

Methods of increasing the capacity of immigration advice provision

Executive Summary

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Executive summary

Introduction and context

The Legal Aid, Sentencing and Punishment of Offenders Act 2012 (LASPO) introduced sweeping cuts to public funding for immigration advice in England and Wales, leaving many people without access to justice and resulting in the closure of many not-for-profit (NFP) and private providers of immigration advice. It marked a watershed moment for organisations supporting people with immigration advice needs.

To cope with the shortfall in provision, NFPs began to explore more systemic ways to enhance and manage the supply of quality, specialist immigration advice. NFPs were supported and encouraged to explore such schemes by charitable funders who, mindful that charitable funding could never make up the shortfall of advice lost through legal aid cuts, have been keen to explore more strategic approaches to bridging the need–provision gap.

This report was written before the COVID-19 pandemic struck in March 2020, but the research and recommendations are as relevant now as before, possibly more so. Over the past weeks, service providers have shown remarkable ingenuity and resilience as they adapt to the requirements of social distancing rules. Further adaptations may be needed: the pandemic could affect the way immigration advice services are delivered for some time. Some findings in this report will have direct relevance as providers identify and design new interventions (telephone and video-based advice for instance), whilst many of the methods identified – such as communities of practice, referral partnerships and training – can be taken online. The principles underpinning them, including strong partnerships, are even more crucial in these challenging times.

About the research

Paul Hamlyn Foundation (PHF) and Trust for London commissioned Methods of Increasing Capacity of Immigration Advice Provision to explore the range of methods NFPs of immigration and asylum advice are using in the wake of LASPO reforms to respond to the dearth of specialist immigration advice that is free at the point of access. These methods are seeking to improve capacity, efficiency, accessibility or, in some cases, quality of advice, and evidence is needed on the impact of those methods, and their potential and limitations. The study's core enquiry was:

1. How are organisations trying to increase capacity in immigration advice provision, and what is the nature of the capacity created?
2. How are organisations increasing accessibility of immigration advice and for whom?
3. Is quality addressed by any of these methods, and if so in what way?

To better understand the methods being used, we focused initially on eight projects funded by PHF and Trust for London which could provide learning. The research was then broadened out to include any organisation or project if they were interested in contributing and were suggested for inclusion.

In this way we snowballed involvement and made it more likely that we could identify and include a fuller range of methods being used across the immigration advice sector. That said, this was not a mapping exercise of all provision, which was outside the scope of the research.

We also briefly considered issues of evidencing need and value of advice interventions, focusing particularly on challenges for evaluation in the immigration advice sector.

Over the two years of the research we conducted 110 interviews with 71 individuals, received various written submissions and documents from a further 11, held six learning sets for NFPs to contribute their thoughts on emerging issues, and conducted an extensive literature review.

From this we were able to categorise the projects and services NFPs were pursuing to try and increase capacity or efficiency into overarching methods. We tested and evolved these categorisations throughout the course of the research.

The findings from this study will be helpful for: funders of immigration advice services, to help them understand what works, in what circumstances and for whom; providers who may be considering the best ways to develop, maintain and evaluate their services; and for policymakers who may wish to understand the practical implications of policies affecting the provision of immigration advice.

The current climate for immigration advice

Demand for immigration advice is being driven by a range of contextual factors including the hostile (compliant) environment policy, lack of public funding for many types of immigration advice and the time-consuming or dysfunctional systems to access the legal aid which remains. This both increases the reasons why people would need advice and reduces the means whereby they might receive it.

The Hostile Environment Policy,¹ announced in 2012, was a set of administrative and legislative changes designed to make staying in the UK as difficult as possible for those without leave to remain (LTR). Its measures are complex, far-reaching and still evolving. We describe these measures and their impact in detail in Section 2.

Provision of immigration advice has significantly reduced since LASPO and people have difficulty finding specialist advisors to take on their case. In some parts of the country, or for some kinds of issues, that difficulty is greatly compounded: 'advice deserts' (where no or few legal aid providers exist) now make finding any legal support in some areas impossible. If a person's legal issue is 'out of scope' (not funded by legal aid), they are dependent on a thinly spread network of provision, largely based on NFP providers operating nationally or in rarer cases locally. It is difficult for such people to find any advice at all.

The legislative framework that advisors must interpret and navigate is "*inaccessible, unclear and constantly shifting*".² Successive and numerous Acts of Parliament, a plethora of fast-changing secondary legislation ('immigration rules') to keep track of (5,700 changes since 2010³) and case law (needed all too often to clarify or challenge policy) mean that advisors need capacity to keep up to date with the framework, and more clients need advice as they have little chance of navigating it unaided.

The consequence of these measures for immigration advisors has been to create more work (e.g. new Windrush cases) and increase the complexity of supporting individuals. Clients no longer need advice 'just' about their immigration application but also potentially about being refused services or benefits, or being discriminated against in a range of ways, including by the immigration and asylum system itself.

1. This was rebadged 'the Compliant Environment policy' in 2018 when Sajid Javid became Home Secretary: the measures, however, remain the same.

2. *Free Movement article*. The Law Commission is consulting on how to simplify the immigration rules.

3. <https://www.theguardian.com/uk-news/2018/aug/27/revealed-immigration-rules-have-more-than-doubled-in-length-since-2010>

Need for immigration advice

The research gives an overview of the various types of people needing immigration advice. These include: people on a route to citizenship; people with long residence seeking to regularise their status; people seeking asylum; people with refugee status; people who may become 'irregular' through a change of circumstances; and children, who are a sub-set of some of the above categories as well as dependents. Statistics overall are imprecise on any of these categories but this research assembles available data on each category.

People are at risk of exploitation and destitution if they do not find advice. These include situations where children are involved, either in their own right or as the dependents of people needing advice; those trapped in exploitative or violent situations, particularly people who have been trafficked and survivors of domestic abuse; those who are in or at risk of destitution as a result of irregularity and policies created under the hostile environment.

Those presenting the greatest pressure on provision in terms of numbers across the country are (i) people with failed asylum applications seeking to make fresh claims, who, because of dispersal arrangements live across different regions, and (ii) those who have lapsed into irregularity because of overstaying their permission to stay in the country. Both risk or are in destitution and both require specialist advisors with an expert grasp of both immigration and human rights law to help them resolve their situation if possible.

Various factors also compound the difficulties people have in accessing advice, for instance their internment in detention or prison facilities and a range of systemic issues which serve together to render the need for advice more frequent and important. These include: the legislative framework itself (so complex that navigating the immigration and asylum system requires specialist advisor support); the fees for many immigration applications, which require intervention in order to secure fee waivers if possible; and the digitisation of the application process, which risks locking people out of routes to regularity if they cannot access and understand the forms that need to be filled in.

Immigration and asylum advice is therefore needed by a highly diverse client group, dispersed throughout the UK, often hidden or difficult to find and who may have significant personal or practical barriers to accessing such advice (e.g. language, mental health issues, lack of knowledge of 'the system').

Current provision

The number of specialist immigration advice providers has more than halved over the last few years, with notable advice deserts opening up in areas of acute need such as the North West, South West and much of Wales. In some areas of the country there are no providers taking cases that are out of scope of legal aid (which includes most immigration cases). Elsewhere, only one or two are trying to field increasing volumes of people who cannot find legally aided or free specialist advice. Even where there is provision, such as in London, the numbers of urgent cases far exceed what existing provision can cope with.

Findings on methods of increasing the capacity of immigration advice

The research identified nine methods which in some way increase the capacity of the NFP sector to meet immigration advice needs, either by introducing new provision (e.g. new advisors trained) or by delivering existing advice in more efficient ways. These methods can also promote greater accessibility of services to those who need them.

We grouped these methods into three categories:

Category 1:

Methods aimed primarily at **creating new capacity in the system of immigration advice provision.**

1. Pro bono
2. Capacity-building
3. Support teams (non-advice)

Category 2:

Methods aimed primarily at **increasing the efficiency of how existing specialist immigration advice is provided.**

4. In-house investment
5. Remote advice and casework
6. Outreach and referral partnerships
7. Joint working

Category 3:

Methods aimed primarily at **changing the environment specialist advisors are working in.**

8. Online information
9. Strategic work

Each method is considered in detail in this report. For each, we provide a description and give examples of how it is used, the clients and types of cases it seems appropriate for, examine how it produces efficiencies and other benefits for clients, NFPs and the sector more broadly and, finally, consider limitations.

The research also provides lessons for replicators: what is needed in terms of resources and skills to set up and run each method, what the key lessons are of doing so and what is the potential for development.

Table 1 opposite gives an overview of the methods identified, explains what they are and highlights the clients most likely to benefit from each.

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Table 1: Typology of methods for increasing the capacity of immigration advice provision

Method and sub-categories	Definition and use	Who benefits from this method?
Methods aimed primarily at increasing capacity		
<p>Method 1: Pro bono</p> <p>1.a. Pro bono lawyers take on whole cases</p> <p>1.b. Pro bono lawyers input into casework</p>	<p>Enabling commercial lawyers to give immigration advice</p> <ul style="list-style-type: none"> Lawyers from commercial firms are recruited and supported to take on certain types of immigration case as part of their pro bono work. Lawyers from commercial firms do specific tasks which enhance current provision. 	<ul style="list-style-type: none"> Relatively time-limited, discrete (as an area of law) cases, which have a reasonable chance of reaching a positive outcome. Cases not eligible for legal aid. Cases that need limited legal interventions which can significantly improve a client's chance of success. More complex cases under supervision of a specialist.
<p>Method 2: Capacity-building</p> <p>2.a. Training and support</p> <p>2.b. Communities of practice</p>	<p>Training and supporting more individuals and organisations to provide advice accredited by the Office of the Immigration Services Commissioner (OISC)</p> <ul style="list-style-type: none"> Training and support provided to (i) individuals in organisations (which may or may not be OISC accredited) and (ii) organisations needing help to register with OISC. Communities of practice, often online, which facilitate ongoing learning. 	<ul style="list-style-type: none"> NFPs are the primary beneficiaries of this method. Often community-based, they are motivated to participate because they are in contact with people needing immigration advice. The people they can help and what they can do for them will depend on what level staff and volunteers get accredited.
<p>Method 3: Support teams (non advice)</p> <p>3.a. Volunteer and staff teams support specialist provision</p>	<p>Volunteer or staff teams support specialist advisors to do tasks not requiring OISC accreditation</p> <ul style="list-style-type: none"> Volunteers are trained and supervised to help clients understand and cope with the system and navigate some of the lower-level requirements such as filling in application forms, or collecting evidence to support applications. In-house staff teams are trained and supervised to give information or complete a largely administrative element of a process. 	<ul style="list-style-type: none"> People with immigration issues which involve completing long, complex forms and collecting evidence. People seeking asylum trying to orientate themselves in the system, both at initial application stages and once refused (looking for fresh claim). People on the brink of destitution because of a failure to provide support. People with LTR on the condition of having no recourse to public funds (NRPF).

Table 1 (cont.)

Method and sub-categories	Definition and use	Who benefits from this method?
Methods aimed primarily at increasing efficiency		
<p>Method 4: In-house investment</p> <p>4.a. In-house training for non-specialist staff and volunteers</p> <p>4.b. Legal aid billing efficiency measures</p> <p>4.c. Investing in future specialist advisors</p>	<p>Specialist advice providers develop their own capacity and efficiency</p> <ul style="list-style-type: none"> • Training non-specialist staff and volunteers to better signpost, triage and support clients. • Measures to remove non-advice tasks from specialist advisors (particularly legal aid billing). • Investing in specialist advisors of the future using in-house training and support programmes. 	<ul style="list-style-type: none"> • Clients of specialist advisors in law centres, Citizens Advice Bureaux (CABx) with specialist immigration provision and refugee and migrant organisations employing specialist advisors. • Such specialist providers are either in areas of greatest need or being created by employing new specialist advisors in organisations experiencing high immigration advice need amongst their clients. • Clients are therefore the most vulnerable.
<p>Method 5: Remote advice and casework</p> <p>5.a. Telephone advice to clients</p> <p>5.b. Second-tier Advice Line</p> <p>5.c. Webcam advice and casework</p>	<p>Organisations advise clients remotely via the telephone or internet</p> <ul style="list-style-type: none"> • Telephone advice lines provide advice directly to clients. • Telephone advice lines provide advice to professionals working on individual client cases. • Casework is conducted online, for example via webcam. 	<ul style="list-style-type: none"> • Clients in advice deserts where there is nowhere else to turn. • Clients who are trapped or vulnerable. • Professionals working with people experiencing vulnerability as a result of their immigration status. • People who cannot access a local centre. • Dispersed clients – to ‘find’ them and allow for resolution or further referral to services.
<p>Method 6: Outreach and referral partnerships</p> <p>6.a. Outreach partnerships</p> <p>6.b. Referral partnerships</p>	<p>Specialist providers establish partnerships with frontline organisations which enable clients to access immigration advice</p> <ul style="list-style-type: none"> • Outreach partnership: specialist advice provider(s) goes out to deliver immigration advice to the clients of a frontline organisation at the premises of that organisation. • Referral partnership: specialist advice provider(s) creates a formal agreement with a frontline organisation about making referrals and guarantees to take a certain number of clients per month (or other time period). 	<ul style="list-style-type: none"> • Vulnerable clients with transient lifestyles but who may come into contact with community, health or emergency support services. • Clients who do not speak English, particularly in a referral partnership with a community organisation which has staff and volunteers who can speak and gain trust in the client’s own language. • Clients with undiagnosed immigration advice needs in contact with services. Specialist advice agencies help partners with other specialisms (e.g. health, housing, domestic violence (DV)) to become more aware of immigration issues.
<p>Method 7: Joint working</p> <p>7.a. Specialist providers deliver jointly planned service</p>	<p>A specialist advice provider teams up with a specialist support agency to work collaboratively on resolving clients’ legal and support issues</p> <ul style="list-style-type: none"> • Involves two organisations coming to a bespoke arrangement to reinforce one another’s work with particular groups of clients, drawing on technical skills which both have. 	<ul style="list-style-type: none"> • Particularly vulnerable people with immigration issues who need help and support to access advice, understand the situation they are in and continue to engage with legal advice for as long as their case lasts. • People whose immigration cases are complex, urgent and not covered at all or adequately by legal aid.

Table 1 (cont.)

Method and sub-categories	Definition and use	Who benefits from this method?
Methods aimed at changing the context		
<p>Method 8: Online information</p> <p>8.a. Educating clients through online information</p>	<p>Providing information online accessible to clients</p> <ul style="list-style-type: none"> • Clear and accessible information on the immigration and asylum systems and common issues and dilemmas this involves to help clients better navigate the system and gain agency in their own case resolution. 	<ul style="list-style-type: none"> • People with an immigration issue who can get online and cannot get advice in a physical location (particularly in advice deserts). • People receiving advice who do not fully understand what is happening as there has been insufficient time for an advisor to explain this. • People seeking asylum in particular as process and routes are more straightforward and easier to explain online.
<p>Method 9: Strategic work</p> <p>9.a. Strategic litigation</p> <p>9.b. Policy and influencing work</p>	<ul style="list-style-type: none"> • Strategic litigation involves taking cases to court, which can bring about significant changes in law, practice or public awareness. • Policy work is essential if the nature and depth of the challenges and discrimination people with immigration issues face is to be lodged, and kept lodged, on the agenda of those with influence to effect policy and change in practice. 	<ul style="list-style-type: none"> • These methods may affect any and all current and future clients of immigration advice providers.

How organisations evidence the need for and value of their work

Need in the immigration advice sector is often identified reactively, that is by responding to presenting need at the door or on the phone, identifying that services are closing, liaising with other services to spot pressure points for provision or identifying policies which have a severe impact on people needing advice. Projects and services are also created to test new approaches that providers believe will be effective. Funder priorities are also important for determining the emphasis of provision, particularly at local level, although funders tend to react to the ideas NFPs bring forward rather than prescribing approaches.

We knew prior to the research that evaluation in the immigration advice sector is challenging and services often do not have the time or resources to do more than seek to count interventions and report on activity. The research looked at how different services were seeking to evaluate their impact and learning and produced a separate paper on evaluation summarising key issues and suggestions.

Challenges identified or reinforced through the research included the difficulty of linking the value of work to case outcomes. Given the length of time many cases can take, the short-term nature of much funding and the lack of resources available to track client outcomes following funded interventions, getting a full picture of impact can be difficult in this regard.

Additionally, NFPs can lack internal resources to consider impact learning. In particular, they experience challenges in terms of inadequate data collection systems, no shared language around evaluation terms and concepts, multiple funder interests and key performance indicators and particular difficulties when collecting information across different partners.

The research considers in some detail commonly used client outcomes and the issues posed by trying to track these, and also the issues involved with commissioning baseline surveys against which to measure progress, which are rarely easy to do, particularly given that external evaluation is often commissioned after a project has begun.

Our recommendations include suggestions for strengthening the capacity of organisations in the immigration advice sector to evaluate and learn from what they are doing.

Conclusions from the research

The research provided an overview both of the need for immigration advice and the methods which are being pursued to 'do more with less' and increase capacity, efficiency and accessibility in the system of immigration advice provision. It was possible to draw the following conclusions.

Demand for immigration advice

Two broad categories of demand emerge: people seeking asylum making fresh claims (because their initial application has been unsuccessful), and people who have irregular status and risk exploitation, destitution or violence as a result. The cases which threaten serious consequences for clients if not resolved require specialist input (OISC Level 2 and above) to unravel and progress, particularly given that many may have compounded the seriousness of their situation through a combination of previous contact with immigration or asylum authorities, inaction, poor advice or (knowing or unknowing) criminal activity. The most acute dearth in immigration advice provision is at this specialist level (OISC Level 2 and above).

Increasing capacity

The research found that all methods could increase capacity at least slightly, either by introducing new provision, using the provision which exists more efficiently or by removing barriers that cause more work for specialist advisors.

The most significant increase in organisational infrastructure and capacity results from **Method 2.a. (Training and support)**. Though this method does not produce immediate increases in provision (except for in already registered OISC providers), it is most likely to increase the sector's capacity to deliver immigration advice in the medium to longer term. Its ability in particular to introduce new provision into advice deserts is unique. Two other methods – **Method 1.b. (Pro bono contributions to advice)** and **Method 3 (Non-advice support teams)** – also increase capacity in broadly the same way and allow others to take on tasks (either regulated or non-regulated) which specialist advisors would otherwise struggle to find time to do. The contribution of pro bono lawyers (Method 1.b.) is most effective when supporting high-level, complex cases adding specialist capacity to, for example, research needed for challenging asylum refusals. Non-advice support teams are most effective where there is a large volume of similar cases requiring intensive form-filling or information-gathering which need only light supervision from a specialist advisor to complete.

Method 4 (In-house investment) can also unlock new capacity. In particular, support with legal aid billing can release specialist advisor time from the administrative requirements involved, as well as increase income, potentially enabling more specialist advisors to be employed. Given the scarcity of specialist advisors, this method, though not piloted to specifically increase immigration advice, has the potential to boost provision where it is particularly needed: in specialist hubs of provision.

Increasing efficiency

Focusing on efficiency is particularly relevant within local systems of provision where savings can be made by NFPs working better and more collaboratively, thereby making more effective use of available capacity. The method which most significantly increases efficiency is **Referral partnerships (Method 6.b.)**. The research showed that significant amounts of time could be saved by working with referral partners to enable them to identify and triage cases; this saved time spent by the specialist advisor on these areas as well as avoiding the need to field diagnostic calls about inappropriate cases. This method also worked well in terms of boosting some capacity in the referring partner, and has kicked off further consideration of how to save time in other areas of operation (i.e. thinking about efficiency in one area has prompted thinking about it in another). Joint working (Method 7) also increased efficiency by enabling specialist advice and support to be delivered in tandem, playing to specialists' strengths and reducing the need for repetition of support or the potential for client drop-out.

Increasing accessibility

All of the methods to some extent increased the accessibility of immigration advice. However, the ones which stood out were **Training and support (Method 2.a.)**, **Telephone advice to clients (Method 5.a.)**, **Second-tier Advice Line (Method 5.b.)**, **Outreach partnerships (Method 6.a.)** and **Referral partnerships (Method 6.b.)**.

Two of these particularly address the issue of advice deserts. **Training and support (Method 2.a.)** has the potential to introduce new provision where currently none exists but takes longer to embed, does not always result in more advisors actually giving advice and can be challenging to implement.

In contrast, **Telephone advice to clients (Method 5.a.)** is possible to access anywhere, and advice lines that allow for professionals to get specialist guidance can ensure that even those struggling with language or mental health issues can be supported to access and comprehend advice. However, remote advice has limitations in terms of what it can achieve for clients with complex cases who will need to see an advisor if their cases are to progress. In this respect, second-tier advice lines may merit further investment as they at least ensure that clients have access to some support until routes to specialist advisors, including travelling to reach them, are worked out.

Outreach and Referral partnerships (Methods 6.a. and 6.b.) cannot reach clients in advice deserts by definition: they require a specialist advice provider nearby to operate. They are however both notable for their potential to forge links into frontline organisations which people needing immigration advice may come into contact with, including not only community organisations but also public services such as health providers. Such partnerships allow those who do not speak English and/or people who do not trust services more generally to gain access to specialist advice. **Pro bono casework (Method 1.a.)** also increases accessibility in that such programmes raise awareness and may increase access points for people with specific immigration issues. The fact that such programmes may attract funding means that they are more likely to carve out protected provision for certain vulnerable groups.

Improving quality

Pro bono input from commercial lawyers (Methods 1.a. and 1.b.) can significantly increase quality as well as the experience for the client through intensive support by motivated commercial lawyers acting under specialist supervision. This is particularly true when they conduct end-to-end casework (Method 1.a.) but quality is also enhanced by any contribution (Method 1.b.) which leverages additional expert input into otherwise sparsely resourced casework.

Joint working (Method 7) between a specialist advice provider and a specialist support organisation also improves quality significantly. It ensures that the strengths of specialist providers are brought forward to best support the client, and professionals can also learn from one another and adapt their approach.

Sustainability issues

However successful any of the methods outlined are at creating capacity, efficiency or accessibility, all of them rely on having specialist providers which can field complex cases and, if necessary, take judicial reviews to challenge unjust policy or decisions. Such cases can involve high stakes for some of the most vulnerable people seeking immigration advice, and both untangling their situation and making critical judgements as to how to proceed is only possible by specialist advisors with an extensive grasp of immigration and human rights law. If clients and those providing lower-level immigration advice cannot refer such clients, any system of provision either blocks up or else abandons those who need help most.

The exodus of specialist advisors from the sector as well as the ongoing challenges of recruitment mean that investing in methods which motivate and train 'new blood' to come on stream is necessary if any solutions to the need-provision gap are to prove sustainable. **Training and support (Method 2.a.)** allows in part for this to happen, and investing in **training and supporting specialist advisors in-house (Method 4.c.)** is also essential if future sustainability is to be tackled.

Sustainability of provision is also affected by the degree to which immigration advice is supported by other forms of advice, notably welfare benefits and housing. It is neither possible nor desirable to

provide immigration advice in a vacuum for many clients existing below the radar or with 'no recourse' conditions⁴ attached to their LTR. Without such provision, immigration advice may be wasted if people fall out of contact because they are focused on their survival rather than regularising their status.

Evaluation issues

The immigration advice sector is both consolidating and transforming. Various methods are being piloted to deal with the chronic shortfall in provision. However, evaluation methods deployed within NFPs do not always help genuine learning and adjustment, focusing as they often do on producing evidence to satisfy funder requirements rather than allowing more flexibility of approach. In addition, the complexity of the immigration system and lengthy delays in decision-making by government departments can frustrate attempts to show outcomes. Furthermore, capacity to assess and describe impact is undermined by lack of skills, time, understanding of key terms, adequate data recording systems and multiple reporting requirements.

Digital issues

Digital methods can add value where individuals need to find information, get referred to specialist services, access advice given by a person remotely or discover options for support. Digital solutions are also proving valuable for online learning. However, there are limits to what digital solutions can achieve. For example, replacing face-to-face discussion with digital diagnostic tools is for the moment outside the scope of what computers can achieve. Efforts to do this elsewhere (in Australia, in particular) have failed.⁵ It is worth flagging this in particular given the government's focus in its recent Legal Support Action Plan⁶ on legal support as opposed to legal advice and the emphasis this seems to place on non-legally qualified people and potential tech solutions, rather than qualified and experienced advisors.

Creating digital solutions to improve efficiency in administrative processes are likely to be resource-intensive up front, partly because such methods require a culture shift in the sector generally. Early indications however are that they can prove extremely useful given enough resources to develop and time to embed.

Recommendations

The research makes 16 recommendations for funders and NFPs to build on the findings from the research.

The key need to reinforce specialist advice providers, which exist as the bedrock for future service improvements, is highlighted in Recommendation 1. All of the methods outlined in the research depend to some extent on the existence of such providers.

Recommendations 2–4 address the **need to develop a greater understanding of both need and supply in regional areas** in order to understand what methods it may be appropriate to support and develop. These include: undertaking detailed regional mapping of both immigration advice and the wider access to justice sector, supporting regional conventions to discuss and plan in the light of regional realities of demand and current supply, and potentially developing an online client resource to help those seeking services in the area navigate the services available.

4. The 'no recourse to public funds' condition is imposed on some grants of limited leave to enter or remain. It prevents the person with that leave from accessing certain defined public funds including all main benefits, allowances and credits.

5. <https://www.theguardian.com/australia-news/2017/sep/22/ndia-denies-cate-blanchett-voiced-nadia-virtual-assistant-is-in-doubt>

6. <https://www.gov.uk/government/publications/legal-support-action-plan>

Recommendations 5-10 outline a range of suggestions **to support and increase capacity and efficiency of service provision**. The detailed findings of the research will need to be taken into account by both funders and NFPs when considering which are suitable for their region. For instance, when thinking about supporting projects to build capacity, funders should take into account the back office and infrastructure costs implied in each and build this into their funding model. Funders will also need to consider investing in onwards referral capacity when supporting the development of OISC Level 1 and 2 provision.

Resources can also potentially be used more efficiently if **information resources for clients are developed centrally** (and not separately by NFPs), if **digital referral systems are further investigated** (with the caveat that these take upfront resources to design and embed) and if some **sector-wide support for the development of case management and data recording systems** is given to mitigate the cost and risk for NFPs of updating the systems they are using.

Recommendation 11 acknowledges that the wider context of the immigration system is currently not fit for purpose and that a small number of creative charitable foundations and NFP organisations cannot themselves address the loss of statutory funding nor inefficiencies and challenges in the wider system. **Policy and advocacy work should be supported by funders alongside work developing services.**

Recommendations 12 and 13 note that whilst detailed learning has been gained on the methods identified, this will need to be updated partly because many of the projects examined were at an early stage of development with more learning to unravel. **Supporting work which updates the lessons and methods contained in the research** is necessary to maintain relevance in a rapidly evolving field of provision. In addition, NFPs which have benefited from sharing lessons between themselves in the course of the research would welcome **future opportunities to learn from one another** about service development.

Recommendations 14-16 address the need to **improve both understanding and practice of evaluation in the immigration advice sector**. The sector would benefit from more staff roles which focus on learning, and consideration should also be given to developing a sector-wide resource to be used by funders and practitioners to help create a common language and provide pointers for suitable evaluation methods. In addition, funders should consider moving away from pre-set targets and activities when allocating funds and instead provide funding linked to achieving broad impact goals – an approach which has been demonstrated in the health sector as allowing for greater flexibility, inventiveness and learning.



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