

Assurance Review (Looked after Children and Care Leavers) Annex 6a: West Midlands Final Regional Report August 2025

**Local authority responses on support for Looked After Children
and Care Leavers in making applications to the EU Settlement
Scheme**

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Introduction

The Independent Monitoring Authority for the Citizens' Rights Agreements (IMA) has completed individual assurance reviews with all 14 local authorities in West Midlands.

Individual assurance reviews were conducted with local authorities who had not, during a previous information gathering exercise conducted in December 2022, provided sufficient information to demonstrate that they were discharging their responsibility to support eligible looked after children and care leavers to make an application to the EU Settlement Scheme (EUSS). The methodology and rationale for this work has been outlined in our [main report](#).

To deliver these reviews, the IMA sought assurance in the following three areas:

1. robustness of the identification processes
2. accurate record keeping
3. completion of retrospective checks

This updated regional report will reflect the findings of these reviews.

Assurance Review findings

1. The IMA is assured that all local authorities in the West Midlands had (or have now implemented) robust processes in place to identify eligible looked after children, care leavers and their family members. Local authorities demonstrated they were recording the nationalities and place of birth of children and young people who entered their care, assisting with the identification of potentially eligible applicants to the EUSS. This included strategies for the identification and support of non-EU and EEA EFTA family members.

2. The IMA is assured that appropriate record keeping procedures are in place as set out in **the guidance** issued by the Home Office along with confirmation that retrospective checks of all eligible children and care leavers in their remit have been completed and remain ongoing.

3. Many local authorities had clear processes in place to identify and support eligible cohorts but did not provide details of identification and record keeping processes in their initial reply. These were evidenced during individual assurance reviews.

4. Many local authorities took proactive measures to review their current processes and implement changes as a result of this review and were keen to share these enhancements with the IMA. These are further outlined on pages four, five and six of this report.

5. The IMA notes that it experienced difficulty engaging with two local authorities in this region to gather additional information. Once the IMA were able to secure meetings, additional steps were taken to support the local authorities with the reviews, answering questions via email, telephone calls and MS Teams meetings to clarify information which subsequent resulted in all local authorities engaging fully.

6. One local authority reported that the Home Office guidance was unclear and made it difficult to create and implement their own guidance. Following engagement with the IMA, this local authority had a clearer understanding of their obligations and amended their systems to make their process clearer and more streamlined.

7. Where appropriate, the IMA shared best practice principles and further guidance with local authorities. This assisted local authorities to undertake proactive reviews of their processes, ensuring nationality is captured for all children and care leavers, and dates for when pre-settled status can be changed to settled are logged. As a result, five local authorities were able to identify and implement improvements before meeting with the IMA. These improvements are outlined further on pages four, five and six of this report.

8. Two local authorities reported that, as part of their process, they consulted an Independent Reviewing Officer (IRO) to review each case and check for potential eligibility for EUSS. This provided an additional level of assurance to the IMA.

9. As a result of IMA engagement and implementation of enhanced identification, record keeping and retrospective checks processes, there were a further 71 looked after children and care leavers identified as eligible to apply for the EUSS and were subsequently supported.

Improvements by local authorities

System Improvements:

10. One local authority stated, following IMA engagement, they had created an EUSS tracker to specifically record the details of eligible children and track the application process, including when a child is able to upgrade their pre-settled status to settled status.

11. Four local authorities reported they had implemented technical changes to their case management systems. These changes ensure that nationality, ethnicity, and immigration status are recorded in line with the Home Office guidance.

12. One local authority reported that following IMA engagement, their IT system had been developed further and have been working accross their service teams to ensure they are able to record the child or care leaver's status as a notification on the front screen.

13. One local authority confirmed that technical changes were made to their system to record nationality, pre-settled and settled status, and this allowed for additional eligible children to be identified through new reporting tools.

14. One local authority reported that they have undertaken full data cleanse exercises of all cohorts via a manual trawl: Children in Need, Child Protection, Looked After Children and Care Leavers, to ensure their status is accurately recorded. This has guaranteed that all children and care leavers apply in time for their appropriate status.

15. One local authority advised that they have implemented two 'safety nets': Practice Managers and Independent Reviewing Officers. These ensure that the data is reviewed for eligible children in two separate areas, using nationality as an identification tool, in addition to the front-line recording and assessing by Social Workers.

16. One local authority reported that they had created a small working group of managers, legal and systems team representatives, to look at any system and policy changes that may be needed to identify eligible children at the earliest point and implement the policy and guidance. They also identified a key legal advisor who specialises in this field, they will be supporting alongside Team Managers.

17. Further to IMA engagement, one local authority confirmed that nationality is now recorded as a mandatory field on the case management system and all records have been updated. This has allowed for further retrospective checks and allows the local authority to assess and capture nationality for all new children entering their service.

Policy Improvements:

18. Five local authorities reported specifically using IMA 'Best Practice' guidance that was shared with them, to either implement their own written guidance, implement improvements, and/or enhance their guidance further. This ensured all eligible children and care leavers would be identified and retrospective checks conducted to make sure none had been previously missed.

19. Several local authorities reported that they had delivered EUSS training to social workers and family support workers, using their internal hubs to promote awareness.

20. Several local authorities have reported that they have created/updated guidance documents to improve training of their workforce and social worker teams and raise further awareness of the scheme.

21. One local authority confirmed they conduct ongoing awareness raising and training with social work staff to identify and respond to citizenship issues and the right to remain in the UK, with a focus on EU citizens. Alongside this, they have a service level agreement with a voluntary agency (KIND) to support their citizenship and immigration work with children and families.

Process Improvements:

22. Several local authorities reported undertaking further, manual, and extensive checks of all their records to assist with the identification of eligible cohorts and dedicated resource to complete this work. They performed retrospective checks, going back seven years, with one local authority identified sixteen additional children eligible to apply for EUSS.

23. The IMA has welcomed the positive engagement with each local authority in the West Midlands region, noting the collaboration with the Association of Directors of Children's Services (ADCS) and their Regional Leads in encouraging local authority engagement with this work. The IMA are aware of the operational pressure local authorities are under and are grateful for their assistance with this assurance review.

RAG Grading: local authority previous and revised gradings

Local Authority	Initial Local Authority Response (2024)			Individual Assurance Review Outcome (2025)		
	Identification	Record keeping	Retrospective checks	Identification	Record keeping	Retrospective checks
Birmingham						
City of Wolverhampton						
Coventry						
Dudley						
Herefordshire						
Sandwell						
Shropshire						
Solihull						
Staffordshire						
Stoke-on-Trent						
Telford & Wrekin						
Walsall						
Warwickshire						

Next Steps

24. Each local authority in the West Midlands has been notified of their re-grading following the conclusion of all individual assurance reviews along with a copy of their revised assessment.

25. Based on the information provided, the IMA does not at this stage consider that further compliance action is required by any local authority in the West Midlands in relation to this assurance review. The IMA will share our findings with key stakeholders for the purpose of knowledge sharing.

26. The IMA may contact any local authority in the future should we require further information, or if any subsequent issues arise regarding this review.