

The Rt Hon Shabana Mahmood  
Home Office  
2 Marsham Street  
London  
SW1P 4DF

**Wandsworth Council**  
Town Hall  
Wandsworth High Street  
London SW18 2PU

Date: 28 January 2026

Dear Home Secretary,

We are writing jointly as Co-Chairs of the Wandsworth Migration Board, which brings together statutory and community organisations supporting people seeking sanctuary across our borough. As a proud Borough of Sanctuary, we are committed to ensuring that people seeking safety are welcomed, included, and able to rebuild their lives within our community. While we welcome the opportunity to engage with the Earned Settlement consultation, we remain deeply concerned about both the proposals and the accessibility of the consultation itself.

Many of the people we support are already navigating long and complex settlement routes. The suggestion that transitional protections may not apply to those currently on lawful pathways is particularly troubling. Retrospective changes of this scale would create profound uncertainty and significantly increase the risks of destitution, homelessness, and exploitation. It would also place additional pressure on already overstretched local authority services and voluntary sector providers.

We are especially concerned about the proposal to lengthen settlement routes to ten, fifteen, or even twenty years. For refugees and others who have fled displacement and trauma, prolonged insecurity undermines both recovery and long-term integration. Delayed access to settlement restricts opportunities for stable employment, housing, and family life, and can perpetuate cycles of poverty and dependence on crisis support.

These proposals also have serious implications for workforce sustainability. Many people on extended routes are employed in lower-paid but essential roles, including social care, health support, hospitality, and cleaning. These sectors are already facing severe staff shortages. Making settlement harder to achieve risks deterring recruitment and destabilising services that our communities rely upon. The current proposed reduction for those in public service roles is worded too narrowly to mitigate these impacts.

We are equally troubled about proposals to penalise people who need to access public funds. Individuals turn to the welfare system in moments of crisis - due to illness, domestic violence, relationship breakdown, exploitation, or caring responsibilities - not through choice. Penalising this use risks deepening hardship and placing vulnerable people at risk of exploitation. Settlement should

provide security and full access to rights, not introduce new forms of conditionality linked to vulnerability.

The potential extension of NRPF conditions and the lengthening of qualifying periods would leave many low-income workers and newly recognised refugees in prolonged financial precarity. This is likely to result in increased rough sleeping, hidden homelessness, and unsafe informal housing arrangements. Local authority services and voluntary and community sector organisations in Wandsworth already operate at capacity to prevent these harms. The proposed changes would significantly increase demand for emergency accommodation, hardship funds, advocacy, and safeguarding interventions, placing further strain on local authority budgets and voluntary and community sector capacity.

Finally, we wish to raise concerns about the accessibility of the consultation itself. Several questions were poorly framed, including the use of double negatives, making them unnecessarily difficult to interpret. A consultation that affects people's futures must be written in clear, accessible language, particularly for those with limited English and lived experience of trauma.

We therefore urge the Home Office to reconsider these proposals and to ensure that future policy is grounded in meaningful engagement with affected communities and frontline services. In particular, we call for full transitional protections for those already on lawful settlement routes, the removal of penalties linked to accessing public funds, and the retention of timely and realistic pathways to settlement for refugees and migrant workers.

We would welcome the opportunity to discuss these concerns with you and your officials and to share further evidence from our member organisations and residents.

Yours sincerely,

Cllr Sarmila Varatharaj

Co-Chair, Wandsworth Migration Board. Deputy Cabinet Member for Communities, Labour Councillor for Wandle Ward.

Sarah Gibb

Co-Chair, Wandsworth Migration Board. CEO, Katherine Low Settlement

Cllr Kemi Akinola

Deputy Leader of the Council, Labour Councillor for Tooting Broadway Ward