

Meeting of:	Cabinet
Date of Meeting:	Thursday, 11 June 2026
Relevant Scrutiny Committee:	No Relevant Scrutiny Committee
Item which the Chair has decided is urgent (Part I) (If yes, why)	Not applicable
Urgent Decision Procedure Used (15.14 of the Constitution) (If yes, why)	Not applicable
Item Type	Part I
Report Title:	Vale of Glamorgan Council No Recourse to Public Funds Policy
Portfolio Holder:	Cabinet Member for Community Engagement, Equalities and Regulatory Services
Strategic Leadership Team:	Director of Corporate Resources
Lead Officer:	Director of Corporate Resources

1.0 **What is this report about?**

- 1.1 This report provides an overview on the proposal to approve a formalised and consistent approach to supporting residents who have no recourse to public funds (NRPF) through the adoption of the Vale of Glamorgan Council's No Recourse to Public Funds Policy.
- 1.2 This policy creates a common understanding and approach across the organisation consistent with legal requirements and best practice. It will ensure that any related support and help that is required is offered in a timely, fair, and lawful way.
- 1.3 The policy outlines the Council's commitments to people who have NRPF, supporting commitments within a number of local and national strategies and plans including [Vale 2030](#) and the [Welsh Government \(2019\) Nation of Sanctuary Plan](#).

2.0 What are the Recommendations?

	Recommendations – What and How?	Reason for Recommendation – Why?
2.1	That Cabinet notes the context of this work and its links to existing commitments.	To enable Members to consider the policy in its full context of local commitments within Vale 2030 and national commitments and feedback any comments for policy development.
2.2	That Cabinet approves the Policy for implementation across the Vale of Glamorgan Council.	To ensure the Council has a formalised, consistent approach to supporting residents with No Recourse to Public Funds.

3.0 What is the background to this report?

- 3.1 This policy has been developed to formalise ways of working across the Council to ensure a consistent approach is taken when supporting people who have no recourse to public funds (NRPF), to ensure that any related support and help that is required is offered in a timely, fair and lawful way.
- 3.2 NRPF is a visa restriction which applies to migrants who are 'subject to immigration control' and as a result have no entitlement to certain welfare benefits, Local Authority housing and homelessness assistance.
- 3.3 The NRPF restriction is applied as a visa condition under UK immigration law and overseas citizens in the UK without a visa are automatically subject to NRPF.
- 3.4 The rules surrounding NRPF can be complex and the design of the welfare system means that an individual's status can have impact on the entire household, even where another person is entitled to benefits.
- 3.5 Whilst many people who have NRPF have the financial resources to sustain themselves and their dependants, the rules governing NRPF are complex and an individual's circumstances can change, often as a result of factors outside of their control. If someone cannot support themselves financially, they and all their household will be unable to access public funds.
- 3.6 There are many different types of immigration statuses in the UK and different groups of people who typically have NRPF applied to them can have different support needs and different rights and entitlements. Anybody who is not a UK citizen can have NRPF applied to them, and this includes people without immigration status. Some people must meet right to reside conditions before they can access welfare benefits. Non-UK citizens do not automatically qualify for public funds.
- 3.7 To help staff across the organisation have a clear and consistent understanding of NRPF and what support is available by understanding what is and is not classed as a 'public fund

for immigration purposes' the Vale of Glamorgan Council welcomed an invitation from the Bevan Foundation to work with partners on a [project to co-develop a NRPF policy template for all Local Authorities in Wales](#). The template policy was developed based on insights from Local Authorities, third sector organisations and experts by experience in addition to being designed in line with key legislation, local and national strategies and action plans and best practice/guidance including the Welsh Government NRPF Guidance 2022-24. The Bevan Foundation coordinated work between three Local Authorities (including the Vale of Glamorgan), six third sector organisations and thirty people with lived experiences as part of the drafting process. The final template developed by the Bevan Foundation project also reflected additional feedback from stakeholders at a [national event held in March 2025](#) where attendees from a range of sectors provided comments on the draft version, which were reflected where possible in the final version.

3.8 This final template formed the basis of the Vale of Glamorgan NRPF Policy and has been adapted by the cross Directorate Internal NRPF Policy Development Group to reflect local ways of working and commitments, including those in [Vale 2030](#), the [Vale of Glamorgan County of Sanctuary Action Plan](#), [Cardiff and Vale of Glamorgan Violence against Women, Domestic Abuse and Sexual Violence Strategy 2023-2028](#) and the [Vale of Glamorgan Council Local Housing Strategy 2021-26](#). The Vale of Glamorgan Policy has also been shaped by discussions at Strategic Leadership Team, Strategic Insight Board and the Corporate Safeguarding Group, resulting in a summary being developed to ease dissemination (Appendix B).

4.0 What issues are there to be considered?

4.1 This policy will formalise a consistent framework for services and their staff with the overall aim of ensuring the safety and wellbeing of people using Local Authority services within their communities. At present, work is ongoing across the Council to support those who are NRPF, however there is not a universalised approach to the support currently provided. Overtime, it is anticipated that this Policy will help improve the consistency of approach as well as data collection.

4.2 This work has also been developed in response to the expectations from Welsh Government set out within the NRPF Guidance 2022-24 for a Local Authority pathway. This policy outlines the Local Authorities' commitment, principles and approach to working with and supporting people who have NRPF. It gives guidance to staff who are working with all groups of people who have NRPF and ensures that any support and help that is needed is offered in a consistent, timely, fair, and lawful way.

4.3 Further work to develop practice guidance for Local Authorities in Wales to complement the policy to ensure a clear, easy to follow approach is taken to support staff to support people with NRPF is being developed by [another collaborative project, led by the Bevan Foundation](#). The Vale of Glamorgan Council has once again accepted the invitation to help shape this work as a Local Authority partner.

5.0 How has evidence been used to inform the report, including the views of others?

- 5.1 This policy has been produced in consultation with Local Authority staff and services, voluntary sector NRPF Coalition Wales, people with lived experiences of NRPF and specialist providers as part of the national work led by the Bevan Foundation to develop a policy template for Local Authorities in Wales. This template was used as the foundation of the Vale of Glamorgan Council's Policy to ensure the views of the stakeholders engaged in the Bevan Foundation work are reflected in our local response.
- 5.2 The final template developed by the Bevan Foundation reflected additional feedback from stakeholders at a [national event held in March 2025](#) where attendees from a range of sectors provided comments on the draft version which were reflected where possible in the final version.
- 5.3 As part of the local feedback on the final draft developed by the Internal NRPF Policy Group insights have been gathered via discussions at Strategic Insight Board on 6th October 2025, the Corporate Safeguarding Group on 20th October 2025 and the Strategic Leadership Team on 9th December 2025.

6.0 What are the next steps if the recommendations are approved?

- 6.1 If approved, the policy will be disseminated across all Local Authority staff to ensure a consistent approach is taken by all colleagues when supporting someone who has NRPF. The policy will provide guidance to staff who are working with all groups of people who have NRPF and ensures that any support and help that is needed is offered in a timely, fair, and lawful way.
- 6.2 To complement this work and support its implementation, the Local Authority will support the development of NRPF practice guidance for Local Authorities in Wales as part of the emerging Bevan Foundation project.
- 6.3 The policy will be reviewed on a biennial basis by the Internal NRPF Policy Development Group to review emerging feedback and ensure the most recent legislation and ways of working are reflected.

7.0 How does this report support Vale 2030 and Reshaping?

- 7.1 This policy is in line with several Objectives in Vale 2030, in particular Objective 3 'Giving everyone a good start in life' supporting access to support for families and young people, including those who may be living in poverty, and Objective 4 'Supporting and protecting those who need us' linking to work on tackling poverty, providing support, and work to deliver the Strategic Equality Plan including becoming a County of Sanctuary.
- 7.2 This work also supports Council commitments within the Vale of Glamorgan's County of Sanctuary Action Plan and builds upon the national commitment under the Welsh Government's Nation of Sanctuary: Refugee and Asylum Seeker Plan.

7.3 By providing a clear framework for staff across the organisation this policy will support the work of Reshaping by ensuring staff are confident in the process of supporting someone who has NRPF, enabling greater efficiency and ensuring a consistent service of support is provided to help strengthen our communities.

8.0 How does this demonstrate the Five Ways of Working?

8.1 The policy has been developed in line with the Well-being of Future Generations (Wales) Act 2015 and supports the Five Ways of Working. The policy has been developed in collaboration with the Bevan Foundation project partners to ensure the involvement and insights from a diverse range of public and third sector colleagues and people with lived experiences have been reflected. This policy supports and integrates with a number of local, national and international strategies, action plans, legislation and best practice guidance including Vale 2030, the Well-being of Future Generations (Wales) Act 2015, The United Nations Convention on the Rights of the Child 1989 and The European Convention on Human Rights 1953. By its nature of supporting those who have NRPF this policy has a prevention focus ensuring support is provided in a timely, fair, and lawful way, recognising the short term and long term needs.

Resources

9.0 Finance

9.1 There are no financial implications arising of the Council as a result of this policy. No additional resource is required for this policy's implementation as this work is already being conducted within current resources.

10.0 Workforce

10.1 There are no workforce implications arising of the Council as a result of this policy. No additional resource is required for this policy's implementation as this work is already being conducted within current resources.

11.0 Legal and Equalities

11.1 **Does an Equalities Impact Assessment need to be completed? If not, why?** An Equalities Impact Assessment has been completed and is attached in Appendix C.

12.0 Key Contacts

12.1 **Who are the primary officers to contact with any comments and/or queries on the report?**

Lead Officer: Iain McMillan, Head of Resource Management and Safeguarding, imcmillan@valeofglamorgan.gov.uk	Democratic Services Officer Matthew Swindell, Cabinet and Committee Services Officer, miswindell@valeofglamorgan.gov.uk
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Appendices

Appendix A – Vale of Glamorgan Council's No Recourse to Public Funds Policy.

Appendix B – Vale of Glamorgan Council's No Recourse to Public Funds Policy: Executive Summary.

Appendix C – Vale of Glamorgan Council's No Recourse to Public Funds Policy: Equality Impact Assessment.

Background Documents

[Vale of Glamorgan Full Council, 24th April 2023, Notice of Motion –County of Sanctuary](#)

[Vale of Glamorgan Council Cabinet, 18th July 2024 - Application to be Recognised as a County of Sanctuary](#)

[Vale 2030](#)

[Welsh Government \(2019\) Nature of Sanctuary Plan](#)

[Cardiff and Vale of Glamorgan Violence against Women, Domestic Abuse and Sexual Violence Strategy 2023-2028](#)

[Vale of Glamorgan Council Local Housing Strategy 2021-26](#)

Appendix A: Vale of Glamorgan Council No Recourse to Public Funds (NRPF) Policy



Section 1: Purpose

1.1 This policy outlines how the local authority assesses and supports:

- a) Children, young people and families; and
- b) Adults who may have no recourse to public funds (NRPF).

1.2 This policy is relevant to all migrants affected by NRPF. It may not automatically be obvious whether an individual has recourse to public funds or no NRPF. A person's status is determined via their eVisa by supplying a share code to the person who is checking, see link: [View and prove your immigration status: get a share code - GOV.UK](https://www.gov.uk/view-and-prove-your-immigration-status-get-a-share-code). Further information on identifying whether someone has recourse to public funds or no recourse to public funds is detailed in section 4.6.

1.3 No recourse to public funds (NRPF) is a visa restriction which applies to migrants who are 'subject to immigration control' and because of this have no entitlement to certain welfare benefits, local authority housing and homelessness assistance.

1.4 This policy provides a framework for services and their staff, with the overall aim of ensuring the safety and wellbeing of people using local authority services within their communities. This policy should be read within the context of the initial [Welsh Government \(2019\) Nation of Sanctuary plan](#) which sets out aspirations for the fair treatment of all living in Wales. The revised nation of Sanctuary Plan is reflected within the Anti-racist Wales Action Plan

1.5 This policy is relevant to all who are affected by NRPF, regardless of their immigration status, and includes but is not limited to people seeking asylum.

1.6 The Welsh Government NRPF Guidance [No recourse to public funds \(NRPF\): guidance \[HTML\] | GOV.WALES](#) (2022; 2024) refers to a local authority *No recourse to*

public funds pathway. This policy reflects the expectations of a local authority pathway and includes information that Welsh Government state should be included:

- an explanation to new and existing staff of how the local authority expects them to welcome and engage with migrants who access our services
- a presumption in favour of providing interim support to prevent destitution
- a commitment to upholding children's rights and maintaining families
- a guide to collecting and sharing data

Section 2: Introduction

2.1 This policy has been produced in consultation with local authority staff and services, voluntary sector NRPF Coalition Wales staff and services, people with no recourse to public funds and specialist providers as part of the national work led by the Bevan Foundation.

2.2 It sets out the local authority's commitment, principles and approach to working with and supporting people who have NRPF. It gives guidance to staff who are working with all groups of people who have NRPF and ensures that any support and help that is needed is offered in a timely, fair and lawful way.

Section 3: Legal and Policy framework

3.1 The NRPF restriction is applied as a visa condition under UK immigration law and overseas citizens in the UK without a visa are automatically subject to NRPF.

Immigration is a reserved matter to the UK Government, which means that the Welsh Government cannot legislate on matters relating to immigration and asylum. This includes the legislation restricting access to public funds and defining what is a 'public fund' for immigration purposes.

3.2 The Welsh Government can however, work within its devolved competencies to mitigate harm and provide support to communities, families and individuals living in Wales. Health and Social Care, Housing, and Education are devolved to the Welsh Government. Legislation and policies introduced by the Welsh Government within these competencies, and implemented by local authorities, must adhere to the sovereign legislation on Immigration and Asylum enacted by the UK Government.

3.3 The content of this policy reflects relevant statutory and regulatory documents from the UK and Welsh Governments. These are drawn from international humanitarian law. Therefore, the following pieces of legislation, policy and guidance have been considered. Readers should note that UK government policy position is subject to change and that this policy reflects government policy at the time of the review.

International Law

<p>The United Nations Convention on the Rights of the Child 1989</p>	<p>UNCRC summary-1 1.pdf</p> <p>Relevant duties include:</p> <ul style="list-style-type: none"> • Duty, Article 2 United Nations Convention on the Rights of the Child (right to non-discrimination) • Duty, Article 3 United Nations Convention on the Rights of the Child (best interests) • Duty, Article 6 United Nations Convention on the Rights of the Child (a child’s right to life, survival, and development) • Duty, Article 9 United Nations Convention on the Rights of the Child (a child’s right to live with parents if that is what is best for the child) • Duty, Article 12 United Nations Convention on the Rights of the Child (a child’s right to be heard) • Duty, Article 27 United Nations Convention on the Rights of the Child (right to a good standard of living) • Duty, Article 31 United Nations Convention on the Rights of the Child (a child’s right to play, rest, and participate in cultural activities)
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The European Convention on Human Rights 1953	European Convention on Human Rights
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UK Law and Guidance

The Human Rights Act 1998	Human Rights Act 1998
The Children Act 1989	Children Act 1989
Section 95 Immigration and Asylum Act 1999	Immigration and Asylum Act 1999

Welsh Law and Guidance incl. Vale of Glamorgan Specific Strategies

Within the Vale of Glamorgan many of the below areas are supported by the commitments within [Vale 2030](#), the Council's Corporate Plan and related Directorate Plans.

Children and young people	<p>The Wellbeing of Future Generations (Wales) Act 2015 Well-being of future generations Sub-topic GOV.WALES</p> <p>The Rights of Children and Young Persons (Wales) Measure 2011 Rights of Children and Young Persons (Wales) Measure 2011</p>
Education	<p>Free breakfasts in primary schools' guidance</p> <p>Education Maintenance Allowance (EMA) and Welsh Government Learning Grant (Further Education) schemes</p>
Housing	<p>Housing (Wales) Act 2014 Housing (Wales) Act 2014</p> <p>The Allocation of Housing and Homelessness (Eligibility)(Wales) Regulations 2014</p> <p>Discretionary Assistance Fund Eligibility</p>

	Vale of Glamorgan: Vale of Glamorgan Council Local Housing Strategy 2021-26
Migration	No Recourse to Public Funds Guidance, Welsh Government Nation of Sanctuary: Refugee and Asylum Seeker Plan EU Settlement Scheme: EU, other EEA and Swiss Citizens and their family members
Social Services	The Social Services and Wellbeing (Wales) Act 2014 Social Services and Well-being (Wales) Act 2014 See Section 21 and Section 36 (c) and 38 Social Services and Wellbeing (Wales) Act 2014] The Care and Support (Eligibility) (Wales) Regulations 2015 The Care and Support (Assessment) (Wales) Regulations 2015 Social Services Code of Practice Child first: Looking after Unaccompanied Asylum Seeking Children in Wales Briefing: supporting unaccompanied asylum-seeking children in Wales access-to-social-services-and-other-care-and-support-for-destitute-asylum-seekers-with-no-recourse-to-public-funds.pdf
Violence against women and girls, domestic abuse and sexual violence (VAWDASV)	The Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 Migrant Victims of Domestic Abuse Concession SET DV Form <i>If using the SET DV form please seek legal advice from an Immigration Advice Authority (IAA) registered service.</i> Toolkit on the Rights of VAWDASV survivors subject to

	<p><u>Immigration Control</u> <i>The Toolkit was designed for domestic abuse services to use when supporting a survivor with NRPF but includes context that is also useful and relevant for local authorities."</i></p> <p>Please note: 1) under section 37 of the SSWBW Act local authorities have a duty to meet the care and support needs of children who meet the criteria specified in the Eligibility Regulations or where it is necessary to prevent (a risk of) abuse or neglect, and 2) subsection 35 (3) (b) of the SSWBW Act places a standalone duty on local authorities to meet the care and support needs of adults if they consider it necessary to protect the adult from abuse or neglect or a risk of abuse or neglect.</p> <p>Vale of Glamorgan: Cardiff and Vale of Glamorgan Violence against Women, Domestic Abuse and Sexual Violence Strategy 2023-2028</p>
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3.5 The legislation, policies and guidance listed below detail the legal restrictions on people with NRPF and the restrictions on local authorities providing support. Some of these restrictions have exceptions to the rules. Where possible, the local authority will seek legal advice as to a person’s eligibility for support when navigating immigration and asylum law.

Section 115 Immigration and Asylum Act 1999	Definition of ‘a person subject to immigration control’
Paragraph 6 of the Immigration Rules	List of public funds for immigration purposes a person with NRPF cannot access. Migrant access to public funds, including social housing and homelessness assistance, and social care, Home Office
Immigration and Asylum Act 1971 Immigration Act 1971	Introduces the legal foundations to control migration to the UK. It establishes who has the right to enter and remain, and the conditions underpinning this.

<p>Schedule 3 of the Nationality, Immigration and Asylum Act 2002</p> <p>Nationality, Immigration and Asylum Act 2002</p>	<p>Exclusions to social services support.</p> <p>Does not apply to children. See NRPF Network guidance NRPF Network When and how to undertake a human rights assessment</p>
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Section 4: NRPF Overview

4.1 No recourse to public funds (NRPF) is a visa restriction applied as a visa condition under UK immigration law which applies to migrants who are 'subject to immigration control' and as a result of this have no entitlement to certain welfare benefits, local authority housing and homelessness assistance. For further information on how immigration status can impact access to entitlements such as these and possible exceptions, please see the recourses provided by the [NRPF Network](#).

4.2 The complex rules around NRPF and the design of the welfare system mean that an individual's status can have impact on the entire household, even where another person is entitled to benefits. More on what are known as mixed households can be seen in 4.9.

4.3 Whilst many people who have NRPF have the financial resources to sustain themselves and their dependants, the rules governing NRPF are complex and as with anyone else an individuals' circumstances can change. Job loss, reduction in hours worked, emergencies with financial costs and physical or mental ill health preventing work can cause financial hardship. If someone cannot support themselves financially, they and all their household will be unable to access public funds.

4.4 A person is 'subject to immigration control' if they fall within the definition set out in section 115(9) of the Immigration and Asylum Act 1999. People have no recourse to public funds if:

- they do not have the necessary leave to enter or remain in the UK.
- they have leave to enter or remain in the UK, but this is subject to the condition that they cannot access public funds, or,

- they have been given leave to enter or to remain on condition that they will be supported by someone who lives in the UK and will not have to claim any state benefits, sometimes called a maintenance undertaking.

4.5 Types of immigration statuses

There are many different types of immigration statuses in the UK and different groups of people who typically have NRPF applied to them can have different support needs and different rights and entitlements. Anybody who is not a UK citizen can have NRPF applied to them, and this includes people without immigration status. Also, some people must meet right to reside conditions before they can access welfare benefits. Non-UK citizens do not automatically qualify for public funds. For the purposes of this policy, the following statuses are the most relevant to NRPF, and the most used. Status should be carefully checked; an individual's eVisa gives details of their NRPF status.

British Citizenship	A British Citizen has the right to live and work in the UK permanently without any immigration restrictions. However, it is important to note that if a British child, with British citizenship as they were born in Britain, has a parent with NRPF then the child will also be subject to the NRPF restriction.
European Economic Area (EEA) national or a family member of an EEA national	<p>The EEA includes countries who are members of the European Union (EU) such as the Republic of Ireland, plus Iceland, Liechtenstein, and Norway.</p> <p>An EEA national's immigration status will determine if they have entitlement to benefits, housing assistance and other services. An EEA national or their family member will usually have one of the following types of immigration status:</p> <ul style="list-style-type: none"> • Settled status (indefinite leave to remain) granted under the EU Settlement Scheme. • Pre-settled status (5 years limited leave to remain) granted under the EU Settlement Scheme. • A pending EU Settlement Scheme application. • EU Settlement Scheme family permit. • Leave to enter for a specific purpose, such as to work,

	<p>visit, or study.</p> <p>European Economic Area (EEA) citizens who have not yet applied for EU Settlement Scheme (EUSS) status are unable to access public funds while those with pre-settled status may be able to access public funds but need to demonstrate a qualifying right to reside. There is a fuller explanation of pre-settled status here: European Economic Area (EEA) nationals and their family members</p>
Leave (permission) to enter and Leave (permission) to remain	<p>Leave (permission) to enter is usually time limited (e.g. study visa) and individuals are usually subject to NRPF. Leave to enter is often applied to family dependants who have NRPF and will be shown on an individual's eVisa. Leave to remain is also time limited and NRPF is routinely imposed. This includes individuals on work visas, study visas and visitor/tourist visas.</p>
Route to settlement	<p>The NRPF restriction can also be applied where people are on a route to settlement, such as individuals applying for a Family route to settlement, individuals who are on Hong Kong British National (Overseas) visas and individuals applying for a Private life route to settlement.</p>
Indefinite leave (permission) to remain	<p>This is sometimes referred to as settled status. Whether a person is a European Economic Area (EEA) or a non EEA citizen makes a difference to whether this is granted with or without the NRPF condition. However, most people with Indefinite Leave to Remain have recourse to public funds as if they were a UK citizen.</p>
No current leave	<p>Where a person has no current leave, it means they have no regularised or recognised status. A person may have no regularised or recognised status if:</p> <ul style="list-style-type: none"> • their leave to enter or remain is no longer valid, for example, someone visa has expired but they have remained in the UK (sometimes known as overstaying). • they have not been able to apply to renew their visa before it expired.

	<ul style="list-style-type: none"> • they are a person seeking asylum awaiting a decision on their claim for refugee status or humanitarian protection. • they are living in the UK but have not yet made any application for status. This applies particularly to European Economic Area nationals who have not applied to the EU Settlement Scheme. • their claim for asylum has been refused and they have exhausted the appeals process (sometimes known as appeals rights exhausted). In these cases, entitlement to asylum accommodation and subsistence support will end. An individual without dependants under the age of 18 can apply for section 4 support to enable them to continue to have accommodation and financial subsistence support but section 4 support is limited. See detail here: Section 4 asylum support NRPF
<p>Zambrano carers</p>	<p>A Zambrano carer is a non-EU citizen who has the right to reside in the UK because they are the primary caregiver of a British citizen child or dependent. If they were to leave the UK, it would significantly disrupt the British citizen's ability to live in the UK.</p>
<p>Dependents of refugees and refugees whose leave to remain has elapsed and not yet been reinstated.</p>	<p>This may include refugees whose initial five year leave to remain has elapsed, as they have missed the 30 day window to reapply.</p> <p>Those with refugee status who have been in prison for a serious crime may see their leave to remain revoked. This means that NRPF is applied to them but they may be unable to return to their country of origin. Such individuals will need to engage with the legal process to reinstate a form of limited leave to remain based on their Human Rights as their refugee status means that they cannot be deported.</p> <p>When someone who already has refugee status in the UK marries an overseas citizen their spouse will have NRPF and be dependant financially upon their partner, with the right to work.</p>

	When a refugee brings a non-immediate family member such as mother or sibling under 18 years old to the UK, the dependant may have NRPF and be dependant financially upon their sponsor - but with the right to work.
Asylum Seekers	Asylum seekers will have NRPF but can access accommodation and subsistence financial support through the Home Office, and can apply for free access to NHS services by completing an HC2 form, available online Low income scheme: help with NHS health costs GOV.WALES
People with Refugee or Humanitarian Protection	Those with refugee or humanitarian protection and their immediate dependants listed on their asylum claim (spouse and children) will have leave to remain in line with the refugee's leave and will have recourse to public funds. Other dependants of refugees, such as spouses married after claiming asylum, or younger siblings brought to the UK as dependants, will have Leave to enter and usually have NRPF.

4.6 How to check an individual's status

An individual's status is checked digitally via their eVisa. This is done by supplying a share code to the practitioner or authority undertaking the checks. [Check a job applicant's right to work: use their share code - GOV.UK](#) [View and prove your immigration status: get a share code - GOV.UK](#)

Some legacy documents remain in use. These include a Biometric Residence Permit (BRP) ID and/or a Visa endorsement sticker (vignette).

4.7 What are not 'public funds for immigration purposes' and can be accessed?

A person restricted by immigration control is only excluded from claiming benefits that are classed as 'public funds' for immigration purposes. Where a person with NRPF satisfies any relevant eligibility criteria, they may be able to claim some non-means tested benefits if they have previously worked and/or paid National Insurance contributions. This includes:

- Bereavement Benefit
- Widow's Benefit
- New Style Jobseeker's Allowance

- New Style Employment and Support Allowance and Contribution-based Employment and Support Allowance
- Incapacity Benefit
- Maternity Allowance
- State Pension
- Statutory Maternity Pay
- Statutory Paternity Pay
- Statutory Shared Parental Pay
- Statutory Adoption Pay
- Statutory Parental Bereavement Pay
- Statutory Sickness Pay
- Council Tax single person discount
- Education Maintenance Allowance
- Discretionary Assistance Fund Wales - emergency assistance payments are permitted, and individual assistance payments are not
- Guardian's Allowance (if in receipt of Child Benefit)
- New Style Employment and Support Allowance (ESA)
- Bereavement Support Payment
- Industrial Injuries Disablement Benefit
- Further Education (FE) funding. *However, to qualify for FE funding, a student must meet requirements relating to immigration status and length of residence in the UK.*
- Higher Education (HE) funding. *However, to qualify for home fees and student support, a student must meet requirements relating to immigration status and length of residence in the UK.*

It is important to recognise that there are other services, offers and entitlements that can be accessed by individuals and families subject to NRPF. These include [primary and secondary school education](#), [health services](#), [food banks](#) and [food pantries](#), [Healthy Start vouchers](#), baby bundles/baby banks and [fuel vouchers](#). Support to access many of these services and entitlements can be provided by [Citizens Advice](#). [Glamorgan Voluntary Services \(GVS\)](#) who are the local County Voluntary Council (CVC) are able to support and signpost to many local third sector organisations.

4.8 What are classed as 'public funds for immigration purposes' and cannot be accessed?

Paragraph 6 of the Immigration Rules excludes people 'subject to immigration control' from accessing the following public funds:

- Attendance Allowance
- Carer's Allowance

- Child Benefit
- Child Tax Credit
- Council Tax Reduction (also called Council Tax Support)
- Discretionary payment made by a council in Wales under section 1 of the Localism Act 2011 (some types of local welfare assistance), not including any payment made under [the Energy Rebate Scheme 2022](#)
- Discretionary support payment made in accordance with any regulations made under article 135 of the Welfare Reform (Northern Ireland) Order 2015
- Disability living allowance
- Domestic Rate Relief (Northern Ireland)
- Housing Benefit
- Income-based Employment and Support Allowance
- Income-based Jobseeker's Allowance
- Income Support
- Payment made from a welfare fund under the Welfare Funds (Scotland) Act 2015
- Personal Independence Payment
- Severe Disablement Allowance
- Social fund payments
- Budgeting loan
- Sure start maternity grant
- Funeral payment
- Cold weather payment
- Winter fuel payment
- State Pension Credit
- Universal Credit
- Working Tax Credit
- Bus passes (concessionary and companion bus passes)
- Funding for travel costs to and from hospital appointments (NHS funded)

[Free school meals](#) are a universal entitlement for all primary aged children in Wales. In Wales, children of both primary and secondary school age whose parents/carers are supported under Part VI of the Immigration and Asylum Act 1999, or who have no recourse to public funds, are also eligible for free school meals. This provision is not available to children who are attending a private or independent school, unless they were placed there by the local authority. Children and young people eligible for free school meals, who attend Reception class to year 11 are also eligible for the [Schools Essential Grant](#). In the Vale of Glamorgan this is administered within the Benefits Service.'

4.9 When considering recourse to public funds family members in the same household with different nationalities or different types of immigration status are referred to as mixed households. Benefit eligibility rules can be particularly complex in these situations. For example, when a person has access they will be able to claim any benefits that they would normally be entitled to. However, when they are claiming a benefit that is classed as a public fund, they will not usually be able to claim additional amounts for a partner or other members of the household who have no recourse to public funds. Further information is provided by NRPF Network here [Mixed households | NRPF](#)

Section 5: Our approach to supporting people with no recourse to public funds

5.1 The Welsh Government NRPF Guidance 2024 states “**We expect local authorities to adopt an approach of providing as much support as they can, rather than concentrating on what they cannot offer.**” Therefore, the local authority will adopt an approach of providing as much support as we can to people affected by an NRPF restriction. The local authority will embody this approach in all interventions regarding people with no recourse to public funds. All local authority staff are required to have regard to these principles and commitments and to respect and uphold them in their work. This approach will shape our strategy, training, and development and delivery of services. We will:

- Abide by our legal **duties** to provide support, safeguarding, and services
- Follow **recommendations** and proposals in statutory and good practice guidance [No recourse to public funds \(NRPF\): guidance \[HTML\] | GOV.WALES](#)
- Use our **powers** to offer additional services and fill gaps in provision
- Be **flexible, creative, and collaborative** in identifying solutions, arranging support, working **preventatively**, helping people to avoid deep poverty and destitution, and where necessary navigating pathways out of destitution through addressing the root causes of poverty and recognising the broader context of people's lives.

5.2 The following commitments set out how we will implement this approach.

- 1. Exemplify the Nation of Sanctuary** (Recommendation: Welsh Government, NRPF Guidance). The local authority adopts a welcoming approach to migrants accessing

our services, as we would with any other person. Within the Vale of Glamorgan we are committed to becoming a County of Sanctuary embodying this approach.

We will:	This means that we will always:
<p>see each person's needs before their immigration status.</p>	<ul style="list-style-type: none"> • listen to needs and concerns before exploring entitlement. • not make assumptions about people's entitlement or status. • fully assess need before reaching a decision about support. • not refuse anyone access to an assessment of need and not exclude anyone from benefits or services based on a perception that NRPF rules apply until (or unless) the Home Office confirm this.
<p>ensure that we understand and can access resources so that staff can identify what they can do to help someone in need, even if common methods of help are unavailable because of NRPF.</p>	<ul style="list-style-type: none"> • include resources for people with no recourse to public funds in service specific practice guidance and cross departmental guidance on working and referrals. • provide or commission regular and comprehensive training for staff in relevant departments. • support our staff to continue their professional development around NRPF.

We will:	This means that we will always:
do the most that we can for people, not focus on what we cannot do.	<ul style="list-style-type: none"> • maximise our offer of services and support, work collaboratively, and be creative in assisting people with no recourse to public funds (whilst abiding by any legal restrictions). • act in favour of providing support. • provide interim support to meet a child's needs whilst eligibility or need for further support is assessed, or to prevent destitution. • maximise access and availability to support schemes and mainstream services which help prevent destitution. • provide levels of support that meet essential living needs, where this is within our duty or our powers. • abide by case law by ensuring that children in receipt of financial support are supported at the welfare level. The NRPF Network offer good practice guidance when establishing a subsistence policy. NRPF Network NRPF Network Meeting needs: subsistence
ensure that our practice and interactions are trauma informed.	<ul style="list-style-type: none"> • be aware of how trauma can affect individuals, families, groups, and communities affected by a no recourse to public funds restriction (this may be because of exploitation, extreme poverty, migration,

We will:	This means that we will always:
	<p>experiences that have led to becoming a refugee, or other related issues, living in poverty, or the stress of navigating uncertain immigration status).</p> <ul style="list-style-type: none"> • ensure that people do not need to tell and retell their story multiple times to multiple professionals in the hopes of getting the right support. • consider having one point of contact or at least getting consent from the individual to share their story at a level of detail that they are comfortable with. • recognise the signs, symptoms, and impact of trauma within a developmentally appropriate context. • prevent re-traumatisation throughout each point of service provision including initial access and assessments i.e. especially when there are elements of gatekeeping or lack of knowledge and understanding. • recognise and overcome the barriers that people affected by trauma can experience. • uphold the key principles of trauma informed practice (universal, person centred, relationship focused, resilience and strengths focused, culturally responsive and inclusive).

We will:	This means that we will always:
	<ul style="list-style-type: none"> • consider the effect of intersectionality. This means that we consider all of the different levels of disadvantage and barriers a person may face, across and beyond protected characteristics, and are aware of how these may intersect. Overlapping and compounding factors such as gender, race, and disability exacerbate vulnerability and disadvantage for individuals with NRPF especially those from marginalised communities. • Trauma-Informed Wales

2. Take a preventative, strategic and cross-departmental approach to supporting people with NRPF.

We will:	This means that we will always:
<p>ensure that all departments and services within the local authority share responsibility for improving and maintaining services to people with NRPF.</p> <p>provide a range of preventative services as stated in section 15 of the Social Services and Well-being (Wales) Act 2014, with a range of intended outcomes, such as preventing or delaying the development of people's need for care and support, reducing</p>	<ul style="list-style-type: none"> • identify named officers and roles who lead on NRPF support within each of the relevant departments. • consider nominating NRPF champions in each LA department. This role may be embedded into Designated Safeguarding Leads. • encourage and support joint working and consultation across services via the Public Service Board where possible. • contribute data and share practice experience with the Wales NRPF

We will:	This means that we will always:
<p>those needs and promoting the upbringing of children by their families.</p> <p>work collaboratively across and beyond the local authority to develop approaches, improve practice, provide holistic services, and identify routes out of destitution.</p>	<p>Forum and the NRPF Network to inform recommendations made to national and UK government for policy change to reduce migrant destitution and costs to councils of delivering support to people with no recourse to public funds.</p> <ul style="list-style-type: none"> • consider the role of universal and targeted Youth and Play services in supporting children and young people in families who have NRPF. • ensure that people with NRPF are made aware of complaints procedures as any other citizen should be.

3. Work collaboratively with agencies outside of the local authority to maximise support and improve routes out of destitution.

We will:	This means that we will always:
<p>maintain up to date knowledge of voluntary sector organisations who can work with the local authority, advise us, and/or offer further support.</p> <p>maintain up to date knowledge of welfare benefits and other welfare advice services that may support people with NRPF.</p> <p>work collaboratively with Health boards and health services/projects when supporting people with NRPF.</p>	<ul style="list-style-type: none"> • seek specialist advice and guidance where it can help us to carry out local authority duties, maximise the support we offer, or signpost and refer effectively. • assist people in accessing welfare benefits and services that a person with NRPF is entitled to. • focus on working <i>with</i> external organisations, not only referring outwards.

We will:	This means that we will always:
<p>share information with NYAS on specialist advocacy services for children and young people.</p> <p>promote Violence against women, domestic abuse and sexual violence (VAWDASV) services.</p> <p>maximise support to people with NRPF via employability services and projects recognising the importance of enabling people to move away from destitution and support themselves.</p> <p>utilise national networks such as NRPF Network, NRPF Connect NRPF Connect and the Wales LA NRPF forum Wales Strategic Migration Partnership - WLGA</p> <p>work collaboratively with appropriate Health Boards and health services.</p>	<ul style="list-style-type: none"> • communicate well and effectively with organisations and services who are also engaged with people we are supporting or assessing, seeking to prevent duplication. • consider how the local authority can continue to hear, and learn from, the perspectives of people with lived experience on NRPF, enabling responsive, tailored interventions co-designed with expert communities. • work towards the development of partnerships with employment agencies, job training programs, and social enterprises to help individuals build a more sustainable livelihood. <p>recognise that the voluntary sector should act as a support to the local authority, but that their input is distinct from the statutory sector duties in relation to assessment and the provision of support. Following this voluntary sector partners may offer legal support, advocacy, social activities and social connections.</p>

4. Uphold Children’s Rights

We will:	This means that we will always:
<p>commit ourselves to upholding the rights of children, irrespective of migration status.</p> <p>ensure that local authority participation strategies are applied to all children, including those whose families have NRPF.</p>	<ul style="list-style-type: none"> • ensure that we do not discriminate against children. • always prioritise the best interests of the child. • consider the impact of our decisions on a child’s future development. • seek and listen to the wishes and feelings of the child, in an age appropriate way, and give due weight to these in any decisions that we make about them. • consider signposting or referring to advocacy services, depending on age. • maintain families and keep children with parents as far as is reasonably possible. • meet essential living needs and provide additional support, services, and connections to ensure that children have a good standard of living, access to play and leisure activities, and cultural activities and connections. • consider the holistic needs of the family to ensure that children and young people thrive in this environment. • make sure that all relevant services embed these principles in training to new and existing staff

We will:	This means that we will always:
	<p>and within service-specific pathways and practice guidance.</p> <ul style="list-style-type: none"> • adopt the “child first, migrant second” approach as set out by Welsh Government, to ensure that children’s rights are upheld. • ensure that services are needs-led and trauma-informed because we might not have the whole picture about what the child and family have been through. • utilise the Children’s Commissioner of Wales appropriately. The Children’s Commissioner will refer young people to Complaints processes and seek advocacy options.

5. Maintain Families

We will:	This means that we will always:
<p>maintain families together wherever this is in the best interests of the child</p>	<ul style="list-style-type: none"> • support children to remain with their families where there is a clear-cut opportunity to support the child but fewer available support options for the child’s parent(s) • recognise our duty of care to support and provide for the needs for all families regardless of NRPF status. • adhere to: Duty, Social Services and Wellbeing (Wales) Act 2014, Part 2 Section 6(4) and Duty, Article 9

We will:	This means that we will always:
	United Nations Convention on the Rights of the Child (a child's right to live with parents if that is what is best for the child).

6. Prevent destitution and where necessary maximise routes out of destitution

We will:	This means that we will always:
<p>recognise the important role that local authority staff play in helping people to identify and navigate routes out of destitution.</p> <p>proactively identify and promote people's access to their rights and entitlements.</p>	<ul style="list-style-type: none"> • seek to identify sustainable avenues of support which may lead to other forms of support and help to prevent long term destitution. • provide long term support to children and families where this is necessary to meet children's needs or prevent destitution. • recognise that people may be reluctant to claim benefits and access support that they are entitled to, due to fear of claiming public funds, and work to overcome this. • ensure that people are aware of their full rights and entitlements and how to access them.
<p>explore legal routes out of destitution.</p>	<ul style="list-style-type: none"> • work where possible with specialist legal agencies and immigration advisors.

We will:	This means that we will always:
	<ul style="list-style-type: none"> • support people to explore legal routes to changing their immigration status, including lifting the NRPF condition, in order to help them to avoid or move away from destitution.

7. Maximise access to support schemes and mainstream services

We will	This means that we will always:
<p>maximise access and availability to support schemes and mainstream services which help prevent destitution</p>	<ul style="list-style-type: none"> • take a broad and imaginative approach, including considering whether help can be given to access employment schemes, training, or help with job searches. Many people with NRPF have the right to work in the UK, and some may face destitution because they have lost or cannot find work and cannot claim key mainstream benefits. Employment can be a long-term route out of destitution. • signpost people to Immigration Advice Authority (IAA) registered advice on regularising immigration status. • maximise access to free school meals and the pupil essential grant to all families entitled to this.

8. Maintain our knowledge and expertise

We will:	This means that we will always:
<p>recognise the important role that local authority staff play in supporting people with NRPF, preventing destitution and helping people to identify and navigate routes out of destitution.</p>	<ul style="list-style-type: none"> • seek to identify sustainable avenues of support which may lead to other forms of support. • provide long term support to children and families where this is necessary to meet children’s needs or prevent destitution.

9. Take an anti-racist approach at all levels of our work, in line with the Antiracist Wales Action Plan

We will:	This means that we will always:
<p>ensure that leaders at all levels in our workforce model and champion antiracism, diversity, and inclusion.</p>	<ul style="list-style-type: none"> • adhere to all the commitments of the Anti-racist Wales Action Plan (2022; 2024). • prioritise anti-racism. • engage in difficult conversations that take on board people’s lived experiences. • identify systems and processes that result in different, negative outcomes for ethnic minority people and change them. • challenge racism when we see it. • commit to making unbiased decisions. • understand that anti-racism requires us to listen, however discomforting that may be. • consider the need for training in intersectional racism, unconscious bias, systemic discrimination and cultural competence.

We will:	This means that we will always:
	<ul style="list-style-type: none"> • be creative about possible solutions. • co-design solutions with ethnic minority people. • recognise the strengths of the leadership within ethnic minority communities. • ensure that our services are antiracist, accessible, and culturally appropriate.
<p>identify and work to break down barriers to social care service provision for Black, Asian and Minority Ethnic people.</p>	<ul style="list-style-type: none"> • recognise that NRPF has a disproportionate impact on Black, Asian, and Minority Ethnic people. • recognise the effect of multiple discrimination or intersectionality as affecting people with NRPF. • ensure that our services are anti-racist, accessible, and culturally responsive.
<p>become more representative of, and fully engaged with, the communities we serve.</p>	<ul style="list-style-type: none"> • ensure that all local authority provision and services are compliant with the Equality Act 2010 and the public sector equality duty. • embed positive action in recruitment, retention and progression policies and procedures (Positive action is a range of measures allowed under the Equality Act 2010.)
<p>improve access to employability programmes and support for people with NRPF</p>	<ul style="list-style-type: none"> • find effective and innovative ways of communicating our offer to different communities throughout Wales. • challenge racism in the way employability programmes are

We will:	This means that we will always:
	<p>developed, communicated and implemented.</p> <ul style="list-style-type: none"> • undertake a review of employability programmes to ensure that they are inclusive, and do not risk deepening any existing inequalities and disparities in supporting people into fair and rewarding work. • build on our existing engagement with stakeholders from ethnic minority communities to continually improve how we communicate our offers, and to increase awareness and trust.
<p>listen to and learn from the lived experiences of Black, Asian and Minority Ethnic people in our communities.</p>	<ul style="list-style-type: none"> • proactively engage with voluntary sector partners and people affected by NRPF to ensure that creative solutions to policy and service development and delivery continues to be shaped by people with diverse lived experience.
<p>embed accountability in our actions and behaviours.</p>	<ul style="list-style-type: none"> • engage with the Welsh Government external independent accountability group. • work towards engagement with the Race Disparity Evidence Unit which will measure disparities in ethnic minority outcomes across Wales. • consider how the effective implementation of this local

We will:	This means that we will always:
	authority policy may be monitored.

10. We will adhere to the requirements of the Wellbeing of Future Generations (Wales) Act 2015

We will:	This means that we will always:
<p>apply the seven well-being goals to our work with people with NRPF as they are applied to all other citizens.</p> <p>ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.</p> <p>ensure that the Wellbeing Duty sustainable development principles of long term, prevention, integration and collaboration are adopted in our work with regards to NRPF, both systemically and on an individual basis.</p>	<ul style="list-style-type: none"> • think more about the long-term, work better with people and communities and each other, look to prevent problems and take a more joined-up approach. • ensure that well-being objectives include specific actions to support the wellbeing needs of people with NRPF. • maintain up to date knowledge of voluntary sector organisations who can work with the local authority, advise us, and/or offer further. • proactively engage with voluntary sector partners and people affected by NRPF to ensure that creative solutions to policy and service development and delivery continue to be shaped by people with diverse lived experiences. • ensure that the wellbeing goal “A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances)” underpins

We will:	This means that we will always:
	support given to people with NRPF.

Section 6: Data collection

9.1 The local authority notes the Welsh Government NRPF guidance (2024) recommendation that local authorities systematically collect anonymised data relating to the individuals with NRPF who seek support.

9.2 The purpose of collecting data is to strengthen support to families with NRPF and to understand trends in terms of demographics and in terms of the types of support needed by individuals and families affected by NRPF.

9.4 Where local authorities do not have access to NRPF Connect we will work towards developing secure systems to collect data relating to individuals with NRPF who seek support. Depending on systems used school admission and free school meal data may be used to capture information regarding numbers of families with NRPF.

9.5 Data will be anonymised when being shared or being used to analyse trends, in line with local authority information sharing protocols. Data will not be anonymised when being used for support purposes.

Section 7: Practitioner Support

10.1 The No Recourse to Public Funds Network have developed a series of [practice guidance documents](#) to assist practitioners apply this in practice. Please refer to the national context included within the guidance for Wales.

Appendix B: Vale of Glamorgan Council No Recourse to Public Funds Policy: Executive Summary



Purpose

This document provides a summary of the Vale of Glamorgan Council's No Recourse to Public Funds policy. The policy sets out the Vale of Glamorgan Council's commitments and approach to people who have No Recourse to Public Funds (NRPF).

Having NRPF is a visa condition under UK immigration law that restricts access to certain welfare benefits, housing, and homelessness assistance.

This policy creates a common understanding and approach across the organisation consistent with legal requirements and best practice. It will ensure that any support and help that is needed is offered in a timely, fair and lawful way.

The policy is relevant to all who are affected by NRPF, regardless of their immigration status, and includes but is not limited to people seeking asylum.

For more detail see the complete policy.

Alignment to Legal Legislation and Strategies

Section 3: Legal and Policy Framework of the full policy.

NRPF's is a visa condition under UK immigration law. Immigration is a matter reserved to the UK Government; however, Welsh Government legislation and policy provide frameworks to safeguard and support people living in Wales who are affected by NRPF.

This policy has been developed in line with relevant international, UK and Welsh legislation, statutory guidance and best practice. The list below sets out the principal legal and policy frameworks considered. As government policy may change, this document reflects the position at the time of review. Further detail is provided in

The below table outlines pieces of international, UK and Wales wide legislation, policy and guidance that have been considered in developing the policy. Please note that government policy position is subject to change and that this policy reflects

government policy at the time of the review. **For more detail see Section 3: Legal and Policy framework of the complete policy.**

International Law	The United Nations Convention on the Rights of the Child 1989
	The European Convention on Human Rights 1953
UK Law and Guidance	The Human Rights Act 1998
	The Children Act 1989
	Section 95 Immigration and Asylum Act 1999
Welsh Law and Guidance	The Wellbeing of Future Generations (Wales) Act 2015
	The Rights of Children and Young Persons (Wales) Measure 2011
	Free breakfasts in primary schools' Statutory Guidance
	Education Maintenance Allowance (EMA) and Welsh Government Learning Grant (Further Education) schemes
	Housing (Wales) Act 2014 Housing (Wales) Act 2014
	The Allocation of Housing and Homelessness (Eligibility)(Wales) Regulations 2014
	Discretionary Assistance Fund Eligibility
	No Recourse to Public Funds Guidance
	Nation of Sanctuary: Refugee and Asylum Seeker Plan
	EU Settlement Scheme: EU, other EEA and Swiss Citizens and their family members
	The Social Services and Wellbeing (Wales) Act 2014
	The Care and Support (Eligibility) (Wales) Regulations 2015
	The Care and Support (Assessment) (Wales) Regulations 2015
	Social Services Code of Practice Child First: Looking After Unaccompanied Asylum Seeking Children in Wales
	Briefing: supporting unaccompanied asylum-seeking children in Wales
	The Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015
	Migrant Victims of Domestic Abuse Concession
	Welsh Women's Aid Toolkit: Rights of VAWDASV survivors subject to Immigration Control

What Does it Mean to Have No Recourse to Public Funds?

No recourse to public funds (NRPF) is a visa restriction applied as a visa condition under UK immigration law which **applies to migrants who are 'subject to immigration control' and because of this they have no entitlement to certain welfare benefits, local authority housing and homelessness assistance.**

The rules around NRPF are complex and the design of the welfare system means that an individual's status can have impact on the entire household, even where another person in that household is entitled to benefits.

Many people who have NRPF have the financial resources to sustain themselves and their dependants. However, the rules governing NRPF are complex and as with anyone else - an individual's circumstances can change. Changes in circumstances can lead to someone being unable to support themselves financially and if this happens for someone who has NRPF they and all their household will be unable to access public funds.

Below are some of the benefits that are and are not classed as public funds for immigration purposes and can or cannot be accessed by people who are NRPF, please note this is not an exhaustive list:

<p>Someone who has NRPF <i>and</i> satisfies any relevant eligibility criteria could access:</p> <ul style="list-style-type: none">• New Style Jobseeker's Allowance• Incapacity Benefit• Maternity Allowance• State Pension• Statutory Sickness Pay• Council Tax single person discount• Education Maintenance Allowance• New Style Employment and Support Allowance (ESA)	<p>Someone who has NRPF cannot access:</p> <ul style="list-style-type: none">• Attendance Allowance• Carer's Allowance• Child Benefit• Child Tax Credit• Disability living allowance• Housing Benefit• Income-based Employment and Support Allowance• Income-based Jobseeker's Allowance• Income Support• Personal Independence Payment• Winter fuel payment• State Pension Credit• Universal Credit• Working Tax Credit• Bus passes (concessionary and companion bus passes)
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More information on what someone who has NRPF can and cannot access is included in Section 4.7 and 4.8 of the complete policy.

Section 4 of the policy also provides more information on the most common types of immigration status typically impacted by NRPF and how to check someone's immigration status.

Our Approach to Supporting People with No Recourse to Public Funds

In line with legal duties, our powers and the recommendations in statutory and best practice guidance the Vale of Glamorgan Council will adopt an approach of providing as much support as we can to people affected by an NRPF restriction.

We will embody this approach in all our work with people with no recourse to public funds. All our staff will respect and uphold these principles and commitments in their work.

We have made ten commitments that will ensure we take forward this approach. Together we will:

1. Exemplify the Nation of Sanctuary	2. Take a preventative, strategic and cross-departmental approach to supporting people with NRPF
3. Work collaboratively with agencies outside of the local authority to maximise support and improve routes out of destitution	4. Uphold Children's Rights
5. Maintain Families	6. Prevent destitution and where necessary maximise routes out of destitution
7. Maximise access to support schemes and mainstream services	8. Maintain our knowledge and expertise
9. Take an anti-racist approach at all levels of our work, in line with the Antiracist Wales Action Plan	10. Adhere to the requirements of the Wellbeing of Future Generations (Wales) Act 2015

More information on our commitments and what this means in practice can be found in Section 5.2 of the complete policy.

Next Steps

We understand the recommendation from Welsh Government that local authorities collect anonymised data relating to people with NRPF who seek support and are working on developing our ways of working to understand local trends and support needs to inform future planning and provision.

This policy will be reviewed every two years by the Council's Internal NRPF Policy Group. The review will consider legislative changes, emerging case law, Welsh Government guidance, operational learning and feedback from partners. Any necessary amendments or improvements will be identified and implemented through this review process to ensure the policy remains lawful, effective and aligned with best practice.

DRAFT

Appendix C: Equality Impact Assessment

Including the Welsh Language and Socio-economic Duty

Please click on headings to find general guidance or section guidance with an example. You will find supporting information in appendices at the end of the guidance.

When you start to assess your proposal, arrange to meet Tim Greaves, Equality Co-ordinator, for specific guidance. Send the completed form to him for a final check and so that he can publish it on our Vale of Glamorgan equality web pages.

Please also contact Tim Greaves if you need this equality impact assessment form in a different format.

1. What are you assessing?

No Recourse to Public Funds (NRPF) Policy

2. Who is responsible?

Name	Tom Bowring	Job Title	Director of Corporate Resources
Team	Strategy and Insight Team	Directorate	Corporate Resources

3. When is the assessment being carried out?

Date of start of assessment	17/10/25
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4. Describe the proposal?

1. What is the purpose of the proposal?

This Equality Impact Assessment has been developed alongside the development of a new No Recourse to Public Funds Policy for the Vale of Glamorgan Council. The policy outlines how the local authority assesses and supports:

- Children, young people and families; and
- Adults who may have no recourse to public funds (NRPF).

Appendix C: Equality Impact Assessment

Including the Welsh Language and Socio-economic Duty

Why do you need to put it in place?

This policy provides a consistent framework for services and their staff, with the overall aim of ensuring the safety and wellbeing of people using local authority services within their communities.

The policy supports actions within the Vale of Glamorgan's County of Sanctuary Action Plan and builds upon the national commitment under the Welsh Government's Nation of Sanctuary: Refugee and Asylum Seeker Plan. The policy is also in line with our objectives in Vale 2030, in particular Objective 3 'Giving everyone a good start in life' and Objective 4 'Supporting and protecting those who need us'.

The Welsh Government NRPF Guidance 2024 states "We expect local authorities to adopt an approach of providing as much support as they can, rather than concentrating on what they cannot offer." Therefore, this local authority policy has been developed to outline the Council's approach to support those who have NRPF.

This policy is designed to eliminate discrimination by ensuring people with NRPF who are disproportionately from minority, ethnic backgrounds, receive lawful, equitable and a person-centred approach.

Do we need to commit significant resources to it (such as money or staff time)?

No, this has already been done.

What are the intended outcomes of the proposal?

The Welsh Government NRPF Guidance No recourse to public funds (NRPF) refers to a local authority No recourse to public funds pathway. This policy reflects the expectations of a local authority pathway and includes information that Welsh Government state should be included:

- an explanation to new and existing staff of how the local authority expects them to welcome and engage with migrants who access our services
- a presumption in favour of providing interim support to prevent destitution
- a commitment to upholding children's rights and maintaining families
- a guide to collecting and sharing data

The Policy sets out the local authority's commitment, principles and approach to working with and supporting people who have NRPF. It gives guidance to staff who are working with all groups of people who have NRPF and ensures that any support and help that is needed is offered in a consistent, timely, fair and lawful way.

Appendix C: Equality Impact Assessment

Including the Welsh Language and Socio-economic Duty

Who does the proposal affect?

Children, young people, families and adults who may have no recourse to public funds including migrants, women, people experiencing VAWDASV, and ethnic minority groups.

Will the proposal affect how other organisations work?

No, this policy is for the Vale of Glamorgan Council but does include reference to working collaboratively with agencies outside of the local authority to maximise support and improve routes out of destitution.

Will the proposal affect how you deliver services?

No, this policy is formalising how we currently work, supporting existing commitments and ways of working under the County of Sanctuary, Anti –Racist Wales, the Well-being Future Generations Act and more. It will be used as guidance by departments when dealing with people with NRPF ensuring that the legislation and guidance connected to dealing with people with NRPF is implemented correctly and consistently.

Will the proposal impact on other policies or practices?

No, it will be used alongside existing policies. Within the Vale of Glamorgan much of this policy is already supported by the commitments within [Vale 2030](#), the Council's Corporate Plan and related Directorate Plans.

Can you change the proposal so that it further promotes equality of opportunity and fosters good relations?

No, equality of opportunity and fostering good relations are already at the heart of this document. The content of this policy reflects relevant statutory and regulatory documents from the UK and Welsh Governments. These are drawn from international humanitarian law.

How will you achieve the proposed changes?

By sharing with local authority departments and making the policy public on the Vale of Glamorgan's website. By ensuring training is available to relevant officers.

Who will deliver the proposal?

All Vale of Glamorgan staff that may deal with people with NRPF.

Appendix C: Equality Impact Assessment Including the Welsh Language and Socio-economic Duty

How will you know whether you have achieved the proposal's purpose?

Staff will have clear guidance on dealing with people with NRPF in line with legislation ensuring we:

- Abide by our legal duties to provide support, safeguarding, and services
- Follow recommendations and proposals in statutory and good practice guidance [No recourse to public funds \(NRPF\): guidance \[HTML\] | GOV.WALES](#)
- Use our powers to offer additional services and fill gaps in provision
- Be flexible, creative, and collaborative in identifying solutions, arranging support, working preventatively, helping people to avoid deep poverty and destitution, and where necessary navigating pathways out of destitution through addressing the root causes of poverty and recognising the broader context of people's lives.

5. What evidence are you using?

The Gunning Principles, established from past court cases, can be helpful in ensuring we apply fairness in engagement and consultation:

Principle 1: Consultation must take place when the proposals are still at a formative stage. You must not have already made up your mind.

Principle 2: Sufficient reasons must be put forward to allow for intelligent consideration and response. Have people been given the information and opportunity to influence?

Principle 3: Adequate time must be given for consideration and response. Is the consultation long enough bearing in mind the circumstances?

Principle 4: The product of consultation must be conscientiously taken into account when finalising the decision.

Have you complied with the duty to engage as described above and are you sufficiently informed to proceed?

Yes	x	No	
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Appendix C: Equality Impact Assessment Including the Welsh Language and Socio-economic Duty

Engagement (with internal and external stakeholders)

This policy has been produced in consultation with local authority staff and services, voluntary sector NRPF Coalition Wales staff and services, people with lived experiences of no recourse to public funds and specialist providers across third and public sectors as part of the national work led by the Bevan Foundation to develop a policy template for local authorities in Wales. This template was used as the foundation of the Vale of Glamorgan Council's Policy to ensure the views of the stakeholders engaged in the Bevan Foundation work are reflected in our local response.

The project led by the Bevan Foundation involved 3 local authorities (including the Vale of Glamorgan Council), 6 charities/community groups, and 30 people with lived experience of NRPF. More information on the stakeholders engaged with during the Bevan Foundation work to develop the template used can be found [here](#)

Consultation (with internal and external stakeholders)

This policy has been produced in consultation with local authority staff and services, voluntary sector NRPF Coalition Wales staff and services, people with lived experiences of no recourse to public funds and specialist providers as part of the national work led by the Bevan Foundation to develop a policy template for local authorities in Wales. This template was used as the foundation of the Vale of Glamorgan Council's Policy to ensure the views of the stakeholders engaged in the Bevan Foundation work are reflected in our local response.

The final template developed by the Bevan Foundation reflected additional feedback from stakeholders at a national event held in March 2025 where attendees from a range of sectors provided comments on the draft version which were reflected where possible in the final version. More information on the event can be found [here](#).

As part of the local consultation feedback on the final draft developed by the internal NRPF policy group has been gathered via discussions at Strategic Insight Board on 6th October 2025, the Corporate Safeguarding Group on 20th October 2025 and the Senior Leadership Team on 9th December 2025.

National data and research

The NRPF Network provides data and research at the national level including data from Council's using NRPF Connect. NRPF Network publish the data on a quarterly basis and report on the collective data annually, providing UK-wide data and regional data.

Appendix C: Equality Impact Assessment

Including the Welsh Language and Socio-economic Duty

Published data reports for 2024-25 can be viewed [here](#). However, Wales data only includes figures for 2 local authorities who subscribe to NRPf Connect.

Information and research used to shape the below legislation, plans and guidance were considered where appropriate by the Bevan Foundation in developing the policy template used:

International Law:

- The United Nations Convention on the Rights of the Child 1989
- The European Convention on Human Rights 1953

UK Law and Guidance:

- The Human Rights Act 1998
- The Children Act 1989
- Section 95 Immigration and Asylum Act 1999

Welsh Law and Guidance:

- The Wellbeing of Future Generations (Wales) Act 2015
- The Rights of Children and Young Persons (Wales) Measure 2011
- Free breakfasts in primary schools' guidance
- Education Maintenance Allowance (EMA)
- Welsh Government Learning Grant (Further Education) schemes
- Housing (Wales) Act 2014
- Discretionary Assistance Fund Eligibility
- No Recourse to Public Funds Guidance, Welsh Government
- Nation of Sanctuary: Refugee and Asylum Seeker Plan
- EU Settlement Scheme: EU, other EEA and Swiss Citizens and their family members
- The Social Services and Wellbeing (Wales) Act 2014
- The Care and Support (Eligibility) (Wales) Regulations 2015

Appendix C: Equality Impact Assessment Including the Welsh Language and Socio-economic Duty

- The Care and Support (Assessment) (Wales) Regulations 2015
- Social Services Code of Practice
- Child first: Looking after Unaccompanied Asylum Seeking Children in Wales
- Briefing: supporting unaccompanied asylum-seeking children in Wales
- Access to social services and other care and support for destitute asylum seekers with no recourse to public funds.
- The Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015
- Migrant Victims of Domestic Abuse Concession
- SET DV Form
- Toolkit on the Rights of VAWDASV survivors subject to Immigration Control

Local data and research

It is widely recognised that there is limited data available on NRPF at both a national and local level. This policy includes the commitment to developing our ways of working to understand local trends and support needs to inform future planning and provision.

This policy has been based upon the templated developed by the Bevan Foundation which has been shaped by qualitative data from 6 third sector organisations and 30 people with lived experiences of NRPF.

The impact and reach of NRPF is vast, as a result there a number of related local data insights than can help provide wider information into experiences by the local population, including people who may have NRPF.

These include Census 2021 results where we can explore the population make up in the Vale of Glamorgan including gender, country of birth, migration indicator and year of arrival in UK. Community safety insights can be analysed via impact data reports produced by Safer Vale, housing insights can be explored via data collected by Housing Services and Supporting People.

More information on some of these insights can be found in the Vale of Glamorgan Council Local Housing Strategy 2021-26 and the Cardiff and Vale of Glamorgan Violence against Women, Domestic Abuse and Sexual Violence Strategy 2023-2028.

Appendix C: Equality Impact Assessment

Including the Welsh Language and Socio-economic Duty

6. How robust is the evidence?

Does it show what the impact will be (positive and negative)?

Yes, the impact will be positive as staff will have clear guidance on dealing with people with NRPF in line with legislation ensuring we:

- Abide by our legal duties to provide support, safeguarding, and services
- Follow recommendations and proposals in statutory and good practice guidance [No recourse to public funds \(NRPF\): guidance \[HTML\] | GOV.WALES](#)
- Use our powers to offer additional services and fill gaps in provision
- Be flexible, creative, and collaborative in identifying solutions, arranging support, working preventatively, helping people to avoid deep poverty and destitution, and where necessary navigating pathways out of destitution through addressing the root causes of poverty and recognising the broader context of people's lives.
- It will support a greater consistency in respect of officer practice.

What are the gaps?

Based on current legislation and available data, no significant gaps are anticipated. However, NRPF case law and Home Office policy change frequently creating potential gaps that will need to be monitored.

What will you do about this?

We will review the policy internally every two years to ensure any future gaps and changes in legislation are reflected where possible.

What monitoring data will you collect?

Welsh Government NRPF guidance (2024) recommends that local authorities systematically collect anonymised data relating to the individuals with NRPF who seek support.

The purpose of collecting data is to strengthen support to families with NRPF and to understand trends in terms of demographics and in terms of the types of support needed by individuals and families affected by NRPF.

Appendix C: Equality Impact Assessment

Including the Welsh Language and Socio-economic Duty

Data will be anonymised when being shared or being used to analyse trends, in line with local authority information sharing protocols. Data will not be anonymised when being used for support purposes.

How often will you analyse and report on this? Data will be collected on an ongoing basis and will be analysed and reported in line with departmental policies. As part of the biennial review of the policy, data collection and trends will also be analysed by the Internal NRPF Policy Group.

Where will you publish monitoring data and reports?

We will consider where will be most suitable to share this information considering the different services involved and share as appropriate. This will also be reviewed on a biennial basis.

7. Impact

Is there an impact?

Yes

If there is no impact, what is the justification for thinking this? Provide evidence.

The content of this policy reflects relevant statutory and regulatory documents from the UK and Welsh Governments. These are drawn from international humanitarian law.

If there is likely to be an impact, what is it?

Age

The policy sets out the support available for all migrants affected by NRPF with specific reference to children, young adults leaving care, including former UASC, young people and families; and adults who may have no recourse to public funds. Older migrants may face barriers in providing NI contributions for pension entitlements. The policy highlights under section 4.7 non means tested benefits that some people who are NRPF may be

Appendix C: Equality Impact Assessment Including the Welsh Language and Socio-economic Duty

eligible for if they meet the eligibility criteria and have previously worked and/or paid National Insurance contributions. This includes state pension. This provides a positive impact as the policy creates a pathway to prevent children and care leavers with NRPF from falling into destitution.

Disability

The policy highlights under section 4.7 non means tested benefits that some people who are NRPF may be eligible for if they meet the eligibility criteria and have previously worked and/or paid National Insurance contributions. This includes incapacity benefit and Industrial Injuries Disablement Benefit. All assessments carried out will be accessible for people with disabilities by offering reasonable adjustments to ensure equal participation. Support to ensure people who may be NRPF will be tailored where appropriate to ensure support meets the needs of individuals. There may be need for more favourable treatment to achieve equal outcomes for disabled people, cases are considered on an individual basis depending on the service area.

Gender reassignment, including gender identity

This policy uses gender neutral language. This policy supports commitments within the Cardiff and Vale of Glamorgan Violence against Women, Domestic Abuse and Sexual Violence Strategy 2023-2028 to help ensure equality of support recognising links between gender and NRPF.

Marriage and civil partnership (discrimination only)

The policy supports the Well-being Future Generations (Wales Act) and its 7 national well-being goals, including 'A more equal Wales.' and 'A Wales of cohesive communities.' These values are reflected within the policy. This policy also supports commitments within the Cardiff and Vale of Glamorgan Violence against Women, Domestic Abuse and Sexual Violence Strategy 2023-2028 recognising the impact of NRPF rules can have on creating possible financial dependency within married households and challenges in leaving abusive relationships. For this reason there may be occasions where different

Appendix C: Equality Impact Assessment Including the Welsh Language and Socio-economic Duty

support is required given the marital status of an individual and their related circumstances.

Pregnancy and Maternity

The policy highlights under section 4.7 non means tested benefits that some people who are NRPF may be eligible for if they meet the eligibility criteria and have previously worked and/or paid National Insurance contributions. This includes maternity allowance, statutory maternity pay, statutory paternity pay, statutory adoption pay, statutory parental bereavement pay. Welsh Government guidance notes that there may be occasions where a local authority may need to consider whether a pregnant woman with NRPF who has no other children is in need of care and support before the child is born and supported under the Social Services and Well-being (Wales) Act 2014, for this reason there may be occasions where different support is provided given the pregnancy status of an individual and their related circumstances.

Race

The policy outlines under section 9 how we will take an anti-racist approach at all levels of our work, in line with the Anti-racist Wales Action Plan, recognising that NRPF has a disproportionate impact on Black, Asian, and Minority Ethnic people.

Religion and belief

The policy supports the Well-being Future Generations (Wales Act) and its 7 national well-being goals, including 'A more equal Wales.' and 'A Wales of cohesive communities.' These values are reflected within the policy. Where identified religious support is provided to those who are assessed as NRPF.

Sex

The policy supports the Well-being Future Generations (Wales Act) and its 7 national well-being goals, including 'A more equal Wales.' and 'A Wales of cohesive communities.' These values are reflected within the policy. This policy safeguards support for people who have NRPF, which can disproportionately impact single mothers, migrant domestic

Appendix C: Equality Impact Assessment

Including the Welsh Language and Socio-economic Duty

workers, survivors of violence against women and VAWDASV helping reduce this inequality. This policy supports CEDAW: the Convention on the Elimination of all forms of Discrimination Against Women.

Sexual orientation

This policy will provide support for LGBTQ+ migrants who may have experienced persecution, be estranged from families, in need of safe placements as a result of their sexual orientation.

Socio-economic considerations

No recourse to public funds is a visa restriction which applies to migrants who are 'subject to immigration control' and because of this have no entitlement to certain welfare benefits, local authority housing and homelessness assistance. Whilst many people who have NRPF have the financial resources to sustain themselves and their dependants, the rules governing NRPF are complex and an individuals' circumstances can change. Job loss, reduction in hours worked, emergencies with financial costs and physical or mental ill health preventing work can cause financial hardship. If someone cannot support themselves financially, they and all their household will be unable to access public funds.

This policy provides a framework for services and their staff, with the overall aim of ensuring the safety and wellbeing of people using local authority services within their communities, outlining the support and entitlements available (including financial) to anyone who is NRPF. This policy directly mitigates extreme poverty and homelessness for a group known to experience socio-economic deprivation.

Welsh language

How does your proposal ensure that you are working in line with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011), to ensure the Welsh language is not treated less favourably than the English language, and that every opportunity is taken to promote the Welsh language (beyond providing services bilingually) and increase opportunities to use and learn the language in the community?

Appendix C: Equality Impact Assessment Including the Welsh Language and Socio-economic Duty

The policy supports the Well-being Future Generations (Wales Act) and its 7 national well-being goals, including 'A Wales of vibrant culture and thriving Welsh language.'. Supporting documents and guidance will be developed in multiple languages where possible and interpreters are used to ensure communication in the most appropriate language to overcome any challenges with non English or limited English speakers.

Human rights

The content of this policy reflects relevant statutory and regulatory documents from the UK and Welsh Governments. These are drawn from international humanitarian law and include links to The European Convention on Human Rights 1953 and The Human Rights Act 1998. Article 3 protection from inhumane or degrading treatment; Article 8 right to family life; Article 14 right not to be discriminated against. This policy actively prevents breaches of these obligations.

How do you know?

Explain this for each of the relevant protected characteristics as identified above.

This has been outlined in the section above.

What can be done to promote a positive impact?

Explain this for each of the relevant protected characteristics as identified above.

Any impact from this work will be positive as outlined in the sections above.

What can be done to lessen the risk of a negative impact?

Explain this for each of the relevant protected characteristics as identified above.

Any impact from this work will be positive. There are no negative impacts expected for any of the protected characteristics listed above.

Appendix C: Equality Impact Assessment Including the Welsh Language and Socio-economic Duty

Is there a need for more favourable treatment to achieve equal outcomes? (Disability only)

No

Will the impact be positive, negative or neutral?

Explain this for each of the relevant protected characteristics as identified above.

We anticipate any impact will be positive.

8. Monitoring ongoing impact

Date you will monitor progress and outcomes This will be done internally by various departments in line with current process'.

Measures and outcomes that you will monitor

Numbers of people presenting/using services that have NRPF.

Outcomes of people presenting/using services that have NRPF.

The purpose of collecting data is to strengthen support to families with NRPF and to understand trends in terms of demographics and in terms of the types of support needed by individuals and families affected by NRPF.

Date you will review implemented proposal and its impact

11/06/27

Appendix C: Equality Impact Assessment Including the Welsh Language and Socio-economic Duty

9. Further action as a result of this equality impact assessment

Possible Outcomes	Say which applies
No major change	x
Adjust the policy	
Continue the policy	x
Stop and remove the policy	

10. Outcomes and Actions

<p>Recommend actions to senior management team</p> <p>Implement Policy and disseminate to all relevant services and staff across the organisation.</p>
<p>Outcome following formal consideration of proposal by senior management team</p> <p>Implementation of the policy and dissemination.</p>

11. Important Note

Where you have identified impacts, you must detail this in your Cabinet report when seeking approval for your proposal.

12. Publication

Where will you publish your approved proposal and equality impact assessment?

The Vale of Glamorgan Website, under the 'Living' section, which already includes information on many of the connected topics such as housing and social care.

Appendix C: Equality Impact Assessment Including the Welsh Language and Socio-economic Duty

In addition to anywhere you intend to publish your approved proposal and equality impact assessment, you must send a copy to Tim Greaves, Equality Co-ordinator, to publish on the equality pages of the Vale of Glamorgan website.

13. Authorisation

Approved by (name)	Iain McMillan
Job Title (senior manager)	Head of Resource Management and Safeguarding
Date of approval	12.5.26
Date of review	