



For the Citizens'
Rights Agreements

Assurance Review (Looked after Children and Care Leavers) Annex 10a: London Final Regional Report March 2026

**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 33 local authorities in the London region.

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 London 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 four, five and six of this report.

5. The IMA initially faced challenges engaging with four local authorities 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. Nine local authorities reported that, as part of their process, they involve 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 407 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. Eight local authorities confirmed they had made technical updates to their case management systems. These updates ensure that nationality, ethnicity, and immigration status are recorded in accordance with Home Office guidance.
10. One local authority reported that, following engagement with the IMA, they updated their case management system to capture nationality and immigration status, including any associated expiry dates. This ensured the appropriate statuses are recorded in line with the Home Office guidance.
11. One local authority confirmed that they have appointed an On-Site Immigration Official (OSIO) within the Leaving Care Team to provide support and guidance, and to manage any necessary escalations. This ensures all eligible children and young people receive appropriate advice and support from their corporate parents.
12. One local authority reported that, following engagement with the IMA, they reviewed their data and performance monitoring, and they found that the available data was insufficient to answer key questions, prompting a system redesign. The new system now includes mandatory fields, such as Nationality and Status to enable accurate recording and reporting of information.
13. One local authority reported that their recording system has been enhanced to include a dedicated tab for EUSS application updates, complementing their newly developed dashboard for Nationality, Immigration, and EUSS Status. This dashboard enables the service to monitor this cohort of children and young people more effectively, ensuring timely identification and support. During the review, case files were manually updated to reflect status in line with new guidance while system changes and the dashboard were being designed and implemented.
14. Following engagement with the IMA, one local authority confirmed that all children in care now have a nationality identifier recorded on their case file. Additionally, all aspects of their immigration status and eligibility are tracked and, where possible, resolved before they turn 18 as part of their care plan.
15. One local authority confirmed that they have enhanced their case management system by adding a section to record parents' or carers' nationality. This improvement will support the identification of all eligible children and young people, family members and enable accurate reporting on the non-EU EEA EFTA cohort.
16. One local authority advised that they have added a new section to their case management system to indicate whether a child or young person may be eligible for EUSS through a family member.
17. One local authority confirmed that their Business Support Team has developed a tracker spreadsheet to record immigration status expiry dates (including pre-settled status) for looked-after children and care leavers, including older care leavers who no longer have an allocated worker.

Policy Improvements:

18. Three 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. One local authority reported that they have added an EUSS section to their Pathway Plan, Looked After Children care plan, and Children in Need plan. This ensures that all required information is captured in one place and can be regularly monitored and reviewed for every child and young person during scheduled meetings.

20. Following engagement with the IMA, one local authority stated that they worked with their IT and Intelligence Teams to create an alert system that notifies them whenever a child or young person becomes eligible to convert their pre-settled status to settled. This ensured that status was updated and the appropriate time, securing rights for this cohort.

21. Several local authorities reported that they had delivered specific EUSS training to social workers and family support workers, 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 that care leavers up to age 25 are tracked using a dedicated spreadsheet to monitor and identify any necessary EUSS applications.

Process Improvements:

24. 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 and subsequently supported.

25. The IMA has welcomed the positive engagement with each local authority in the London 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
Barking and Dagenham	Red	Red	Red	Green	Green	Green
Barnet	Orange	Orange	Orange	Green	Green	Green
Bexley	Orange	Orange	Orange	Green	Green	Green
Brent	Orange	Orange	Orange	Green	Green	Green
Bromley	Red	Red	Red	Green	Green	Green
Camden	Orange	Green	Orange	Green	Green	Green
City of London	Red	Orange	Red	Green	Green	Green
Croydon	Red	Orange	Red	Green	Green	Green
Ealing	Red	Red	Red	Green	Green	Green
Enfield	Orange	Orange	Orange	Green	Green	Green
Hackney	Orange	Orange	Orange	Green	Green	Green
Hammersmith and Fulham	Red	Orange	Red	Green	Green	Green
Haringey	Red	Orange	Red	Green	Green	Green
Harrow	Orange	Orange	Orange	Green	Green	Green
Havering	Red	Orange	Red	Green	Green	Green
Hillingdon	Orange	Orange	Orange	Green	Green	Green
Hounslow	Red	Red	Red	Green	Green	Green
Islington	Red	Red	Red	Green	Green	Green
Lambeth	Red	Red	Red	Green	Green	Green
Lewisham	Red	Orange	Red	Green	Green	Green

Local Authority	Initial Local Authority Response (2024)			Individual Assurance Review Outcome (2025)		
	Identification	Record keeping	Retrospective checks	Identification	Record keeping	Retrospective checks
Merton	Orange	Orange	Orange	Green	Green	Green
Newham	Red	Orange	Red	Green	Green	Green
Redbridge	Orange	Orange	Orange	Green	Green	Green
Richmond upon Thames	Orange	Orange	Orange	Green	Green	Green
Royal Borough of Greenwich	Red	Red	Red	Green	Green	Green
Royal Borough of Kensington & Chelsea	Orange	Orange	Red	Green	Green	Green
Royal Borough of Kingston upon Thames	Orange	Orange	Orange	Green	Green	Green
Southwark	Orange	Orange	Orange	Green	Green	Green
Sutton	Orange	Orange	Orange	Green	Green	Green
Tower Hamlets	Orange	Orange	Orange	Green	Green	Green
Waltham Forest	Orange	Orange	Orange	Green	Green	Green
Wandsworth	Orange	Orange	Orange	Green	Green	Green
Westminster	Red	Orange	Red	Green	Green	Green

Next Steps

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

27. 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 London region in relation to this assurance review. The IMA will share our findings with key stakeholders for the purpose of knowledge sharing.

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