they are entitled to, and in general [tend to underclaim benefits](#). People with NRPF often think they are not eligible for anything, and often may not realise there is any COVID-related support available to them. In addition, many of the families with NRPF who are most vulnerable and in need of financial assistance are single mothers who may not be working and therefore would not likely benefit from these schemes. Further,

undocumented migrants and their children cannot benefit from any of these schemes and are barred completely from all state support.

As has been described elsewhere, getting NRPf conditions lifted requires the assistance of expert services, as well as an extremely high level of need, and is a process beset by significant delays.

#### **6. What role do other bodies, such as local authorities and third sector organisations, play in supporting children with NRPf?**

##### Local authorities

With an increased risk of destitution also comes mounting pressure on local authorities who will need to respond to increasing requests for support, particularly through housing and homelessness routes. The cost of housing families in these circumstances is passed on from the mainstream welfare support system to local authorities who are legally obliged to respond to the growing requests from destitute families. Section 17 of the Children Act 1989 places a general duty on local authorities to provide services to children in need or at risk of destitution regardless of whether their families have NRPf or are undocumented, although local authorities have discretion to judge what the child's needs are.

[Previous research](#) has shown that there is substantial variation across local authorities in their assessments and services provided to children in need from families with NRPf, which can be explained by factors such as the strength of local advocates or the existence of dedicated NRPf teams. The Local Government Association has [noted](#) that high numbers of people with NRPf have been approaching councils for support and have also warned that some councils will need extra Government help (and funding) to support all rough sleepers and vulnerable homeless people. Councils do not receive any specific funding from central government to support people with NRPf. The [latest data for 2018/19](#) showed that 59 councils were spending £47.5 million a year on NRPf service provision, prior to the coronavirus crisis.

The main justification given for the continued use of NRPf conditions has been to save public funds. However, as support from a local authority social services department does not constitute a public fund, NRPf conditions represent nothing more than a cost shunt from central to local taxpayers, places extra stress on already overstretched local authorities and pushes more families into destitution at a time of crisis. [As IPPR state](#), "[T]he current NRPf policy has... shifted the cost of providing support from central to local government, which is often required to step in at the point of crisis to fulfil its statutory duties. The pandemic has exacerbated these challenges, placing greater pressures on local authorities and creating a surge in applications to lift the NRPf condition from people facing destitution or other severe financial difficulties." The removal of NRPf is vital to both efforts to contain COVID-19, to prevent hardship amongst migrant communities and to prevent Local Authorities from becoming overwhelmed by requests for support.

##### Third sector organisations

The demand for advice and legal representation of migrants in desperate circumstances because of their immigration status far outstrips the capacity of JCWI and other similar organisations. Even a small number of people living in such a precarious situation is a serious problem which requires a considered and compassionate response. However, the reality is that it is not limited to a small number but is affecting tens of thousands of children and family.

##### Hackney Migrant Centre's experiences

Prior to the COVID-19 pandemic, HMC witnessed constantly how the lives of people with NRPf were precarious and how small disruptions, such as a short illness, could turn people's lives upside down. It was clear that many people, including children, were going to face homelessness and destitution but would not be able to rely on public services for assistance because of being subject to NRPf. For this reason, we initiated an emergency COVID-19 response, the 'Collective Care Team', which

became an established project from April 2020 onwards as the need was so severe and we were able to secure funding from emergency COVID-19 funds.

This project involved groups of volunteers supporting services users with food deliveries, shopping vouchers, accessing basic necessities and providing emotional and social support for those who were now isolated. Through this project, we supported over fifty families with weekly supermarket vouchers. We also provided deliveries of essential items, including medications and clothes, as well regular phone calls to check on people's welfare. This was the only source of assistance for many service users, and it continued for over a year as the demand for help was ongoing even as lockdown measures eased. The Collective Care Team project ended in September 2021 but the need for support remains as people with NRPF have continued to struggle to re-build their lives.

Collective Care Team distributed over £100,000 worth of supermarket vouchers to over 180 families and individuals with NRPF between April 2020 and September 2021

During the first few months of the pandemic, a significant amount of HMC's casework support was dedicated to advocating with Local Authorities and the Home Office to secure accommodation for families and individuals that were homeless. Despite the roll out of the 'Everyone In' scheme that was explicitly intended to provide accommodation for anyone homeless during the pandemic, those with NRPF experienced gatekeeping by many Local Authorities based on their immigration status and it required many hours of advocacy and casework support from HMC and partner organisations, including legal challenges, to secure access to the scheme for our services users with NRPF.

One service user was refused accommodation by their Local Authority while street homeless and suffering symptoms of COVID-19 in such egregious circumstances that it was covered in the [media](#). He was eventually accommodated but only after significant work on the part of HMC and our partner organisations. As a small charity, the number of people we were able to support was limited. There will be a huge amount of people with NRPF that were not able to access support from Third Sector organisations and will have suffered homelessness and destitution during a pandemic, putting themselves and others at risk, in circumstances that could have been avoided if they had access to the welfare safety net.

**7. *What impact has the pandemic had on these organisations' capacity to support children with NRPF?***

When the lockdown measures were introduced, HMC migrated to remote phone advice services. Further, HMC went from seeing 20 new clients to six new clients per week between February 2020 and September 2021. The increasing complexity of people's cases and the severity of their destitution meant that we could not continue to provide the level of support that was required for 20 people. Not only is demand increasing in terms of the number of people needing help, but the level of need at an individual level is increasing. Alongside this, the capacity of the legal aid sector has declined since LASPO in 2012 pushing further demand on to the Third Sector as the availability of publicly funded advice on welfare, housing and immigration has diminished.

HMC has not experienced an easing in demand for assistance as lockdown measures have been rolled back.

**8. *People with leave to remain on family or human rights grounds can apply to have the NRPF condition lifted in some circumstances. How effective has this measure been at preventing families from falling into serious hardship?***

Overall, the effectiveness of this measure has been significantly hampered by lengthy Home Office processes, unmettable standards of proof and poor decision making. The Home Office has [committed](#) to reducing the complexity of immigration and nationality law as a result of the Windrush Scandal. While, in theory, the current policy on NRPF allows for a limited number of people to apply to have their NRPF condition removed, a [recent court case](#) highlighted that this is incredibly difficult



in practice and does not prevent abject poverty. It is very difficult for families to make the application and prove destitution. In some cases in JCWI's experience, the Home Office has made spurious claims, for example, that sleeping on a friend's sofa does not constitute destitution. Further, even if families are successful in having the NRPF condition lifted, they are [punished by having an extra ten years added](#) onto their route to permanent settlement. This means a much longer wait before they are entitled to permanent status and naturalisation, thousands of pounds more in visa renewal fees, and many more opportunities to fall out of status altogether if they cannot pay the extra fees. As such, the system charges you more if you cannot afford to survive.

NRPF is only lifted in exceptional circumstances, leaving most people with no such option. Hundreds of families without income are unable to make the application or have been waiting weeks or months for a decision. The High Court found that the system is currently so difficult to escape that it constitutes a breach of Article 3 - the prohibition on inhuman or degrading treatment. The Court found that the requirement that a migrant must prove that they are actually destitute before NRPF conditions may be lifted was too high. It ordered that showing that they were about to become destitute ought to be enough to have NRPF conditions lifted. This is still far too high of a barrier, with individuals forced into abject poverty before they can even apply to receive mainstream support that is clearly so desperately needed. In addition, the removal of NRPF would speed up the process of simplification of the immigration rules, particularly as the policy is notorious in its complexity for Local Authorities, people affected and for those providing legal advice and support services.

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