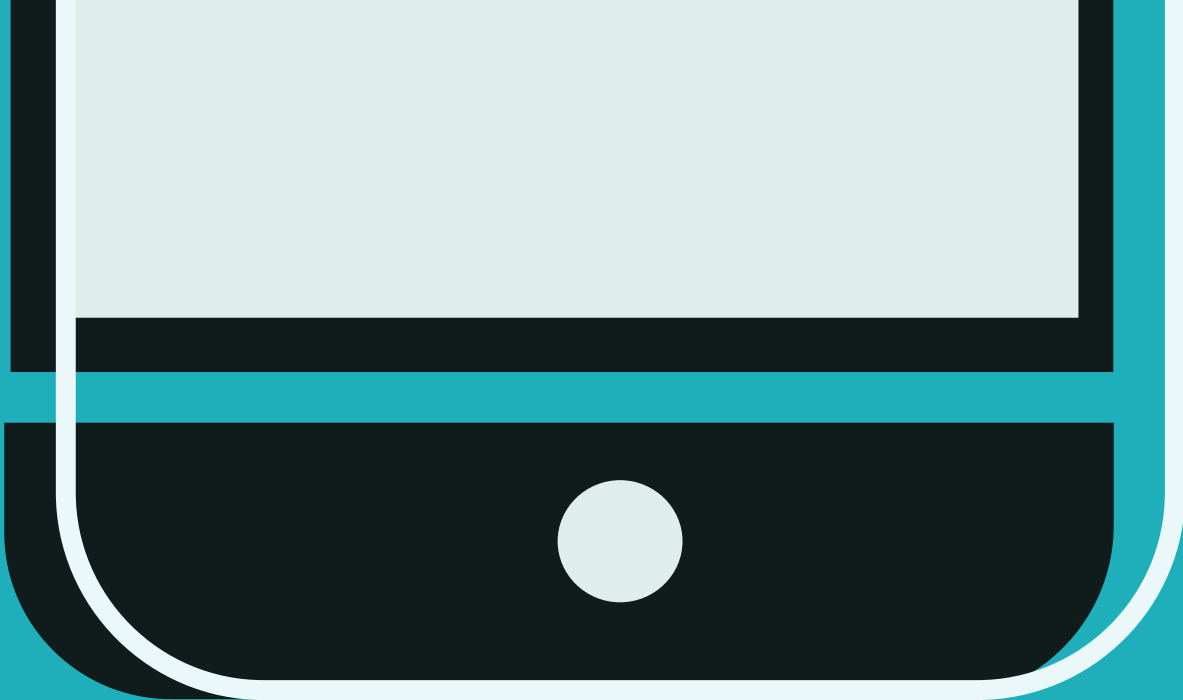


DIGITAL STATUS

HANDLE WITH CARE

A report on the experience of vulnerable EU communities accessing the EU Settlement Scheme, the government's brand new digital immigration status for EU citizens living in the UK



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A special thanks to

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November 2020

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Executive summary

The wholly digital nature of the Government's EU Settlement Scheme ('EUSS' or 'the Scheme') is the first of its kind and is challenging for many EU citizens, particularly the vulnerable, living in the United Kingdom.

- These challenges include the lack of necessary skills and technology for digital engagement and usage. Regardless of their age and socio-economic background, many applicants require support from a community organisation or family member to apply.
- No support has been given to prepare EU citizens or the community organisations on which they rely, in using the digital system which is the EUSS.
- The Home Office assumes, incorrectly, that existing EU citizens, often of long standing residence, tax payers and contributors to the economy, are fully aware of the need to apply and in possession of the right tools to make use of this new application process.
- Within a 5-year time frame, more than 1.7 million EU citizens and their family members with Pre-settled status will have to reapply to the EUSS to upgrade to Settled status. Failure to do so may expose them to the risk of being subject to the 'hostile environment' and liable for detention and deportation, as well as losing their entitlements and being unable to legally rent, work or access essential support and services in the UK.
- This digital status undermines the autonomy of individuals, creating situations of dependency. This also means that without the necessary support, many EU citizens will not be able to prove their status, access benefits and other entitlements it affords. In general, regardless of their age and digital literacy, status holders have issues accessing their status.
- COVID-19 has disrupted and limited outreach and advice services supporting Europeans to apply to the EUSS ahead of the end of free movement and yet the deadline to apply (30 June 2021) has not been extended.

Recommendations

In order to overcome the problems related to the Scheme, within the challenging context of the Covid-19 pandemic, the following recommendations are proposed.

1

Extending the 30 June 2021 deadline, at least to 30 June 2022, to ensure that people, especially the most vulnerable, who have been isolated during lockdown and experienced the closure or limitation of support services available, will receive help with their application.

2

Extending the option to use paper application forms for a wider number of cases, in order to make sure that everyone has fair and equal access to the process.

3

Implementing the issue of a physical document proving the status, especially for vulnerable applicants. This would ensure that everyone has access to their status and are able to prove it to others. It would also ensure that Pre-settled status holders do not miss the expiry date of their status and upgrade to settled status.

4

Including the date of arrival in the UK into the application process. This would ensure that a timely reminder to upgrade to Settled status is sent when a person becomes eligible.

5

Creating a free and official App to improve access to the status, to manage and share it easily with others.

6

Simplifying access to the existing Gov.uk website.

7

Ensuring long term support and promotion of the EUSS by continuing to fund the community and voluntary sector, the continuation of the EU Resolution Centre and the 'Assisted Digital' service for vulnerable people.

8

Improving the Home Office's technical and digital EUSS support by including community languages to improve access and support to vulnerable people.

Foreword

by Tamara Flanagan OBE
Head of Projects, New Europeans UK

The EUSS is the UK government's first fully digital immigration system introduced to regularise the rights of EU citizens and their family members residing in the UK once the country leaves the EU.

It is generally agreed that the application process is easier than other existing Home Office applications. It is free to apply and only three checks are conducted on each applicant: identity, residency and criminality.

The Home Office highlights the EUSS as being more secure and less exposed to fraud and exploitation, declaring that "moving to a digital status is a step forward in tackling those who seek to control others", and that digital status is "easier to use for visually impaired users, who may have difficulty reading a physical document".¹

However, its introduction comes in the wake of episodes of serious system deficiencies from the Home Office, such as the Windrush generation scandal. Indeed, there are concerns that these episodes indicate that the Home Office will struggle in managing a wholly digital status going forward.²

The present research was conducted on a group of over 260 people of all ages from the Italian and the Roma communities.

What is the EU Settlement Scheme?

The EU Settlement Scheme has been introduced by the Home Office as a consequence of the UK leaving the European Union and ending free movement (more commonly known as 'Brexit').

The aim is to safeguard the rights of EEA (EU countries, Iceland, Liechtenstein and Norway) and Swiss nationals, and their family members of any nationality, residing in the UK. Applying to EUSS is mandatory for those who wish to remain in the UK after Brexit (it is voluntary only for Irish nationals).

In order to be eligible to apply, the EU citizen must have started to reside in the UK by 31 December 2020, and the deadline to apply is 30 June 2021.

If eligible, Settled Status (indefinite leave to remain) or Pre-Settled Status (limited leave to remain) will be granted by the Home Office. Those with Pre-settled status can then apply for Settled status after 5 years of continuous residence (it will not be granted automatically).

Between its introduction and the end of October 2020, more than 4.2 million applications have been made to the EUSS, of which more than 4 million applications were concluded.

55% (2,249,800) were granted Settled status and 42% (1,711,600) were granted Pre-settled status. 3% were refused, withdrawn, or invalid.

In June 2020, the highest number of applications received were from Polish citizens (718,620), Romanian (609,060), and Italian (372,380).

[1] See MP Patrick Grady's questions to Home Office (last accessed 29 October 2020).

[2] See the Public Law Project, "Digital Immigration Status: A monitoring Framework" (last accessed 29 October 2020).

Awareness on digital status: the importance of community groups

1.1 Accessing information, where (digital) exclusion starts

In order for EU nationals and their family members to apply for the EUSS, they need (a) to be aware of the Scheme, (b) to know that they are eligible, and (c) that they are legally required, to apply.

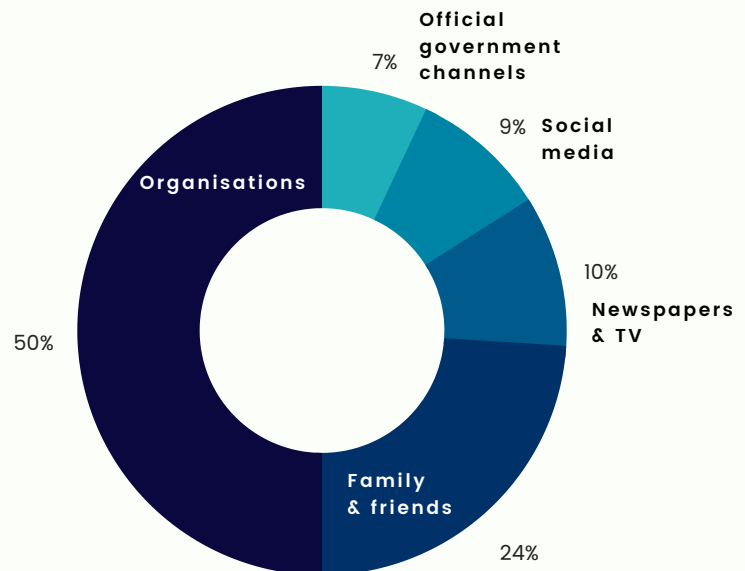
There is the concern that significant numbers of EU citizens – especially the vulnerable – living in the UK are not aware and will miss the deadline to apply (30 June 2021).

This research highlights the important role community organisations play in ensuring awareness of the Scheme. People without good social or community networks lack opportunities to find out about the EUSS and apply. The work carried out by community organisations has been, and will continue to be, essential.

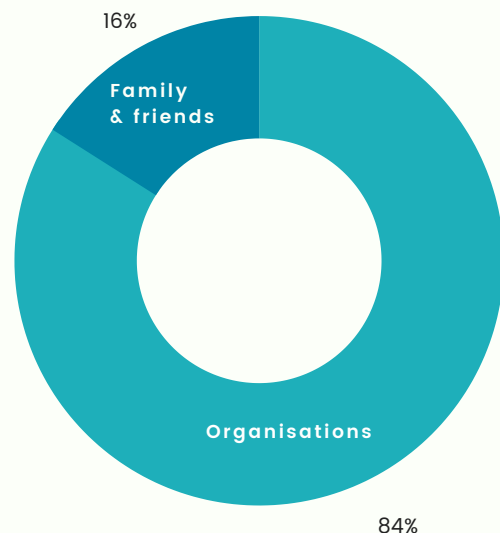
The majority of our respondents knew that such a Scheme exists, but had no further details. Very few learnt about the Scheme by checking official Government channels, newspapers, TV or social media. Instead, many of our respondents became aware of the Scheme and the requirement to apply from community organisations, or from family and friends.

Crucially, we found that 38% of our respondents had to access information in another language other than English to make their application and understand their status. Community organisations provided that essential information and support in their native language,

How people learnt about EUSS



Where people received support for their EUSS application



Almost 35% of our respondents have been in the UK for more than 30 years, some for more than 60 years. Awareness of the Scheme for older people is influenced by a number of factors, including degenerative ageing conditions, disability, or reduced autonomy.

Not only may they be isolated, with low digital literacy, but also they might not believe that the 'migrant' label applies to them because they are long term residents in the UK. After all, their long residency means they have already been tax payers and contributors to the UK economy and the community. In this respect, the Italian Consulate has calculated that over 30.000 Italians over 65 living in the UK still need to apply to the Scheme.

Similar barriers to knowing about the Scheme apply to members of the Roma community. None of our Roma respondents learnt about the EUSS through official Government channels or social media, relying instead on family and friends, places of work, and news from their countries of origin. This means that correct and current information about the EUSS cannot be guaranteed. Additional barriers such as proficiency in English, low literacy levels, and long working hours also exist for this group.³

1.2 The application process, where (digital) exclusion continues

In order to start their application to the Scheme, applicants are required to download an App onto a smartphone, scan their biometric passport and take a picture of themselves, and then complete the application online. Paper application forms are available in limited cases, but the system is created to be used online.

Applicants also need to be in possession of the necessary documentation including a valid passport, national identity card, or biometric residence card, as well as evidence of residence in the UK.

The App's technical limitations and the online system are a barrier for those who have a basic IT literacy.⁴ Developed by the Home Office to conduct an identity check, the App is only compatible with recent smartphones. It follows that those without a smartphone (or with older models) have to rely on someone else's phone. If this is not possible, applicants are required either to send their passport or ID card via post, or to scan the passport at scanning location.⁵

Although the application is supposed to be free, the scanning service is provided for a fee of £14. In addition to this, applicants may also incur travel costs to access the service.

Furthermore, not only does the application process rely on a compatible smartphone and an email, but also subsequent communication from the Home Office is made via email. However, this research revealed that our cohort have limited access to or ownership of an email address or a computer across all ages, and low level of digital literacy.

Notwithstanding the age breakdown, we found that the vast majority of respondents had required help to make the application (and will need help to manage their status hereafter).

The application process is, therefore, inaccessible for all the above reasons, due to its entirely digital nature.

Organisations made up the largest source of help, followed by relatives and friends. No one used a lawyer to make their application.

[3] See Roma Support Group (RSG), "Brexit, EU Settlement Scheme and the Roma communities in the UK", June 2020. (last accessed 20 October 2020).

[4] See Migrant Voice, "Unsettling. A report on the experiences of EEA nationals and their families in the EU Settlement Scheme", November 2019. (last accessed 20 October 2020).

[5] The closure of these services due to the Covid-19 emergency have prolonged the process for those applicants who need to use the scanning services, in some cases preventing the application.

80%

The amount of people of all ages that needed support with their EUSS application.

68%

The amount of people that do not know how to prove their status.

73%

The amount of people with Pre-settled Status who do not know when and how to apply for Settled Status.

54%

The amount of people over 65 years old without their own smartphone, email address and / or computer.

09 1.3 Documentation and burden of proof

A further complication lies in the burden of proof, which can be significantly disproportionate for vulnerable applicants.

48% of our respondents, of all ages and regardless of occupation, were required to provide additional evidence to prove residence in the UK.

Half of the respondents from the Italian community, over 65 and resident in the UK for more than 30 years, had to submit additional evidence to prove their continuous residence in the UK when applying. One reason for this may be that the automatic check using tax records only goes back 7 years.

If individuals do not already have access to documents at home, and are not familiar with technology, it is more difficult to source them. Apart from the sense of distress that the request for additional evidence entails, older people often have problems accessing documents as they might not be able to use online banking, and would need to visit the bank to request their bank statements.

Whilst the EUSS application allows an applicant to add their maiden and married name, the process of finding evidence with the correct name displayed may be challenging. This is especially pertinent for Italian women who often take their husband's surname, whilst their passport carries their maiden name.

In addition, household bills such as Council tax or utility bills, may not be in the applicants' name which creates additional challenges in proving residence in the UK if additional evidence has been requested.


The majority of people without valid or biometric ID are represented by older Roma people and women. In some cases mothers will be named on child benefit or tax credit awards which can be used as additional evidence but this alternative is not easily known.

As reported by the Roma Support Group, a significant number of Roma people, including children born in the UK, had no valid IDs. As a result, they were unable to submit their EUSS applications. In addition, many Roma (especially Romanian Roma) have only national IDs, which are required by the EUSS application process to be sent to the Home Office for verification. There is a reluctance to do this, coupled with the concern for a delay in it being returned by the Home Office.


The difficulties in finding evidence to support continuous residence in the UK often means that applicants are willing to accept Pre-settled, instead of Settled status, despite living in the UK for more than five years. This is especially true for Roma women, who are more likely to face difficulties in proving five years of continuous residence.⁶

Some respondents commented that although the process was clearly explained by the caseworker, it was difficult finding all the necessary documents. Those who described it as an easy process also stressed that this was due to the help of the organisation, again highlighting the fundamental role community organisations play in supporting access to the Scheme.

[6] RSG, "Brexit, EU Settlement Scheme and the Roma communities in the UK" (June 2020).

A photograph of an elderly man with short, light-colored hair, wearing a dark, textured sweater. He is sitting at a wooden table in what appears to be a cafe or restaurant, looking out a window. On the table in front of him is a dark coffee cup on a saucer and a clear glass. The background shows a bright window with some greenery outside.

Mr D had scheduled an appointment to receive support for his Settled Status application, which was cancelled due to the Covid-19 emergency. He only has a landline phone, he does not own a smartphone or computer. He lives alone and has no family. He currently cannot receive help with his application.

A photograph of an elderly man and a woman sitting on a wooden park bench. The man is on the left, wearing a light-colored jacket and a brown cap. The woman is on the right, wearing a blue hoodie. They are both looking away from the camera towards a grassy area with trees in the background.

Mr R and Mrs B are Italian citizens of 82 and 84 years old respectively. They are married. They have been living, and working in the UK for more than 60 years. They retired more than 10 years ago and receive a pension. They were asked for more evidence to prove their continuous residence in the UK. We were able to provide Council tax and utility bills for Mr R, as they were exclusively in his name. As she does not have online banking, Mrs B had to go to her bank's branch and ask for 5 years of bank statements. She received a packet of monthly statements that we had to scan and upload on the system.

Upgrading the digital status: future challenges

2.1 Moving from Pre-settled to Settled status

Pre-settled status should ensure the right to travel in and out of the UK, to work and study in the UK, access the NHS, as well as the eligibility for support from public funds. It is known that there are concerns amongst those with this status of not being able to access services and support (such as NHS or welfare benefits), especially as this status does not count as 'right to reside' for the purpose of benefits.

In addition, our research highlighted that applicants did not always understand what their status was, or what the eligibility criteria were, particularly due to its digital nature.

As a matter of fact, 12% of our respondents do not know if they have received the right status.

A further issue identified in our research is the transition from Pre-settled to Settled status. A significant majority of our respondents with Pre-settled status do not know how, and when, to apply to Settled status.

Generally, there is a lack of knowledge regarding this transition, as the process is unclear and abstract, as well as potentially difficult to perform.

In particular, as with the problems addressed in the previous chapter, in order to upgrade to Settled status, applicants will need to:

- Understand the difference between Pre-settled and Settled status.
- Be aware that they need to re-apply and are eligible.
- Know when their status expires.
- Have access to their digital status.

- Be able to navigate the system.
- Have access to the internet and some digital literacy, or be supported by someone.
- Have the documents to prove their continuous residence in the UK and to be able to justify any absence longer than 6 months (e.g. related to Covid-19, childbirth, illness and study abroad).

58%

The amount of people who rely on someone else, or simply do not know, who is 'looking after' their digital status.

Within a 5-year time frame, more than 1.7 million EU citizens and their family members with Pre-settled status⁷ will have to re-apply for Settled status. If applicants do not successfully "upgrade" their status, they risk becoming undocumented, and lose access to benefits, healthcare, the right to work, or to rent a property. The risk of becoming undocumented sits within the administrative and legislative Hostile Environment policy measures conceived by the UK Government.

[7] The Home Office counted that as of 30 September 2020, 1,614,600 pre-settled status applications were successful.

Whilst the Home Office confirms that a reminder will be sent to individuals to upgrade to Settled status before their Pre-settled status expires,⁸ this action does not take into account the challenges such as potential lack of access to the status, or to the required tools.

Currently, it is not possible to state the date of first arrival in the UK in the application process, which means the length of residence in the UK is not a factor included in the status. A reminder to upgrade from Pre-settled to Settled status is activated by the date when Pre-settled status is confirmed, and not by the date when the required 5 years of continuous residence, since the first arrival, have been achieved. Indeed, there is not a fixed or single deadline for people to re-apply for Settled status.

As a result, an individual could be eligible to 'upgrade' before their Pre-settled status expires (in some cases, years before). This means that people may hold Pre-settled status - a 'weaker' form of protection - for much longer than necessary.

In addition, those who apply for Pre-settled status as soon as they arrive in the UK will only have a short period of time between the expiry date of their status, and the date on which they become eligible to apply for Settled status, even if a grace period applies.

2.2 Accessing the digital status

Our research highlights the risk for those who do not upgrade from Pre-settled to Settled status of becoming undocumented because of a lack of confidence and technology to access their digital status.

Whilst the majority of respondents with Pre-settled status have either a smartphone, a computer, or an email address, 15% do not own any of these.

A consistent minority of respondents do not have the digital knowledge or confidence, nor the technology to upgrade their status, and are reliant on someone else to manage their status for them.

The majority of Pre-settled status holders who answered that they do not have a phone, also stated either that they are 'looking after' the status themselves or that they were not sure who will 'look after' their status. This means that this group has a higher chance of missing the deadline.

Whilst there are those who see the need to upgrade from Pre-settled to Settled status, but lack the technology to do so, several respondents who own a smartphone, computer or email address, and are managing their own status, would still need help to log in.

In conclusion, Pre-settled status holders may miss the deadline to upgrade to Settled status for various reasons, often related to the difficulties in managing the status.

2.3 Proving 'continuous residence' for Settled status

47% of our research cohort with pre-settled status were asked to provide additional evidence of their residence in the UK when applying. It follows that the challenge in providing evidence of their residence in the UK or justifying absences from the UK, will still be the case when they apply to upgrade to Settled status.

[8] See Home Office, "EU Settlement Scheme: statement of intent", June 2019 (last accessed 29 October 2020).

13 In addition, respondents who had received the wrong status because they could not provide evidence for their residence in the UK may encounter the same issue when applying for Settled status.

Our respondents mostly described the process of submitting evidence as difficult, time-consuming and unclear. It was only described as easy when the applicant had received support from an organisation.

CASE STUDIES

Ms A applied to the Scheme with the help of an 'accountant'. She came to us to check if she had obtained her status as she had not received a response to her application. The 'accountant' had used his email and Ms A's phone number. She had lost the phone and had since changed her number. Not having access to the phone number nor the email made it impossible to access her status or change the log in details, as one of the two had to be accessible. She had not heard from the 'accountant' and so she was not aware whether she applied for Pre-settled or Settled status, and was not able to access her status. Her child needed to apply as well and was affected by the lack of information, ways to access the Scheme and her mother's application.

Before starting the application, we asked Mr T if he had an email address and phone number. He replied that he only had a landline, but he had an email address. However, he thought that "email address" meant home address. We managed to reach a nephew-in-law who was willing to help. This relative will now always need to be present, or at least ready to check his phone, if Mr T ever needs to access his online status and prove his status to others.



Managing the digital status: updating and proving the new immigration status

3.1 Lack of digital access and digital means

As addressed in the previous chapter, many of our respondents depended on the essential help of a relative or a friend, with the use of their phone number or email address, and with using technology to make their EUSS application. Consequently, they will also be dependent on others to manage their online status going forward.

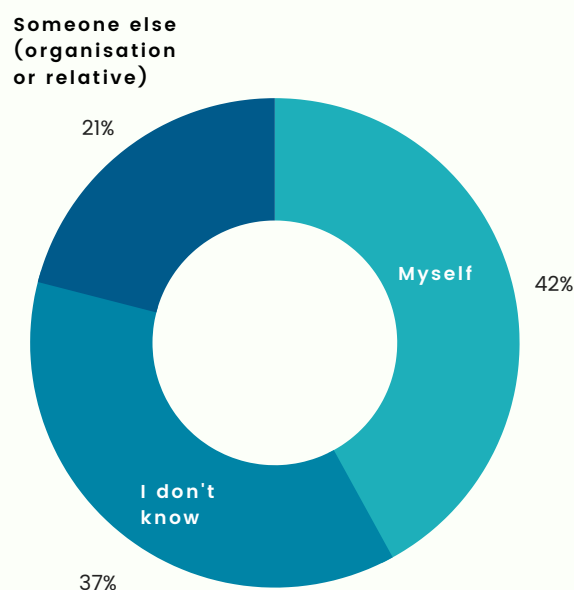
More than half of respondents over 65 replied that they do not have a smartphone, a computer and/or an email address. However, having those skills and tools does not mean that a person is able to manage their status independently. The majority of our respondents replied that they stated that they would not be able to update their online details, or view their status independently. In particular, 68% stated that they would not know how to prove their status if asked by an employer, doctor or landlord to do so.

There is the risk that in receiving help from a third-party to access their online status, they would not know, or have access to, the email address or phone number used. Indeed, if they know these details, they would still be dependent on someone else to check that phone number or email address when proving their status to others.

Support can be currently obtained by the EUSS Resolution Centre and the 'Assisted Digital' service, although only in English. In addition, there is no certainty about the future of the EU Resolution Centre in after the deadline of 30th June to apply, or whether a successor service will be created.

As a result, it is likely that the work will fall to community organisations. However, there is evidence that these organisations do not have the necessary resources in place to manage this support and the increase in need.⁹

Who is taking care of your status?



3.2 Using the digital status

This sections focuses on the process of maintaining a digital status, once granted. Maintenance involves updating personal information, such as new passport number, residential address or email address, and the requirement to 'share' it with others such as a potential employers, landlords or healthcare professionals. As a result, not keeping a status up to date, or not being able to 'share' it with others will mean that proving eligibility for services, benefits and the right to work and live in the UK will not be possible.

[9] See RSG, "Statement on the impact of EU Settlement Scheme digital-only status on the Roma Community in the UK" (last accessed 29 October 2020).

15 In order to highlight the challenges for vulnerable people such as our two cohorts in managing their status, the table below outlines the steps required to access a digital status.

How to access your digital status:

1. Open a browser, search and open the correct page on the Gov.uk website (there is not a specific App or section for accessing the status).
2. Select the identity document used for the application and insert the details (if the document has been replaced, the status holder will need to access with the previous document number).
3. Next, the status holder will need to enter the phone number or email address used for the application. A security code will be sent to confirm their identity.
4. The status holder will then need to request a share code to be sent via email to the employer/ landlord etc., to prove their status and right to work or reside in the UK, or eligibility for support and benefits.

That of digital status, including an online immigration profile, and the process proving a status by using a 'share-code' are new concepts which are difficult to understand for our cohorts.

Whilst 6% of our respondents were not at all aware if they have received an email from the Home Office confirming their status, many we surveyed believe that the letter from the Home Office that was sent to them via email to acknowledge their application is enough to prove their status.

In addition, some respondents are not aware of the difference between Settled and Pre-settled status, and the eligibility and requirements for each status.

Some people may be unaware that they need help or may not know where to turn for help, as 37% of the respondents did not know who is in charge of the aftercare process. All of them may find themselves in an extremely vulnerable position, as it is unlikely that they will be able to manage their online immigration status independently.

Other people may not even know if their application has been successful, as they do not have access to their digital status or, simply, a personal email address. Out of the 6% of our research cohort who were not aware if they have received an email from the Home Office confirming their status, all except one, answered that they are 'looking after' the status themselves or that they do not know who is taking care of their status, meaning that they may not be able to access their status at all.

In addition, more than half of respondents would not know what to do if asked to prove their status, and many of these respondents did not understand the need to update their personal details.

Less than 40% of the respondents told us that they would know what to do if asked to prove their status by an employer or a landlord. Indeed, other responses or their personal situation indicated they may face difficulties.

3.3 Autonomy in managing the digital status

The Government has stated that the digital status will limit concerns for those experiencing domestic abuse, exploitation, or trafficking and reduces the risk of forgery.

However, those who cannot access to their status are de facto prevented from accessing support and services, from renting a house, accepting a job offer, or receiving medical treatment.

Indeed, a significant number of our respondents, mainly retired people and women, replied that a relative (normally children and spouses) or a community organisation are 'taking care' of their application after its submission.


Whilst it is positive that their status can be managed with help, it cannot be guaranteed that the third party is actively engaged in status management. There are risks involved in a community organisation looking after a digital status, particularly on the sustainability of this support, and the resources and staffing required to do this.

Indeed, having the digital status managed by someone else risks creating a new form of dependency, or deepening existing dependency, for many vulnerable EU citizens, with the risk of abuse or exploitation.


This would be the case for those who lack the skills to access their status, and also for those who lack IT skills but who would otherwise be self-sufficient.

In conclusion, less than half of respondents declared that they are 'looking after' their own status. However, this does not mean that they will actually be able to manage their status, as many among this group still declared that they would need help in order to access and prove their status, but they have no support to do so. This group comprises people of all ages.

CASE STUDIES



Ms V and her husband D came to us in order to receive support with their EUSS application. They are both Italian citizens who have lived most their lives in the UK. During the application process we noticed that Ms V passport was due to expire in the next couple of months. We stressed to her the need to update her details once she renewed the passport and told her she could come back to us. Ms V and Mr D came back some weeks later. She had renewed the passport and remembered that something important needed to be done with it, but none of them remembered the details. She did not check her email to see if she received confirmation regarding her status. She wasn't sure what status she had, she just knew to bring her passport to us. We were able to access her settled status only by using our records we had kept on her application, and the support we had provided.



During lockdown, we were referred Mr N's case. Mr N has a mobile phone (but not a compatible smartphone) but not a computer, access to the Internet, nor an email address. He has settled status and applied with the help of a friend who used their phone number and email address to apply for him. When in June, Mr N was trying to rent a house, he was asked to prove his status, and the landlord would not accept his passport as evidence of his right to reside. Mr N did not know how to prove his status and could not reach his friend who was out of the country. He will probably continue to face the same type of problems in the future, as he does not have the means or knowledge to access his online status.

The transition to a digital format has proved to be particularly challenging for groups and organisations working in the immigration sector, and for those applying, particularly the vulnerable.

The EU Settlement Scheme is based on the assumption that everyone has fair, equal and free access to the required technology. The process is straightforward for those confident with using the Internet and are in possession of the documentation required. However, it can be challenging and exclusive particularly for vulnerable people.

Our research highlighted the widespread lack of the digital means and tools required to apply, such as an email address or a compatible smartphone, as well as lack of capacity to access the digital status, as individuals struggle to access, update, and prove their immigration status. The research also found a general lack of understanding and awareness around the concept of digital status.¹⁰

The digital platform creates a dependency for help in applying, and in managing the status, undermining the autonomy of people and creating a dependency on others. There are also difficulties in proving a status to others, as well as the risk of elder or domestic abuse and control.

A significant number of applicants are required to provide supplementary evidence of their continuous residence in the UK. This poses additional obstacles in the application process, and similarly, in upgrading from Pre-settled to Settled status.

Our research also found that there is a lack of understanding around the transition from Pre- to Settled status, particularly in the knowledge and skills in how, or when to apply to upgrade a status.

Above all, our research emphasised the important role community organisations have played in raising awareness on the EUSS, particularly in their reach to the most vulnerable. They are also vital in providing support to those who are not able to engage with the application process, and in managing their status once awarded.

As of 30 June 2021, EU Citizens will officially be required to prove their status. Those who are unable to are at risk of further marginalisation, as they may not be able to find employment or housing, or open a bank account. Whilst this new immigration status is fully online, a 'digital audit' has not been conducted to ensure that the required technology and skills are available with the potential for discrimination and digital exclusion for EU citizens and their families going forward.

At the time of writing, the UK's future immigration system has not been set out, as this will be established in law via secondary legislation. The Immigration and Social Security Co-ordination (EU Withdrawal) Bill is still being examined by Parliament, whilst the House of Commons rejected an amendment which would give EU citizens physical proof of their new immigration status. The Bill will be examined again by the House of Lords for further debate on the amendments.

[10] As the Roma Support Group has highlighted "when mentioned on its own, Digital Status makes little sense". RSG, Statement on the impact of EU Settlement Scheme digital-only status on the Roma Community in the UK.

As a result, it is currently not clear what rules will apply to EU citizens and their family members arriving in the UK after the end of the transition period.

There is a need for analysis of the implications of how data is shared, and the measures in place for data protection and security alongside the general lack of understanding for EU citizens living in the UK.

In addition, digital-only systems are not infallible, digital data is frequently lost, stolen or damaged. This concern, coupled with the evidence that many EU Citizens lack the technology and skills to manage a digital status, would point to the conclusion that a tangible proof of immigration status is still necessary.

The limits of digital-only systems have also been demonstrated during the Covid-19 emergency, especially in reaching those who are digitally excluded, whilst new relations of dependency are emerging on services that can only be accessed digitally.

The research team & methodology

Founded in 2013, **New Europeans UK** is the charitable arm of New Europeans, originally to raise awareness of the EU citizenship rights and offer practical support to EU citizens, including advice on the EU Settlement Scheme. Since 2016, New Europeans UK has been supporting EU Citizens to regularise their status, as required by British law in the Withdrawal Agreement Bill, and in playing a meaningful role in their communities, and participating in life in the UK.

New Europeans UK undertook this research into the digital nature of this new immigration status as a result of working with over 1,000 vulnerable EU communities for the last 18 months to apply to the EUSS. The work was carried out in partnership with various organisations and groups, including the Comit.Es, Patronato ACLI UK, the Roma Support Group, and various Somali organisations, St Mungo's, Age Concern and CABs across London.

Patronato ACLI UK is a social network of professionals for Italian citizens living in Italy and in 20 other countries. It is a free and not for profit public service, offering information and protection of their welfare, economic and employment rights. Patronato ACLI noticed how it is becoming more challenging to provide valid support and continuous advice to individuals, families and entire communities as it became impractical for them to manage their status independently and to prove it to others.

Established in 1985, **the Comit.Es (Comitato degli Italiani all'Estero) of London** is part of the Committees of Italians Abroad network. It represents the Italian community, directly elected by Italian nationals living abroad. The Comit.Es works with diplomatic-consular services to protect the rights of Italian citizens; it promotes Italian culture and community participation through cultural activities and events; and funds research to identify the needs of the Italian community.

The **Roma Support Group (RSG)** is a Roma-led, London-based charity, supporting and advocating on behalf of Roma communities living in the UK. Since 1998, the RSG has been helping Roma families to settle in the UK and working to increase broader understanding of Roma culture and positive engagement with Roma communities. Since the Brexit Referendum, RSG has been working to increase engagement with the requirements of the EU Settlement Scheme (EUSS) process for Roma people, enabling them to exercise their right to permanent residence in the UK.

Research Background and Outline

Since early 2019, latterly with Home Office funding, New Europeans UK has been assisting vulnerable EU citizens, including older Italians who have lived in the UK for a long time,¹¹ and the Roma community.¹²

While a number of reports have been published on the difficulties experienced during the application process,¹³ this research explores the experience of vulnerable groups by focusing on older Italians and members of the Roma community. It exposes their understanding of, and skills required for, the EUSS application process itself, and for managing a digital status thereafter.

The research collates responses to a survey from over 260 individuals, conducted in English, Italian, Romanian and Polish.

Interviews were conducted in the summer of 2020 by staff and volunteers from New Europeans UK, Com.It.Es of London, Patronato ACLI UK, and Roma Support Group.

In conclusion, New Europeans UK and our partners on this research want to strengthen the calls made by different agencies for the application process to become more accessible, and for the digital status to be accompanied by a physical document.

The Research Methodology

The survey group comprised 500 individuals, with 263 responses.

The survey comprised three sections. The first outlined the demographic including age, nationality, employment and immigration status. The second section explored the phases of the application process, and the third

focused on awareness, skills and confidence required to manage a status once granted.

The research population was fairly heterogeneous in terms of age group and nationality.

Nationality

The most represented nationalities were Italian followed by Romanian and Polish. The majority of Polish and Romanian nationals also identify themselves as members of the Roma community.

Age group

43% of respondents were aged 30–65, while 37% were over 65, and 21% under 30.

Residence in the UK

35% of respondents have resided in the UK for more than 30 years, while 31% between 5 and 30 years and 35% for less than 5 years.

Type of status received

Among our cohort, 59% have applied for or received Settled Status, 40% Pre-settled status, whilst 1% of the respondents did not know which status they had applied for or received.

This report is a descriptive analysis of the experience of these groups in applying to the EUSS, exploring the obstacles and problems which are likely to evolve, and how the Scheme will affect vulnerable people in their daily lives.

Certain responses may be influenced by the fact that some respondents were also supported by the organisations conducting the survey.

[11] The Italian General Consulate in London counted the presence of more than 400,000 Italian nationals. However, it is likely that there are more than 700,000 Italians in the UK as many do not register to the Registry of the Italians Resident Abroad (AIRE). See [Consolato Generale d'Italia \(Londra\), "Gli italiani iscritti all'AIRE presso il Consolato Generale di Londra superano quota 400mila"](#) (July 2020).

[12] There are at least 200,000 Roma people in Britain with the vast majority of them being EU citizens. See RSG, "Brexit, EU Settlement Scheme and the Roma communities in the UK" (June 2020).

[13] See, for example, The Migration Observatory, "Unsettled Status – 2020: Which EU Citizens are at Risk of Failing to Secure their Rights after Brexit?"

Annex. Survey Questions

1) What's your age range?

Under 30 30-65 Over 65

2) What's your nationality? (If you have more than one, please indicate the one used for the application)

3) Do you identify yourself as a member of a particular group? (e.g. Roma)

Yes (specify) No

4) To which gender identity do you most identify?

Female Male Other

5) How long have you been in the UK? (as last period of continuous residence)

Less than 5 years 5-10 years 10-30 years More than 30 years

6) What is your occupation?

Employed Self-employed Unemployed
 Student Retired or Other (please specify)

7) Which status do you have/have you applied for?

Settled Pre-settled I don't know

8) Do you think you have received the right status?

Yes No

9) Did you apply as a non-EU family member?

Yes No I don't know

10) Did you need to access information in another language other than English to make your application and/or understand your status?

Yes No

11) How did you learn about the EUSS?

Government guidelines Newspaper Leaflet
 Family/friends Social media Other (please specify)

12) Did you need help to make your application?

Yes No

13) If yes, who helped you?

Friend/Relative Organisation Lawyer
 Other (please specify)

14) Did you have to provide evidence to prove continuous residence?

Yes No I don't know

15) Which kind of documents did you, or the person helping you, submit?

Council tax bill Other bills Bank statements
 Tax returns Others (please specify)

16) How would you most describe the process of submitting evidence? (you can choose more than one)

Easy Difficult Time-consuming Short
 Clear Unclear Other comments?

17) Did you receive an email from the Home Office confirming your status?

Yes No I don't know

18) After the submission of the application, who is taking care/who took care of the aftercare process (as in checking if you received an email from the Home Office)

Myself Someone else (friend/relative) I don't know

19) Do you have your own smartphone/computer and/or email address?

Yes No

20) Would you need help to log in and see your application details/outcome if needed to prove? (for example, to update your EUSS details if you change passport/email/phone number/UK address?)

Yes No

21) Do you know what to do or say if you are asked by an employer/doctor/landlord about your status?

Yes No

22) If you have Pre-Settled Status, do you know when and how to apply for Settled Status?

Yes No

23) If you have Pre-Settled Status, are you worried about not being able to access services/support because of your Status? (e.g. medical support, benefits, ..)

Yes No

24) Do you have any other comments on the application or post-application process that you would like to submit?

For more information visit
www.neweuropeans.uk

