

Assurance Review (Looked after Children and Care Leavers) Annex 9a: South-West Final Regional Report October 2025

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

Table of contents

Introduction **.1**

Assurance Review findings **.1**

Improvements by local authorities **.3**

 System Improvements 3

 Policy Improvements 4

 Process Improvements 4

 RAG Grading: Local authority previous and revised gradings 5

Next Steps **.6**

Introduction

The Independent Monitoring Authority for the Citizens' Rights Agreements (IMA) has completed individual assurance reviews with all 15 local authorities in the South-West region of England.

Individual assurance reviews were conducted with local authorities who had not, during a previous information gathering exercise conducted in February 2023, 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 South-West region 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-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 because of this review and were keen to share these enhancements with the IMA. These are further outlined on pages three and four of this report.
5. The IMA notes that it experienced difficulty engaging with one local authority 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 subsequently 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 the engagement with the IMA, this local authority had a clearer understanding of their duties and updated their systems to improve their process and make it 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, 10 local authorities were able to identify and implement improvements before meeting with the IMA. These improvements are outlined further on pages three and four of this report.

8. Two local authorities confirmed they consulted an Independent Reviewing Officer (IRO), as part of their process, when reviewing cases and checking 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 314 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, that they had established a Data and Performance Team that oversee the management of all children in care and care leavers, this enabled reports to be run to identify all eligible cohorts who could apply for EUSS.
11. Six 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 to enable to record EUSS as a discrete datapoint and therefore allow for forward planning for the upgrade of EUSS and to record all required data.
13. One local authority confirmed that technical changes were made to their system to ensure pre-settled status and settled status are recorded on their system. They are also in the process of developing the fields to make it easier to clearly record the dates which are currently in case notes. This will allow 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 children and care leavers via a manual trawl to ensure their status was accurately recorded. This has ensured that all children and care leavers could be identified and applied in time for their correct status.
15. One local authority advised they have created a new report on their case management system based on the fields that were added to the identification screens. This enabled them to track and monitor all EUSS applications more efficiently and effectively.
16. One local authority reported that they have created a specialist team to work with UASC which will ensure they have identified/are identifying all non-EU and EEA EFTA children/care leavers who may be eligible to apply as family members of EU and EEA EFTA nationals.
17. One local authority reported that they have proactively updated their case management system and added a spreadsheet since the IMA conducted Phase 1 of this review to ensure all relevant data is captured for all children and young people entering their service. These updates have made reporting and retrospective checks easier and more accurate.
18. 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.
19. One local authority confirmed they intend to include a section on EUSS eligibility and the application process on their new Family Hub website, with signposting to the relevant documentation and information in relation to the support available for those eligible to apply.

Policy Improvements:

20. 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.

21. Several local authorities reported that they had delivered EUSS training to Social Workers, Family Support Workers and support staff, using their internal hubs to promote awareness.

22. 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.

23. One local authority confirmed they have put in place a clear policy which sets out the guidance and the process to be followed. This now ensures that all required information is recorded at the point of referral or assessment. This also sets the expectation that the status of application and need for support is reviewed in supervision, at any point of assessment, at any transfer point, when a child becomes looked after and at each statutory or pathway plan review until settled status is secured.

24. One local authority reported that their EUSS policy, process, and guidance document that they have created includes a recording template, setting out the required criteria as a minimum recording requirement. This will be recorded as an attachment to a case note so that it can easily be located within their case management system.

Process Improvements:

25. 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, resulting in many additional children being identified as eligible to apply for EUSS.

26. The IMA has welcomed the positive engagement with each local authority in the South-West 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
Bath and North-East Somerset						
Bournemouth, Christchurch & Poole						
City of Bristol						
Cornwall						
Devon						
Dorset						
Gloucestershire						
Isles of Scilly						
North Somerset						
Plymouth						
Somerset						
South Gloucestershire						
Swindon						
Torbay						
Wiltshire						

Next Steps

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

28. 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 South-West region in relation to this assurance review. The IMA will share our findings with key stakeholders for the purpose of knowledge sharing.

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