

From Jon Simmons,  
Deputy Director for Migration Statistics,  
Home Office Analysis & Insight

Ed Humpherson  
Office for Statistical Regulation,  
UK Statistics Authority

13th January 2022

Dear Ed,

I wrote to you on the 15<sup>th</sup> December in response to [your letter](#) of 27<sup>th</sup> September on our work in regard to No Recourse to Public Funds. I am now able to provide you with an update including the latest change of condition statistics and this letter now supersedes that one.

The Home Office has been publishing statistics on Change of Conditions applications in relation to NRPF since July 2020. The [latest update of these statistics](#) were published this week, and these show that in the latest quarter the number of applications to request the NRPF condition be lifted has returned to pre-pandemic levels. The number of applications rose sharply following the onset of the global pandemic to a peak of 5,770 applications in Q2 2020, in part no doubt due to the difficulties some foreign nationals experienced in being able to return to their countries of origin in light of the travel restrictions put in place. The number of applications has since declined each successive quarter and in Q3 2021 there were 888 applications, slightly below the average of 900 per quarter in the year ending March 2020. In the latest quarter decisions were taking an average of 31 days to decide, and 80% were accepted.

As noted in your letter, you are already aware of our intentions to improve the information available in relation to those with a No Recourse to Public Funds condition from the regular conversations we have had with the OSR on this topic.

As your letter from September noted, there are some cases where change of condition applications are initially rejected but the applicant subsequently re-applies. And as you also note, our current statistics are drawn from an administrative system designed to process individual cases and not keep a record of individuals. Home Office systems are undergoing a considerable process of transformation, including the introduction of a new integrated caseworking system to replace the legacy in-country immigration casework system, and these changes should begin to deliver a variety of new capabilities once they are in place and operational, which we hope might be later this year.

At present, it is not straightforward to establish repeat claims in our casework system, but we believe it may be easier to do so once the new casework systems and supporting data

infrastructures are in place. However, there is an indication on the case records of whether an individual has previously applied for a Change of Condition. An initial look at this information suggests that over the six quarters since the beginning of the pandemic in Q2 2020 less than one in twenty Change of Conditions applications appear to be a subsequent application that has been linked to the same grant of leave. In this small subset of cases, around one in five resulted in a previous rejection being superseded by an accepted application. These would include cases in which an initial rejection has been 'reconsidered' as well as those where the individual's circumstances have subsequently changed and as a result they have made a second application. This does at least provide some indication of the likely extent of repeat applications, but we would emphasise that these are initial estimates based on the current systems and we are not yet fully confident in their accuracy. We can look to do more to investigate this question once the new data systems are in place.

You also asked about the reasons why applications are rejected. We are not currently able to collect information in this way. It is worth noting that the decision to refuse an application for a change of conditions will usually be because the individual does not meet the criteria set out in the Immigration rules. As the department is only rejecting the access to public funds element of a person's leave to remain, the immigration decision to grant the individual leave to remain is not affected.

As you know, applications for a Change of Condition are only available to those on Family and Human Rights routes and those on the Hong Kong BN(O) route and so may not provide a full picture of the people who might be in need of assistance from public funds. We have discussed the lack of available data on migrant poverty more generally, both within government and with the sector supporting people who have found themselves in financial difficulty. We have been in discussion with DWP analysts as to whether they have any data sources which might provide additional insights in this regard, and also propose to work with the Office for National Statistics (ONS) to look at the 2021 Census data, once that is released next year, to establish whether this source might provide further insight into the number and location of poorer migrant households. It is unclear whether these sources can provide additional insight at present, but we are keen to investigate this further.

Finally, I was pleased to see the OSR recognised the work this department has undertaken to improve the data we publish on No Recourse to Public Funds in the [Annual Review of UK Statistics Authority Casework, 2020/21](#) (page 12) reporting the department's publication of the new statistics from July 2020 and our continuing engagement on these issues. As noted, the latest update on the Change of Condition application statistics is now published. I would like to take this opportunity to assure you that we are committed to ensure there is a well-informed public debate on these issues and are pleased that Home Office data is contributing to a better understanding of these issues.

With best wishes,



Jon Simmons

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