



For the Citizens'
Rights Agreements

Assurance Review (Looked after Children and Care Leavers) Annex 11a: Scotland Final Regional Report July 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 32 local authorities in the Scotland 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.

Scope and applicability of Home Office guidance in Scotland

Throughout the IMA's assurance review work in England and Wales, the Home Office's EU Settlement Scheme: looked-after children and care leavers guidance to local authorities, published on 5 December 2024, was used as an important reference point when considering how local authorities were discharging their responsibility to identify and support eligible looked after children, care leavers, or their family members to apply to the EUSS.

However, the IMA recognises that this guidance, and the relevant case law underpinning it, does not apply directly in Scotland. As such, its effect in Scotland is limited to the extent that individual Scottish local authorities choose to adopt or mirror the approach set out in that guidance. The IMA has therefore taken this distinction into account when conducting assurance reviews with Scottish local authorities.

The IMA's review of Scottish local authorities has focused on whether each authority could demonstrate that it had effective and reliable processes in place to identify eligible looked after children, care leavers and relevant family members, maintain accurate records, and complete retrospective checks. Retrospective checks here refer to a local authority checking historical records to identify any eligible children or care leavers who they have a responsibility to support in making an EUSS application where they are up to the age of 25 and may have left care up to seven years ago.

Where appropriate, the IMA has shared best practice and relevant guidance to local authorities in Scotland to support the approach taken in these assurance reviews, while also recognising the extent to which it applies.

Assurance Review findings

1. The IMA is assured that all local authorities except one in the Scotland 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 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 difficulties in obtaining engagement from five local authorities in the region during its efforts to gather supplementary information. After meetings were arranged, the IMA provided comprehensive follow up support, through email correspondence, telephone discussions and MS Teams meetings, to clarify outstanding matters. Consequently, all local authorities, with the exception of one, demonstrated full engagement with the review process.
6. One local authority has encountered difficulties in implementing an appropriate process. The IMA has provided best practice guidance and will continue to offer support. However, due to limited engagement, the IMA was unable to gain assurance that the authority has robust procedures in place to identify eligible looked after children, care leavers, and their family members. As a result, the authority could not be re-graded at this time, and ongoing support from the IMA will continue.
7. Where appropriate, the IMA shared best practice and guidance with local authorities. This helped them proactively review their processes, ensuring 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, fifteen 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.
8. Five 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.
9. Following IMA engagement and improved processes for identifying, recording, and reviewing cases, an additional 44 looked after children and care leavers were identified as eligible to apply for the EUSS and were subsequently supported through the application process.

Improvements by local authorities

System Improvements:

10. Twelve local authorities confirmed they had made technical updates to their case management systems. These updates ensure that nationality, ethnicity, and immigration status are recorded correctly.
11. One local authority advised that it has implemented a structured four monthly data monitoring process within its case management system. As part of this arrangement, team managers from all Children and Families Teams, together with the Through Care and After Care Team, are issued with an updated extract listing all children and young people allocated to their teams who hold an EUSS status. Managers are required to review the accuracy of this information, report any changes to EUSS or citizenship status, and confirm whether any newly identified children or young people, who may be eligible for the EUSS, have been identified since the previous review.
12. One local authority reported that it had commissioned its IT Department to enhance the case management system by introducing a specific recording and alert mechanism. This functionality is intended to ensure that all non EU EEA and EFTA Looked After Children and Care Leavers who may be eligible to apply to the EUSS via an EU, EEA or EFTA family member can be accurately identified and monitored.
13. One local authority advised that, further to engagement with the IMA, each team has been asked to nominate at least one representative to attend the EUSS training facilitated by the EUSS Vulnerability Team. The authority is also exploring suitable locations within the client database to record immigration status, details of support provided, and the progress of EUSS applications. Pending this system enhancement, a dedicated spreadsheet has been introduced to collate all required information.
14. One local authority indicated that it has established a centralised tracking sheet, accompanied by a clearly identified single point of contact, to strengthen coordination and provide robust oversight of service activity.
15. Following engagement with the IMA, one local authority confirmed that they routinely record all pertinent information for their Unaccompanied Asylum-Seeking Children through their KIU number. While this practice had not been applied systematically to EUSS related cases, procedures have now been established to ensure that such information is captured consistently.
16. Following engagement with the IMA, one local authority advised that it has initiated improvement activity aimed at embedding immigration status and nationality as standard demographic fields within its recording system. This development is intended to facilitate more efficient and reliable identification of immigration status going forward. To support implementation, the authority has produced a Local Information System Guide outlining the process for entering nationality and immigration status data.
17. One local authority reported that, as an element of its wider digital transformation work, it is in the process of migrating to the Mosaic case management system. This transition is expected to strengthen the reliability and consistency of data recording. The capabilities within Mosaic will allow for more efficient collation and monitoring of EUSS related information, thereby supporting timely decision making and enhanced operational oversight.

18. One local authority reported that it is currently developing a new case management system and intends to include all necessary data fields, such as nationality, parental nationality, immigration status, and the date on which an individual's pre settled status can be converted to settled status.

19. One local authority indicated that it has implemented a new recording system. Liquidlogic provides functionality for electronically recording country of origin and nationality, and the authority is planning to enhance this further by adding a drop down field specifically for settled and pre settled status.

Policy Improvements:

20. 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 looked after children and care leavers would be identified and retrospective checks conducted to make sure none had been previously missed.

21. One local authority indicated that it has produced a dedicated practice guide to strengthen the procedures for identification and recording. The guide is scheduled for rollout to all social work teams, ensuring that all eligible looked after children, young people and care leavers are systematically identified and their information recorded accurately.

22. Several local authorities reported that they had delivered dedicated EUSS training to social workers and family support practitioners, utilising internal systems to support and promote awareness.

23. Several local authorities have reported that although they currently have no formal written process currently in existence, the information supplied by the IMA will be used to develop staff guidance to support the future identification of eligible looked after children and care leavers.

24. One local authority reported that, alongside existing looked after children and children in need procedures, a targeted communications strategy has been established to disseminate EUSS specific information. As part of this approach, the authority attends EUSS workshops and ensures that relevant training opportunities are highlighted to managers and frontline practitioners. Additionally, workshop slides, supporting resources and updates are routinely shared across the workforce to reinforce awareness and understanding.

Process Improvements:

25. Several local authorities indicated that they had conducted further extensive manual checks across all relevant records, supported by dedicated staffing, to strengthen the identification of eligible cohorts. This retrospective review, spanning seven years of case data, led to the identification of numerous additional children who were eligible to apply for the EUSS and who have since been provided with appropriate support.

26. The IMA has welcomed the positive engagement with local authorities in the Scotland region, noting the collaboration with the Convention of Scottish Local Authorities (COSLA) 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
Aberdeenshire						
Aberdeen City						
Angus						
Argyll and Bute						
Clackmannanshire						
Dumfries and Galloway						
Dundee City						
East Ayrshire						
East Dunbartonshire						
East Lothian						
East Renfrewshire						
Edinburgh City						
Falkirk						
Fife						
Glasgow City						
Highland						
Inverclyde						
Midlothian						
Moray						
North Ayrshire						

Local Authority	Initial Local Authority Response (2024)			Individual Assurance Review Outcome (2025)		
	Identification	Record keeping	Retrospective checks	Identification	Record keeping	Retrospective checks
North Lanarkshire						
Orkney Islands						
Perth and Kinross						
Renfrewshire						
Scottish Borders						
Shetland Islands						
South Ayrshire						
South Lanarkshire						
Stirling						
West Dunbartonshire						
West Lothian						
Western Isles						

Next Steps

27. Thirty-one of the local authorities in the Scotland 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 Scotland region in relation to this assurance review and we will continue to offer support to Glasgow City Council. 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.