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**Ed Humpherson, Director General for Regulation**

Jon Simmons  
Head of Protection, Irregular Migration and  
Asylum Analysis and Migration Statistics  
Home Office  
(by email)

27 September 2021

Dear Jon,

**Enhancing data on statistics about those subject to no recourse to public funds (NRPF)**

Firstly, thank you to you and your team for engaging with my team regarding this complicated picture of those who are subject to no recourse to public funds (NRPF). We wrote to you in June 2020 following concerns about the lack of transparency around those who apply to have a change to the NRPF condition. Helpfully, Home Office now publishes quarterly statistics on the numbers applying for a change to the condition and the outcome of these applications.

These statistics have proved to be very useful. However, there are further questions around how many of these applications are initially rejected but are later accepted on re-application. In discussions with your team, we understand that the published statistics are based on case files. Each applicant has a unique identifier. However, repeat applications are not currently logged as a new application but rather as a reconsideration of a previous application. As a result, to establish if an application is resubmitted would be costly and challenging given the current casefile system.

While we appreciate that it is a challenge to provide this information now due to how the data are collected and held, we do think it is important to do so as soon as it is possible. It was good, therefore, to hear how the transformation programme should address the current issues and enable the future publishing of data on repeat applications. In the new system each application will be logged as independent from any prior related applications. It should then be possible for these cases to be linked by a unique person identifier. This should make the process of identifying repeat applications simpler. We understand that the new system should be operational before the end of this calendar year. It would be helpful if the Home Office would make public its plans for developing the published statistics.

There has also been an interest in the reasons why these applications might be rejected in the first instance. We understand that people can apply for a change in condition for reasons such as destitution or where there are concerns around the welfare of a child. In terms of transparency, it would be useful to know the reasons given for an unsuccessful application to lift the condition although we understand that these reasons are

not currently recorded in a reportable field. It would be helpful to understand if this is likely to change with the transformation programme.

Once again, your team has been very helpful, and I appreciate the time it has taken to talk to us alongside other pressures. We look forward to hearing your plans and timelines for developing these statistics and updates on the delivery of the transformation programme.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ed Humpherson', with a stylized, cursive script.

Ed Humpherson  
Director General for Regulation