



**Future
Governance
Forum**

A Fairer Pathway to Settlement

**Submission to the government's consultation on earned
settlement**

Contents

About The Future Governance Forum	2
About the authors	3
Introduction	4
Summary of recommendations	5
Purpose and principles	6
Earned settlement	7
Contribution	10
Residence	13
Eligibility and equalities	14

About The Future Governance Forum

The Future Governance Forum (FGF) is a progressive, non-partisan think tank focused on reforming the state with the ultimate goal of renewing the nation. We make politically credible recommendations for reforms that can be delivered nationally and locally, build strong networks to test new ideas, and collaborate and use our relationships with public, private and social sector leaders to innovate.

Our current programmes of work explore:

- In Power: how can we reimagine government to make it fit for the multi-dimensional challenges of the mid-21st Century?
- Mission Critical: how can we translate mission-driven government from ambition into action?
- Impactful Devolution: how can we meaningfully and permanently devolve power to regional and local levels in one of the most centralised countries in the world?
- Rebuilding the Nation: how can we utilise innovative models of public and private investment to spur growth and rebuild our crumbling infrastructure?
- Institutional Renewal: how can we reform existing state institutions, and establish new ones, so they are fit for purpose and built to last?

By prioritising these questions we are thinking about new progressive models of governance for the long term. Our working model is to convene experts and find ways in which we can bring perspectives from very different organisations together to suggest ways in which the “how” of government could be more effective at every level.

About FGF’s Future of Asylum Project

FGF’s ‘Future of Asylum’ project is seeking answers to the question: in today’s world, how can the UK deliver an asylum system that works effectively, is consistent with international law, and sustains public confidence.

About the authors

Beth Gardiner-Smith is a Senior Policy Associate at The Future Governance Forum and a non-resident fellow of the Migration Policy Institute. She was the founding CEO of Safe Passage International, a European organisation that provides legal advice on safe routes to children and adults seeking protection in Europe.

Emily Graham is a Policy Associate at The Future Governance Forum. She previously led Safe Passage International's policy and public affairs work and has a background in the voluntary sector, focusing on social inclusion, protection and human rights. Emily is also a Trustee of Care Rights UK.

Introduction

The proposed changes to settlement are set to be some of the most significant to UK immigration policy in a generation.

A decade of volatile net migration - including record levels of net migration between 2021-2024 - and growing concerns over social cohesion mean it is right for the current government to consider how immigration is best serving the country and whether settlement policy is supporting positive social outcomes.

Past government policy on migration too often lacked coherence of vision and purpose, with competing and short-term objectives layering complexity into a system without considering long-term impacts or improving outcomes for the British people.

Having taken office following a period of record net-migration both work and humanitarian, there are also real questions about what will happen when the estimated 1.6 million people reach eligibility to settle in the UK over the next four years. Determining how to manage the scale and pace of change this represents in communities and anticipating its implications for certain sectors, such as care, as well as the welfare budget, raise important wider questions about how the UK can best manage the impacts of migration and promote integration.

While the politics of the moment may demand audacious policymaking, successful delivery of the policy's core objectives depends on engaging with some very real trade-offs. Incentivising English language, employment and volunteering can all improve integration, but extended periods of migrant 'unsettlement' can harm it, with long-term consequences for community cohesion. Whatever is announced must also be deliverable in the context of an already unwieldy system and real-terms budget cuts. Getting this wrong, risks further eroding public trust or resolving one issue only to create several more elsewhere.

As the Home Secretary said when introducing the earned settlement reforms, "We have built a multi-faith, multi-ethnic democracy that is pluralistic, grounded in tolerance towards difference."¹

Despite a heated national debate, and real challenges to address in border management and cohesion, the UK has a strong story to tell on what it means to sustain a successful, multi-faith, multi-ethnic democracy today. The UK's integration policies score above the EU average, according to the Migrant Integration Policy Index², while a majority of the public support a multicultural Britain.³

¹ Foreword from the Home Secretary to "A fairer pathway to settlement: A statement and accompanying consultation on earned settlement"

² [The Migrant Integration Policy Index](#)

³ [HOPE not hate's 'Giga poll'](#) found that 80% enjoy mixing with people of different backgrounds, ethnicities & religions.

Summary of recommendations

We recommend the government:

1. Ensure any changes are informed by careful consideration of their impacts, including equalities, child rights and economic impact assessments.
2. Cap routes to settlement at 10 years, and offer everyone the opportunity to earn an accelerated 5 year route.
3. Retain the private life route to ensure a ceiling on qualification period for settlement for those who do not meet the mandatory criteria, and prevent indefinite unsettlement.
4. Maintain existing access to benefits at the point of full settlement.
5. Exempt refugees and others receiving protection in the UK from the benefits claim penalty for an initial two and a half years after they get status in the UK.
6. Retain the intention but delay implementation of the 'civic contribution' element and launch a specific consultation with the voluntary sector on its design and delivery.
7. Allow refugees and others receiving protection in the UK to demonstrate contribution through volunteering or civic contribution, where the mandatory earning threshold can't be met.
8. Exempt exploited workers from the overstaying penalty.
9. Apply the new earned settlement policy only to those people who arrive after the date of implementation.
10. Grant adult dependants and children leave in line with main applications and maintain private life routes for children and young people, providing long-resident children the option to pursue status faster.
11. Consider mitigations to reduce the cost of fees for vulnerable groups and employers.

Purpose and principles

The government has set out a clear purpose for its reforms, on which we agree: to ensure those granted settlement are well-integrated, economically self-sufficient, and committed to the communities they join.

As well as optimising these outcomes, we would suggest the government also ensure they do not undermine other key missions, by setting a further three tests for the policy to meet:

1. **Support the government's ambitions to reduce child poverty:** The government aims to lift half a million children out of poverty by 2030. Reforms to settlement should not push more children in Britain into poverty.
2. **Promote economic growth and higher living standards:** The government is committed to raising living standards in every part of the United Kingdom. Reforms to settlement should therefore support the growth agenda.
3. **Treat migrants already here fairly and consistently:** Transparency and consistency are fundamental principles of our legal system. Policies must be fair to those already here contributing and on their way to making Britain their permanent home.

In summary, the key principles for reform should be:

1. Deliver stronger integration and economic self-sufficiency
2. Reward contribution and commitment to community
3. Lay out clear, consistent and comprehensible rules
4. Support the government's ambitions to reduce child poverty
5. Promote economic growth and higher living standards
6. Treat migrants already here fairly and consistently

Recommendation: Ensure any changes are informed by careful consideration of their impacts, including equalities, child rights and economic impact assessments.

Earned settlement

There is good evidence that acquisition of language, employment and volunteering all have the potential to improve integration outcomes for those making Britain their home and for the cohesion of communities. They also tell an important story to the public at large about the contribution of migrants, and what is expected of everyone who wishes to become a permanent member of our society.

We welcome the government's focus on these areas and encourage policymakers to consider all the enablers and barriers that migrants and refugees face in these areas. Policymakers must however carefully weigh reasonable measures to incentivise contribution against the known negative impacts on integration that long delays to settlement bring.

A 10 year baseline qualifying period for settlement, 15 year baseline for care and non-graduate workers, and 20 year baseline for recognised refugees with 'core protection' status, would see the UK having the longest pathways to settlement in Europe - well above the 5 year route to settlement set out in EU law. Furthermore, the proposed penalties would see many facing an even longer route to settlement, up to 35 years in some cases.

For children of migrant workers, this differential treatment has profound consequences, and is not compatible with Labour's opportunity mission. If their dad is a banker, they could get settled status after 3 years but if their mum is a care worker, they may have to wait 15 years.

Evidence indicates citizenship offers a boost to wages and can thus facilitate integration.⁴ In contrast, setting thresholds to permanent residence too high can increase vulnerability and reduce incentives to invest in host communities and increase the undocumented population.

Research from Denmark found that increasing the requirements for permanent residency reduced labour market integration among refugees. Contrary to the policy objectives, the Danish reforms, which increased the length of time to obtain permanent residency and imposed employment and higher language requirements, resulted in a 30% reduction in the full-time employment of refugees and had no effect on the share of individuals who passed the required language level test.⁵

UNHCR has expressed significant concern about the long route to settlement for refugees proposed by the government, noting that refugees, unlike migrants, lack the

⁴ Bratsberg, Bernt, James F. Ragan, Jr., and Zafar M. Nasir. "[The Effect of Naturalization on Wage Growth: A Panel Study of Young Male Immigrants.](#)" *Journal of Labor Economics* 20, no. 3 (2002): 568-97.

Max Friedrich Steinhardt, 2008. "[Does citizenship matter? The economic impact of naturalizations in Germany.](#)" Development Working Papers 266, Centro Studi Luca d'Agliano, University of Milano.

⁵ Arendt, J.N., Dustmann, C. and Ku, H., 2025. "[Permanent residency and refugee immigrants' skill investment.](#)" *Journal of Labor Economics*, 43(2), pp.293-318.

protection of their country of origin and citizenship rights.⁶ UNHCR also notes that requiring an 'excessively long period of residence before becoming eligible to settle and access naturalisation proceedings would be at variance with Article 34' of the Refugee Convention.

There is also limited evidence that longer routes to settlement deter asylum seekers, with research finding that asylum seekers do not usually know about a destination country's asylum policy nor access to rights and benefits.⁷ We would caution the government to remain clear about the central objective of its reforms - to improve integration - and not to use these policies to deliver border control, for which other measures are both more effective and risk fewer negative integration consequences.

Recommendation: 10 years should be the ceiling on settlement qualification for eligible applicants.

- (a) **Cap routes to settlement at 10 years:** No one eligible for settlement should wait more than 10 years to qualify for settlement, including recognised refugees and all skilled visa categories. Government may decide to apply penalties (or accelerators) but these should not take individuals beyond this 10-year ceiling on access to settlement.
- (b) **Everyone can earn an accelerated 5 year route to settlement :** All individuals who are eligible for settlement, regardless of job or background, should have the ability to reduce their pathway to settlement to 5 years, if they can demonstrate a higher level of contribution. This would include a route to 5 years for people who contribute through volunteering, other civic contributions, or work in public service.
- (c) **5-year default for those here on humanitarian pathways:** The government has already rightly proposed a five year default route for British National (Overseas) (BN(O)) visa-holders, which should be extended to all those coming to the UK under humanitarian pathways. This should include arrivals under community sponsorship, which would signal the government's commitment to the new schemes and reinforce the integration and welcome facilitated by local sponsors.

Research by IPPR, Praxis and GMIAU found that the existing private and family life route to settlement created financial hardship, with 62% of respondents saying they struggled to meet the cost of utilities like electricity and heating, and 57% saying they struggled to meet the cost of food.⁸

⁶ UNHCR, [Observations on 'Restoring Order and Control' Asylum Policy Statement](#), 9 January 2026

⁷ Crawley, H. and J. Hagen-Zanker (2019). Deciding where to go: Policies, people and perceptions shaping destination preferences. *International Migration* 57 (1), 20-35

Home Office (September 2020) [Sovereign Borders: International Asylum Comparisons Report](#)

⁸ IPPR, Praxi & GMIAU, "[A punishing process: Experiences of people on the 10-year route to settlement](#)", 2 March 2023

Currently there is no proposed ceiling on qualification period before settlement, with some individuals never meeting or continually 'narrowly missing' the requirements to qualify.

Recommendation: Retain the private life route to ensure a ceiling on qualification period for settlement for those who do not meet the mandatory criteria, and prevent indefinite unsettlement.

Contribution

Eligibility for public funds

In awarding settlement the government recognises that an individual's home is the UK, and they are no longer subject to any time limit on their ability to stay. It is a threshold moment where a newcomer is recognised as a permanent member of the community, with equal access to work, study and access benefits to any other permanent member of the community.

Removing access to benefits for this group would be a significant departure from the public's settled view about what it means to obtain permanent residency in the UK, and risk entrenching existing inequalities within communities, particularly for children.

Children born in the UK to parents with settled status are normally classed as British citizens automatically at birth. Imposing no recourse to public funds (NRPF) conditions on parents with ILR would mean many British citizen children not having access to benefits as a result.

The proposal also cuts across the government's 'contribution' narrative on how settlement is acquired. If higher thresholds are required of migrants to demonstrate contribution to Britain in order to gain settlement in the first place, this should be framed as being in service of 'unlocking' access to public benefits at the point at which settlement is earned.

Recommendation: Maintain existing access to benefits at point of full settlement.

In addition, to facilitate the integration of those receiving protection in the UK, whether via asylum, resettlement or a bespoke humanitarian route, we propose that these groups be exempt from the benefits claim penalty for any claims they make in the initial two and a half years after getting status in the UK. This would enable those here for humanitarian reasons to access the necessary support to establish themselves in the UK, without having negative repercussions on their future access to settlement.

Recommendation: Exempt refugees and others receiving protection in the UK from the benefits claim penalty for an initial period of two and a half years after they get status in the UK.

Civic contribution

It is welcome that the government is seeking to recognise civic contribution, in addition to fiscal, as part of the new framework. Alongside working in our public services and local business, migrants and refugees often volunteer with charities and in local faith institutions. Research shows a positive two-way relationship

between volunteering and social cohesion⁹, and if properly incentivised and supported the measure has the potential to support integration.

Volunteering can be particularly important for refugees who arrive without an employment offer and often face greater barriers to gaining sustained employment, which will be essential in order to become eligible for settlement under the new proposals. As proposed above, beyond the time-reduction on the qualification period, we recommend considering how volunteering/civic contribution could be counted in lieu of refugees being able to fully meet the mandatory income criteria for settlement.

However, the proposals also need careful design to get right. There are equalities implications - not everyone has the ability or opportunity to volunteer, particularly those with caring responsibilities. And incentives can also produce unintended consequences - including disincentivising or hindering the acquisition of formal employment if, for example, the criteria for the civic contribution time-reduction is set at a threshold so high it couldn't reasonably be sustained alongside work.

Safeguarding and capacity concerns have also been raised by the voluntary sector. While some organisations have raised in-principle objections suggesting it would no longer be time freely given, we would suggest that there is precedent for incentivising volunteering in this way. The UCAS system has long given points for volunteering via accredited schemes, while the NHS Cadets programme is recognised as providing a 'volunteer to career' pathway for healthcare workers.

The policy has the potential to increase public support for migration, by recognising the valuable contribution of migrant and refugee volunteers, as well as encourage more people to volunteer. However, it will require in-depth engagement with voluntary organisations to design and deliver.

Recommendation: Retain the intention but delay implementation of the 'civic contribution' element and launch a specific consultation with the voluntary sector on the design and delivery of the policy to get the detail right.

Exemptions to the mandatory earning requirement

The government is right in its ambition to incentivise work, particularly amongst communities with low employment rates which can inhibit integration. However, there are again trade-offs to consider.

The proposed mandatory earning requirement for settlement will have significant impact on access to settlement for some groups, and risks blocking some from obtaining settled status altogether. The Migration Observatory has warned that this new requirement will likely affect the largest number of people, with hundreds of thousands potentially affected.¹⁰ Those most affected are likely to be dependants,

⁹ Belong Network, Abrams, Horsham & Davies, '[Linking Volunteering and Social Cohesion](#)', March 2023

¹⁰ The Migration Observatory, '[Changes to settlement: what do they mean?](#)', 10 February 2026

refugees and those who have come to the UK under the UK's humanitarian schemes, like the BN(O) route.

To ensure that dependants, including women with caring responsibilities, are not blocked from accessing settlement, we propose granting dependants leave in line with the main applicant (see section 7 below).

According to the latest Home Office analysis, around 45% of refugees granted protection or resettled in the UK between 2015 and 2023 were not working by their fifth year in the UK, with resettled refugee women having the lowest annual average earnings.¹¹ Additionally, the latest data for BN(O)s from Hong Kong suggests that 30% of adults were not in employment.¹²

While we support the government's ambition to encourage more refugees to obtain good lasting employment, we are concerned that without government attention to address the barriers to refugee employment alongside these changes, the mandatory earning requirements will result not in higher employment rates but in lower access to settlement, which we do not understand to be the government's policy intention.

In recognition that these routes are designed to deliver on humanitarian objectives, rather than economic migration, we recommend that the government considers exempting these groups from the mandatory earning requirements, or looks at how volunteering/civic contribution could be counted instead.

Recommendation: Allow refugees and others receiving protection in the UK to demonstrate their contribution (in whole or part) through volunteering or civic contribution, where the mandatory earning threshold cannot be met.

¹¹ Home Office, [Refugee Integration Outcomes \(RIO\): Employment from 2015 to 2023](#), 27 November 2025

¹² UK in a Changing Europe, [What lessons can be drawn from the Hong Kong BN\(O\) visa scheme for the UK's support for new migrants?](#), 28 January 2026

Residence

Protections for exploited workers

The proposed 15-year pathway for low/medium-skilled workers would be unprecedented among democracies. Workers in low/medium-skilled jobs would be under visa rules for a decade and a half, leaving them more vulnerable to exploitation. When a work visa is tied to an employer, this increases the risk of exploitation as challenging employer behaviour can lead to revocation of the employee's status in the UK. Not only is this lengthy period of work sponsorship undesirable from a workers' rights perspective, but the overstaying penalty could unfairly penalise exploited care workers where there is well-documented evidence of exploitation of those who arrived on the Health & Care visa.¹³

Care workers here in the UK do one of the most important jobs in our society: care for our older relatives and disabled family members. While the visa route may have been poorly designed and too many employers fraudulent, the vast majority of these workers came in good faith and have followed the rules. Further enforcement often relies on workers feeling secure to step forward and report bad practice without fear for their status.

Social care workers whose sponsors lose their license as a result of unethical and abusive employer practices could become 'displaced' and end up overstaying their visa. This could result in a 35 year wait for settlement (15 year default for adult social care workers plus the 20 year penalty for overstaying). Care workers who experience abuse, exploitation and other unethical practices should not be penalised themselves for their employer's unethical actions. At a minimum, those who cooperate with and assist in investigations of abusive employers should be exempt.

Recommendation: Exempt exploited workers from the overstaying penalty.

¹³ See Committee of Public Accounts (PAC)'s inquiry & report on [Immigration: Skilled worker visas](#), 4 July 2025

Eligibility and equalities

Transitional measures: retrospective application

Retrospective application to 1.3-2 million people sets a significant precedent in UK immigration law, which future governments could use to go further when changing the terms of existing residents' right to remain. The Windrush scandal showed how changing terms for settled populations can generate considerable harm and lead to many falling out of legal status unintentionally. We would strongly caution against applying the full policy changes retrospectively for these reasons.

Nonetheless we recognise the government's challenge in managing the potential impact of an estimated 1.6 million people gaining settlement over the next 4 years, particularly on the welfare budget and access to social housing.

We suggest that a 10 year ceiling already provides a mitigation for the government in terms of low and medium-skilled workers, including those on the Health and Care visa. This group is most likely to face the full 10 years as they are not higher earners and less likely to have the capacity to volunteer, in addition to work. This would see those who arrived from 2022 gaining settlement no earlier than 2032. An additional 5 years on top of the standard qualifying baseline period (totalling 15 years) for this cohort simply delays the potential impact, without strong evidence it will increase the likelihood of large numbers leaving the UK before reaching settled status. While it is unclear what impact prolonged periods of unsettlement combined with high fees could have on emigration, past data suggests people who have been in the UK for a long time are more likely to stay permanently as they develop social and economic ties, with the presence of family increasing the likelihood of remaining.¹⁴

Recommendation: The new earned settlement policy should apply only to people who arrive after the date of implementation.

If the decision is to apply the changes retrospectively, however, then we encourage the government to implement transitional measures. At minimum, anyone currently on routes to settlement should be exempt from any penalties extending their qualifying period beyond the default. This is particularly relevant for penalties relating to benefits claimed legitimately by families already here, who could not have known that they would be penalised for claiming benefits before the earned settlement policy was announced.

Children and families

The government is right to have kept open the question of how the policy will be applied to children and will interact with existing child rights law. Children born in the UK or growing up here deserve separate consideration to those who come to the

¹⁴ Hall, Manning, Sumption, Sep 2024, [Why are the latest net migration figures not a reliable guide to future trends](#)

UK as adults, as children brought here by their parents have no agency in their arrival and children have specific needs and vulnerabilities.

Those who have grown up in Britain and identify as British should have a clear and timely path to permanent status, either as dependants or in their own right. Deporting adults to countries they left as infants is wrong and out of step with the majority of public opinion. A settlement system should also not allow the legal status of children to lag far behind integration.

More than 300,000 children will be affected by this policy, according to analysis by IPPR.¹⁵ Lengthening the routes to settlement creates uncertainty for families, extends the time in which families cannot access public funds and makes it more difficult for young people to enter higher education. Proposed penalties for accessing public funds could also disincentivise those families who are eligible to have the NRPF condition lifted (because their child's welfare is at risk) from doing so, potentially exacerbating child poverty.

The government should also avoid creating a policy framework in which different members of the same family group are likely to become eligible for settlement years apart, and have different immigration statuses.

There are particular concerns around the application of the policy to dependants, some of whom may struggle to meet the mandatory requirements, particularly the new minimum annual income requirement, regardless of their household income. This could result in some dependants being blocked from settlement entirely.

Those most likely affected will be non-working spouses, primarily women, including those who are unable to work due to caring responsibilities, long-term illness, disability, or maternity leave. Analysis by the Migration Observatory shows that around half of the 328,000 adult dependants of Skilled Workers in 2023/24 were not working.¹⁶

We suggest it is for families to decide how to organise their households, and particularly to manage the division of labour between employment and child-care. While the government could look to assess the mandatory earnings requirement on a household basis, this would be far more complex and resource intensive than granting dependants leave in line with the main applicant. To aid with integration, the government could decide to retain other mandatory requirements for dependants, including English language requirements.

Recommendation: Grant adult dependants and children leave in line with main applications and maintain private life routes for children and young people, providing long-resident children the option to pursue status faster.

¹⁵ IPPR, "[Far from settled: The government's 'earned settlement' consultation](#)", 9 February 2026

¹⁶ University of Oxford's Migration Observatory, "[Changes to settlement: what do they mean?](#)", 10 February 2026

- (a) **Grant adult dependants leave in line with the main applicant:** Granting dependants leave in line with the main applicant, rather than assessing them on their own terms, would prevent the undesirable situation of mixed-status families and better protect dependants who might otherwise be unable to meet mandatory requirements in their own right.
- (b) **Grant leave in line for child dependants, with security for children turning 18 during the wait for settlement:** Children should be granted settlement in line with main applicants, as detailed above, even if they become adults during the wait for settlement. Based on the principle that the original decision to come to the UK was made when the dependant was a child, there should be no cut-off age for dependant applications, but child dependants should be able to move to a private life route (as below) if they choose.
- (c) **Children born in the UK receive settlement after 7 years:** Maintain the existing qualifying period for children born in the UK, if they are not eligible for ILR as dependants, recognising children cannot demonstrate contribution in the same way as adults.
- (d) **Children and young people not born in the UK to be on a 5-year route after 7 years:** Maintain the existing 5-year private life route for children not born in the UK, if they are not eligible for ILR as dependants. Young people aged 18-24 who have lived in the UK at least half their life should also be on a 5-year route.
- (e) **Exempt families with children from benefits claim penalty:** Those on the existing 10 year family and private life routes who apply for a change of conditions should not face a 5-10 year penalty for accessing benefits. This is likely to deter parents with children who are destitute from coming forward to apply for a change of conditions and risks undermining the government's ambitions on child poverty.

Affordability for families and sponsoring organisations

Extending the route to settlement will double or even triple the costs for some individuals, families and employers, who will need to renew their status in the UK multiple times.

The total direct cost¹⁷ for a family of four in fees incurred en route to settlement would be £36,842 for a five year route to settlement or £61,416 for a ten year route.

In cases where the employer pays all fees, the total cost for employers before tax for a family of four on a five year route is £44,492 or if they are on a ten year route, £75,666. HMRC however treats employers paying immigration fees on behalf of their employees as a taxable benefit, even those which employers (and not employees) are obliged to pay. This significantly increases costs, amounting to £60,131 for a

¹⁷ Fees include initial fees for visa, plus extension, Immigration Health Surcharge and application fee for ILR.

family of four on a five year route, or £100,679 for an equivalent family on a ten year route.¹⁸

Visa fees play an important income generation role; however, the government should consider carefully the balance between higher revenue from fees and disincentivising employers from bringing in talent to the UK, as well as reducing the spending power of families here because of the need to save for fees.

Recommendation: Consider mitigations to reduce cost of fees for vulnerable groups and employers

- (a) **Expand visa waiver eligibility to cover all immigration routes:** Currently fee waivers are only accessible to those on specific family routes. A general fee waiver could be targeted at the most vulnerable on all visa routes to support individuals and families who risk destitution as a result of repeat reapplications for limited leave to remain under the new earned settlement rules. A fee waiver could be available to those who could not afford fees because they are homeless, cannot meet essential living costs, or are on a very low income and where paying the fee would harm their child's wellbeing.
- (b) **Reduce automatic renewal points to 5 and 10 years for all family visa categories** (unless possible to qualify for ILR earlier). This would help to maintain existing costs for groups moving to a longer route to settlement.
- (c) **Remove taxation for the Certificate of Sponsorship and Immigration Skills Charge:** This adds considerable costs for employers. Taxing the visa fee and Immigration Health Surcharge is not unreasonable, as if the employer were not to pay these costs the employee would need to, out of their own post tax earnings. But the law prevents an employee from paying the Immigration Skills Charge and Certificate of Sponsorship so it does not seem reasonable to treat these payments as taxable.

¹⁸ Figures given assume the employee is a basic rate tax-payer. If additional rate tax payer, total cost for a family of four would be £74,988 for a five year route and £127,561 for a ten year route.