



For the Citizens'  
Rights Agreements

# **Assurance Review (Looked after Children and Care Leavers)**

## **Annex 8a: South-East Final Regional Report November 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

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The Independent Monitoring Authority for the Citizens' Rights Agreements (IMA) has completed individual assurance reviews with all 19 local authorities in the South-East 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-East 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 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 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 initially faced challenges engaging with one local authority in the region to gather further information. However, once meetings were arranged, the IMA provided additional support through emails, telephone calls, and MS Teams meetings to clarify queries. As a result, all local authorities fully engaged with the review process.

6. Where appropriate, the IMA shared best practice and guidance with local authorities. This helped to proactively review their processes, ensuring that nationality is recorded for all children and care leavers, and that key dates for upgrading from pre-settled to settled status are logged. As a result, six local authorities identified and implemented improvements ahead of their meetings with the IMA. These improvements are detailed on pages three and four of this report.

7. Three local authorities reported that, as part of their process, they involved an Independent Reviewing Officer (IRO) to review each case and assess potential EUSS eligibility. This added an extra layer of assurance for the IMA.

8. Following IMA engagement and improved processes for identifying, recording, and reviewing cases, an additional 150 looked after children and care leavers were identified as eligible for the EUSS and were subsequently supported through the application process.

# Improvements by local authorities

## **System Improvements:**

9. Five 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.
10. One local authority shared that, following engagement with the IMA, they began producing monthly reports on new cases involving EU and EEA EFTA children and young people. Each case is assigned a social worker to check whether an application has been made and to support completion if needed.
11. One local authority confirmed that they have added an EUSS classification on their case management recording system to help capture and track this information effectively.
12. One local authority reported that they created a form within their system to capture key data, recognising that this information should be easily accessible for all relevant children and young people and this will increase accuracy and improve their reporting processes.
13. One local authority reported that they have updated their case management process to include the additional categories set out in Home Office guidance, improving how this information is recorded across the service.
14. Following IMA engagement, one local authority confirmed they have introduced an EUSS notification form, based on IMA best practice. They also improved the immigration section in their case management system to better show the status and approval dates of EUSS applications, including any upgrades. These changes will enhance data reporting and reduce the need for manual checks.
15. One local authority confirmed they have updated their recording system to include EUSS statuses within the immigration section. This now captures when an application is made and when a child or care leaver becomes eligible to upgrade from pre-settled to settled status, allowing for more detailed tracking.
16. One local authority advised that they created a tracker to monitor the progress of children and families through the EUSS application process, including whether they have the necessary documentation. This allowed the local authority to review and manage EUSS applications more effectively and efficiently.
17. One local authority confirmed that when pre-settled status is granted, alerts have been added to their recording system to remind staff when settled status should be applied for. They also held additional training sessions for Children's Social Workers to support this process.
18. One local authority reported that since their last update to the IMA during 'phase 1', they have requested a change to their recording system so that when a child's nationality is entered, the parent's nationality becomes a mandatory field.

## **Policy Improvements:**

19. 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.
20. One local authority reported that they developed a guidance document to help staff understand their responsibilities on EUSS applications and to allow them to direct families to support where needed.
21. One local authority stated, following IMA engagement, that they had established a new process to check nationality of non-EU EEA EFTA children/young persons' family members, to see if that is an eligible route and provide support if required.
22. Several local authorities reported that they had delivered EUSS training to social workers and family support workers, using their internal hubs to promote awareness.
23. One local authority confirmed that they conduct monthly checks to identify any retrospective EUSS applications that may be needed. These are then followed up by a social worker. The monthly reports also include care leavers up to age 25.
24. Several local authorities have reported that they have created and updated guidance documents to improve training of their workforce and social worker teams and raise further awareness of the EUSS scheme.
25. One local authority confirmed that care leavers up to age 25 are tracked using a dedicated spreadsheet to monitor and identify any necessary EUSS applications. They have also requested an update to their performance reporting system to allow tracking of EUSS status, which would make identifying eligible citizens easier.

## **Process Improvements:**

26. 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.
27. The IMA has welcomed the positive engagement with each local authority in the South-East region, noting the collaboration with the Association of Directors of Childrens 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
Bracknell Forest	Amber	Amber	Amber	Green	Green	Green
Brighton and Hove	Amber	Amber	Amber	Green	Green	Green
Buckinghamshire	Amber	Amber	Amber	Green	Green	Green
East Sussex	Amber	Amber	Amber	Green	Green	Green
Hampshire	Amber	Red	Amber	Green	Green	Green
Isle of Wight	Amber	Red	Amber	Green	Green	Green
Kent	Amber	Amber	Amber	Green	Green	Green
Medway	Red	Amber	Red	Green	Green	Green
Milton Keynes	Red	Red	Red	Green	Green	Green
Oxfordshire	Red	Amber	Red	Green	Green	Green
Portsmouth	Red	Red	Red	Green	Green	Green
Reading	Amber	Green	Amber	Green	Green	Green
Slough	Amber	Amber	Amber	Green	Green	Green
Southampton	Amber	Amber	Amber	Green	Green	Green
Surrey	Amber	Amber	Amber	Green	Green	Green
West Berkshire	Amber	Amber	Amber	Green	Green	Green
West Sussex	Amber	Amber	Amber	Green	Green	Green
Windsor & Maidenhead	Amber	Amber	Amber	Green	Green	Green
Wokingham	Red	Amber	Red	Green	Green	Green

# Next Steps

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28. Each local authority in the South-East region has been notified of their re-grading following the conclusion of all individual assurance reviews along with a copy of their revised assessment.
29. 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-East region in relation to this assurance review. The IMA will share our findings with key stakeholders for the purpose of knowledge sharing.
30. The IMA may contact any local authority in the future should we require further information, or if any subsequent issues arise regarding this review.