



**Joint Submission to
Public Accounts Committee**

Government fees, charges and levies
June 2025

1. Amnesty International UK ("AIUK") and Migrant Voice welcome this inquiry. Our submission concerns Home Office fees charged under powers given by sections 68-70A of the Immigration Act 2014 and the immigration health charge under powers given by section 38 of that Act ("Home Office fees"). Each of our organisations has published relevant information, analysis, experiences, and recommendations concerning these fees.¹
2. We acknowledge the Committee's specific remit to scrutinise "*the value for money – the economy, efficiency and effectiveness – of public spending and [to hold] the government and its civil servants to account for the delivery of public services.*" Accordingly, this submission concerns value for money. It does not, therefore, represent the fullness of our respective concerns and positions regarding Home Office fees, still less the functions and powers to which these relate. Insofar as we touch on the merits of Government policy, that is limited to policy that underpins the charging of Home Office fees and not the policy or policies that are pursued in respect of those functions and powers.
3. We first provide a basic background to the policy ambition and justification for Home Office fees. We then set out key principled objections to this ambition and justification. In doing so, we include some examples to provide illustration and relate each objection to the matter of 'value for money'. We set out several recommendations in a short conclusion.

Home Office fees – legislative basis, purpose, scale, etc.

4. In 2004, legislation was first passed to permit the Home Office to set fees above the cost of the function to which these relate ("above cost-recovery").² It was

¹ In April 2022, Migrant Voice published [Destroying Hopes, Dreams and Lives](#) (on the impact of visa costs and processes) identifying debt, and its consequences, as a major impact of immigration fees. Amnesty's briefing on [Immigration Fees: unfair and inefficient](#) was published in January 2025.

² Asylum and Immigration (Treatment of Claimants, etc.) Act 2004, section 42 was followed by further fees provisions in the Immigration, Asylum and Nationality Act 2006 and the UK Borders Act 2007.

stated that this would allow fees to include an additional charge above cost-recovery to represent the benefit to the individual recipient of the relevant function (e.g., processing a visa application). It was also stated that this additional charge could be returned if the individual received no benefit (e.g., if their application was refused).³ At this time, the Home Office had identified an ambition to deliver a “*self-financing, managed migration programme*.”⁴

5. In 2014, new legislation was passed to extend Home Office powers to set fees at above cost-recovery. Since 2004, and more so since 2014, the number of functions for which a fee is charged, the scale of such fees, and the degree to which these exceed cost-recovery have each generally increased significantly. In 2023, the then Minister for Immigration confirmed an aim of raising “...*sufficient funds that general taxpayers do not fund, or to a lesser extent than they would otherwise, our visa and immigration system*.”⁵ The Immigration Act 2014 expanded the factors that may be taken into account in setting fees.⁶ However, as Home Office impact assessments make clear, what is said to be the ‘benefit’ to an applicant remains an especially significant factor in justifying these fees.⁷
6. The Immigration and Nationality (Fees) Regulations 2007, SI 2007/1158 (“the 2007 Regulations”) first provided for fees at above cost-recovery. They exempted certain people (or specified immigration applications relating to them) from fees including people seeking asylum and people granted asylum,⁸ victims of domestic abuse,⁹ and children assisted by a local authority;¹⁰ and curtailed the scale of fees falling upon families by permitting certain immigration and nationality fees to be charged as a single fee for joined applications by dependent family members.¹¹
7. The Immigration and Nationality (Fees) Regulations 2018, SI 2013/330 (as amended) (“the 2018 Regulations”) now provide for fees at above cost-recovery. The provisions for fees, exemptions and waivers in the 2018 Regulations are far more numerous and complex than in 2007 – prohibitively so for any purpose of detailing these provisions in a submission such as this.¹² However, we draw attention to the development of fee waivers where a fee is shown to be

³ Further background is provided by the [House of Commons Library research paper 03/88](#), Asylum and Immigration: the 2003 Bill, 11 December 2003.

⁴ See, e.g., the summary of Government’s aims set out in the Home Affairs Committee’s Fifth Report of Session 2005-06, *Immigration Control*, HC 775, July 2006, paragraphs 46ff; and see the Home Office consultation, *Review of charges for immigration applications*, September 2004.

⁵ *Hansard* HC, delegated legislation committee, 12 July 2023 : Col 8 per Robert Jenrick, Minister for Immigration

⁶ Section 68(9), Immigration Act 2014

⁷ See, e.g., Impact Assessment for Immigration and Nationality (Fees) Regulations (Amendment) 2024, HO IA0491, 20 March 2024

⁸ Regulation 7, 2017 Fees Regulations

⁹ Regulation 8, 2017 Fees Regulations

¹⁰ Regulation 11, 2017 Fees Regulations

¹¹ Regulations 13, 19 and 20, 2017 Fees Regulations

¹² The tables provided as [visa fees transparency data](#) provide a reasonably accessible means to view the number, scale and breadth of these fees.

unaffordable to a person applying for limited leave to remain on the basis of their family or private life¹³ or unaffordable to a child applying to be registered as a British citizen;¹⁴ to the absence of any commensurate fee waiver for applications for indefinite leave to remain;¹⁵ and to the ending of single fees for joined applications by dependent family members.

8. The statutory process for setting fees is for a maximum limit for any fee to be set by a Fees Order and then regulations by which specific fees are set within that limit. The Order requires affirmation by each House of Parliament.¹⁶ The regulations may be disapproved by a negative resolution of either House.¹⁷ However, the vast number of fees and functions to which these statutory instruments relate is prohibitive for any real and effective scrutiny of these orders and regulations.¹⁸
9. Home Office Annual Report and Accounts 2023-24 indicate £2.626bn raised in Home Office fees, constituting £1.381bn above cost-recovery (or 211% of cost-recovery), a slight shortfall in respect of the target (212%), and £0.424bn above that raised in 2022-2023.¹⁹

Principled objections to the basis on which Home Office fees are set

10. As indicated above, Home Office fees are set with an ultimate ambition of making the immigration system self-financing (“the ambition”). This is explained as relieving the general taxpayer of the cost of that system and transferring the entirety of that cost to those said to benefit from it (“the justification”). There are several profound errors with this ambition and justification.

Misunderstanding of whom the immigration system is for

11. First, the ambition and justification are based on a significant misunderstanding of whom the immigration system is for. In summary, that system is established and maintained for the people of the UK to control and regulate whether and, if so, how other people may enter or stay in the UK, by what process and on what conditions.²⁰ If the people of the UK do not want an immigration system, they are clearly entitled to not have one. We do not question that the broad consensus among the people of the UK is that they want an immigration system, albeit opinions differ as to how it should operate and to what ends. In a general but

¹³ Paragraph 9.4 of Table 9 of Schedule 2 to the 2018 Fees Regulations, the application of which is by reference to an unaffordability test: see e.g., *Dzineku-Liggison & Ors v Secretary of State for the Home Department* [2020] UKUT 22 (IAC).

¹⁴ Paragraph 8 of Schedule 8 to the 2018 Fees Regulations

¹⁵ As discussed in *R (CPH) v Secretary of State for the Home Department* [2025] EWHC 848 (Admin)

¹⁶ Section 74(2)(j), Immigration Act 2014

¹⁷ Section 74(4), Immigration Act 2014

¹⁸ See fn.12

¹⁹ See Table on Fees and Charges at p192

²⁰ Part 1, Immigration Act 1971

profound sense, therefore, the immigration system is for the people of the UK, and they are its 'beneficiaries' (or whom it is intended to benefit).

12. This misunderstanding can be illustrated by hypothetical example. If the UK were to make its immigration rules so extremely restrictive that only a handful of people could ever contemplate applying for a visa, total costs of border control and immigration enforcement might or might not decrease. Yet it seems certain that these costs would remain sufficiently high to make it wholly implausible to expect them to be covered by fees charged to the few people who could contemplate applying for visas. If the people of the UK still wanted an immigration system, they would clearly have to, and reasonably expect to, pay for it.
13. This first objection concerns an aim or the presentation of delivering value for no money. The people of the UK are in effect told that they can have an immigration system for free. There are various ways in which that is not true. Some of these are identified by some of the other objections that we set out. In general, there are consequences to the people of the UK of having a bad immigration system and (including for reasons given elsewhere in this submission) Home Office fees contribute significantly to making that system bad.

General taxpayers still paying fees

14. Second, notwithstanding how it is stated, the ambition is to relieve only some not all general taxpayers of the direct cost of the system. The people charged fees to permit their coming and staying in the UK are general taxpayers. If they work, they pay income tax and national insurance contributions. If they purchase goods, they pay VAT. If they occupy property, they pay council tax. In other relevant circumstances, they pay other relevant taxes. However, in addition to the above cost-recovery element of their fees, they pay an additional tax – the immigration health charge.²¹ Some of them also pay when Home Office sponsors' fees (including the skills charge) are passed on to them. There are also British citizens paying these fees for their partners, children or other dependent family members to be with them.
15. During a recent survey of people paying Home Office fees, a common thread was the unfairness and burden of paying such high fees in addition to general taxes. One respondent said, *"It was a slap to the face when they announced the new threshold increase for family visas. It sends a strong message that the UK is not tolerant of international, intercultural, and interracial relationships. We felt penalised and targeted because of my visa situation despite the fact we are in well-paid employment and contributed to taxes and National Insurance etc. It made us*

²¹ That fee is currently 1,035 per annum or – in the case of children, people on student visas and their dependents, and those on a youth mobility scheme - £776 per annum. The charge is not incurred by people applying for and granted settlement. See the Immigration (Health Charge) Order 2015, SI 2015/792 (as amended).

feel that if one day we fell on hard times, the UK government will not have my partner's back, and certainly not mine.”²²

16. This second objection concerns value for money for the people who pay fees, particularly those in the UK (some British citizens and most of the people whose applications are successful). They are paying very large, for some crippling, sums of money. However, in the broad ‘calculation’ (we accept there is no specific calculation), much of what they pay is being discounted by presenting them as distinct from the general taxpayer when they are not. There are several further ways by which this is, at best, very poor value for their money, some of which identified in the other objections we set out.

Charging for no benefit

17. Third, notwithstanding what was said when above cost-recovery charging was first permitted, many people charged Home Office fees receive no benefit at all. People refused what they apply for receive no return of the up-lift they are charged.²³ In many cases, they pay far above the cost to administer their application for no benefit. Since 2015, when appeal rights ceased to be available save for refusal of human rights claims and on human rights grounds,²⁴ many people wrongly refused are paying far in excess for a benefit they are wrongly denied with no independent remedy available to them.²⁵
18. As reflected in information gathered by Migrant Voice, some applicants may end up paying in excess of £50,000 on their visa route due to having to pay twice for an application if the first is rejected (for example because of an error in understanding what is required by immigration rules that are very complex).²⁶
19. This third objection concerns people who are charged for something they do not receive. However, the clear absence of value for money for these fee-payers goes further. For many of them, they receive no value for any of the money they pay – whether the cost-recovery amount or the excess. Among the reasons for this is the complexity of immigration rules, which has consistently worsened over the period

²² Taken from currently unpublished data gathered for Migrant Voice’s forthcoming report on visa fees.

²³ Home Office policy guidance, *Immigration and nationality refunds policy*, version 12.0, p7 states that, “The Home Office does not refund a fee if an application is refused, due to the applicant not meeting relevant requirements...” and at pp6-7 identifies as ‘general principle’ that refunds are only to be made where there is no legal basis for retaining the fee, there is a legal obligation to return the fee, an application is withdrawn (but only in circumstances stated at p10), a second application is submitted that varies its outstanding predecessor, an incorrect fee is changed and paid, or a nationality application is made overseas to an incorrect authority. The Home Office appears to regard the charging for a benefit and not providing it to nonetheless provide a legal basis for retaining that charge.

²⁴ Section 15, Immigration Act 2014, which was fully commenced on 6 April 2015 (SI 2015/371)

²⁵ Immigration Rules, Appendix Administrative Review provides for an internal review by the Home Office of eligible immigration decisions according to rules set out in that appendix.

²⁶ Taken from currently unpublished data gathered for Migrant Voice’s forthcoming report on visa fees.

since above cost-recovery charging began.²⁷ For many, the rules are impenetrable and the administration of these rules opaque. Another aspect of this is the treatment of applications – such as the long delays experienced by some and the paucity of reasons offered for many refusals, the latter exacerbated by the cost of an administrative review that for many leads to little more than a restatement of the initially inadequate refusal reasons.²⁸

Disbenefits that are paid for

20. Fourth, the notion of ‘benefit’ in the justification given is obscure and misleading. This is because the people said to receive it – successful applicants – also experience many disbenefits from the immigration system, including ones that some of them can never have predicted or planned for. There are many types of disbenefit including:

- 20.1. Delays and errors of the system are not generally compensated for, no matter how egregious they may be.²⁹
- 20.2. The impact of changes to rules and fees, with little or no notice, may be severe. This has especial impact upon people who have already made substantial commitment in coming to the UK and need to apply to extend their stay (including in circumstances clearly envisaged by the rules at the time the person first applied to come). This can include causing people to overstay, with various further harmful consequences.³⁰
- 20.3. Making people vulnerable to further charges and costs. This includes vulnerability to sponsors passing on fees charged to them, agents and legal fees that are made necessary by the complexity and costs of the system.

²⁷ The Law Commission considered complexity of the immigration rules in 2019/20: [Simplifying the immigration rules](#). Criticism of these rules has featured in judgments of the higher courts for many years. Most recently, the Court of Appeal has, for example, observed on Appendix EU that describing it “as ‘complex’ is a polite understatement... [it is] a highly convoluted drafting approach that makes understanding it a real challenge for the most experienced lawyer, let alone lay users”: *Mustaj v Secretary of State for the Home Department* [2025] EWCA Civ 663 per Falk LJ (paragraph 12).

²⁸ The fee for administrative review of an immigration decision is £80. However, a review of a nationality decision costs £482. In either case, if the application for a review leads to a reversal of the Home Office decision refusing the original application, the review fee is refunded. As regards administrative review of immigration decisions, see Schedule 10 to the 2018 Fees Regulations.

²⁹ Each of our organisations are aware of examples of delays of several years. Other than a potentially costly application for judicial review, there is no remedy for an applicant experiencing such a delay.

³⁰ Overstaying puts someone at risk of prosecution, detention and other enforcement action to remove them from the country. It may create an additional barrier to regularising someone’s immigration status and may be relied upon as a reason to refuse subsequent applications (including from overseas): see Part 9 of the Immigration Rules (General Grounds for Refusal). These consequences of overstaying may make a person especially vulnerable to exploitation in the UK. If the person’s investment in moving to the UK – including any debt or obligation to family or another third party – is, for example, mitigated against their return, their circumstances in the UK are likely to be extremely vulnerable by reason of the risk of enforcement action and the increased barrier to their again regularising their status.

21. During a recent survey conducted by Migrant Voice, respondents warned about the impact of employers, and third parties, up-charging for basic services and costs which are already included in visa fees. This was compounded for several respondents by the absence of protection or value they received from these additional costs, with the potential for losing their current status if employers lost their sponsor licences, including for mismanagement and up-charging.³¹
22. This fourth objection concerns value for money for those whose applications are successful. It emphasises the, at best, poor value for money received by many applicants. It does so in many ways. First, there is the treatment of the application that is paid for. This includes delays and, for some successful applicants, much if not all the concerns expressed in relation to the third objection and the people who receive no benefit, including the paucity of refusals and seeking a remedy for wrong refusal. Second, there is their future experience of the immigration system. This includes unforeseen and unpredictable changes to rules and increased fees for which no preparation may be possible. It also includes the insensitivity of that system to other unforeseen and unforeseeable changes such as accident, illness or redundancy. Third, there is making people vulnerable to further charges and costs – whether by charging sponsors fees that may be passed on or by making the system so complex and expensive that applicants need pay even more money in the hope of navigating it safely.

No incentive for effective cost-management

23. Fifth, the ambition provides no incentive for the Home Office to manage its relevant costs. The department is free to pass the costs of its delays, mistakes, wasted resources, and other dysfunction on to the very people who suffer these. This compounds the previous principled objection concerning ‘benefit’. Some stark examples include:
- 23.1. The immigration rules are notoriously complex and impenetrable. From the time that above cost-recovery charging was introduced, they have consistently and rapidly become more lengthy, complicated and, in some instances, unintelligible. This is all part of the ‘benefit’ for which those charged fees are paying – including people who are wrongly inclined to make an application by reason of their (or their advisers’) confusion as to the rules and those wrongly refused by reason of the Home Office misunderstanding of its own rules.
- 23.2. Backlogs and delays in the system are a long-standing and repeating concern. However, delays of even exceptional length are not compensated for. Indeed, Home Office responses to delay tend to emphasise the discretionary nature of immigration decisions, which starkly contrasts with the scale of fees now charged to those who suffer these.

³¹ Taken from currently unpublished data gathered for Migrant Voice’s forthcoming report on visa fees.

- 23.3. Retrospective fees have drawn parliamentary attention and concern where these have been imposed to render lawful charging that was previously unlawful.³² This is, in legal terms, the most extreme example of how the general approach to Home Office fees appears to have lost all sight of the people who are charged and any obligation of fairness and justice towards them. The ambition to make the system self-financing may be an element of this problem, since the impact of passing on the cost of unlawful charges to those paying these fees may be prohibitive and the generally lax attitude to passing on costs too inviting.
24. During a recent survey of individuals affected by these fees, 48% reported having been forced into borrowing money and/or debt due to these costs. Of those who reported being forced into debt, 40% said that their debt was in the range of £2,500 to £5,000, while 11% reported debts in excess of £12,000.³³
25. This fifth objection concerns value for money for both applicants and the people of the UK. This concerns each of the other objections and relates closely to the sixth objection, though it is distinct from that. The capacity to raise fees with little effective constraint provides incentive to care less about value for money and/or economy, efficiency or effectiveness. Dysfunction, errors, oversights and injustices – if these should come to light – are at least notionally to be paid for from Home Office fees. The worst implication of this is that the people most directly harmed by dysfunction, error and injustice are the very people required to most directly pay for these; and the worse the system is, the more costly it is liable to be, and the more it charges to those claimed to be benefitting from it.

No democratic accountability

26. Sixth, the ambition takes no account (or takes advantage) of the general absence of democratic accountability towards those who are charged. These people are generally without influence over law and policy-makers, most particularly though not solely by reason of having no vote. Above cost-recovery charging is a stark example of taxation without representation. This compounds the previous principled objection concerning incentive.
27. Irish residents and lawfully resident Commonwealth citizens are permitted to vote in UK elections, including general elections. Other migrant people in the UK are without a vote in a general election. The franchise for local and other elections across the UK varies.³⁴ However, these elections do not relate to Home Office fees since these fees are set under powers granted by an Act of Parliament and the department's accountability for these fees is to Parliament.

³² See e.g., Clause 57 of the Border Security, Asylum and Immigration Bill currently before Parliament.

³³ Taken from currently unpublished data gathered for Migrant Voice's forthcoming report on visa fees.

³⁴ See House of Commons Library Research Briefing, [Who can vote in UK elections?](#), Number CBP08985, July 2024, Neil Johnston, with table at p8.

28. This sixth objection relates directly to the previous objection and concerns other objections in that the general absence of democratic accountability significantly reduces or removes the incentive to consider these other objections, let alone mitigate or remove them. As indicated in relation to, for example, the seventh objection, this has bad implications for those who have greater influence over law and policy-makers (e.g., by having a right to vote) but for whom the ambition purports (misleadingly) to free from paying.

Indirect costs to all general taxpayers

29. Seventh, the general taxpayer (i.e., all general taxpayers, not only the minority who do pay these fees) pays indirectly for the immigration system even if relieved of any of its direct cost. Some more so than others. Examples of indirect cost to the general taxpayer are given below. All that is listed concerns or includes financial costs, though there are also non-financial costs that relate to those affected:

- 29.1. The impact of the immigration system on British citizens with migrant partners, parents or other family who are dependent on them or on whom they are dependent includes indirect financial costs. The same is true for British citizens cared for by migrants who are not their family member. These include care costs (e.g., if the family member who would provide that cannot), health costs (e.g., arising from the emotional and psychological impact on wellbeing of separation and/or the strain of enduring the immigration system), and opportunity costs (e.g., arising from incapacity to work if having to care for children without the support of the other parent).
- 29.2. British employers and education providers incur costs if they cannot recruit or retain workers or students. They also incur costs if the impact of the immigration system disrupts their operations or migrant workers and students' capacity to work and study. This has bad implications for other workers and students.
- 29.3. Public services incur costs if the functioning of the immigration system causes need for these services – such as if people deprived of the care of their family member suffer increased needs for healthcare, or support from social services or the welfare system.
- 29.4. There are wider societal costs, including to public services, if the system causes homelessness or enables human exploitation (including though not limited to that by organised crime).
- 29.5. Overstaying requires specific consideration. It increases the risk of homelessness and destitution. It also creates administrative work (whether from the need for regularisation or enforcement) and so increases Home Office costs. Yet, the system creates overstaying (or the conditions for it to occur). It does so by having no care, still less guarantee,

to protect people from the consequences of changes of circumstances (including changes to rules and increased fees; also accident, illness and redundancy), notwithstanding the considerable costs it puts on them. This is because the investment many people must make to move to the UK is substantial. That includes financial, emotional, and family investment. Financial investment includes Home Office fees (including the immigration health charge), costs passed on by sponsors, agents and legal fees (the need for the latter compounded by the complexity and impenetrability of the rules). Many people are far too invested in their migration to the UK to be able to simply abandon that in the face of unforeseen and unforeseeable changes in circumstances for which they cannot prepare and to which they cannot adjust. Whereas Home Office fees are only a part of this, the injustice of creating conditions in which people are driven into overstaying (with all the bad consequences for them) is enlarged by a system that charges far in excess of cost-recovery on the basis, in significant part, that it claims to be delivering a significant benefit for these same people.

30. Migrant Voice has experience of people becoming overstayers in various circumstances, including children and adults who have lived in the UK from childhood. We have gathered information from people who have become overstayers despite paying considerable legal fees, in addition to Home Office fees, to secure advice and assistance to make their applications. People treated as overstayers, to whom we have spoken, include people born in the UK. In one case, an individual had paid £16,000 in legal fees and over £20,000 in Home Office fees yet is currently still treated as an overstayer in the UK despite having been born here.^{35 36}

31. This seventh objection concerns value for money for the people of the UK, but also for applicants who pay general taxes. It is the most challenging to quantify. However, it is liable to be the most significant of the hidden cost that falls on the people of the UK as a result of the notional ambition to excuse them from paying for the immigration system.

Conclusion

32. We acknowledge that we have not attempted to calculate the various costs to which we refer. With one exception, we have also not referred to opportunity costs. All such matters are, in principle, capable of calculation. However, what is outlined above is sufficient for our immediate purpose of showing inadequacy of

³⁵ Taken from currently unpublished data gathered for Migrant Voice's forthcoming report on visa fees.

³⁶ A child born in the UK, who resides in the UK for the first ten years of their life is entitled to be registered as a British citizen under section 1(4) of the British Nationality Act 1981. However, if a parent or carer fails to act to register the child's citizenship, the child – or the adult they become – may later be unable to establish this entitlement if, for example, they cannot secure evidence to prove their continued residence throughout these first ten years of their life.

the ambition and justification concerning Home Office fees, which in various ways do not constitute value for money. Having regard to the matters raised in this submission, including recognition of whom is paying what (not only these fees, also general taxes and other fees and costs) and the impact upon them and the immigration system itself, we make the following recommendations:

- 32.1. The policy ambition to make the immigration system self-financing should be abandoned.
- 32.2. The Government should be clear that the people of the UK are the primary ‘beneficiary’ for whom the immigration system is set up and run, and that it is a reasonable expectation that they should pay towards it.
- 32.3. Home Office fees should be significantly reduced. Further consideration and consultation should be offered as to whether to return to a position of charging fees solely at or for cost-recovery; or for significantly reducing and establishing a much tighter control over any above cost-recovery element. There should, in any event, be no cost-recovery element for delivery of any statutory or other legal entitlement.³⁷
- 32.4. It should not be possible to simply pass on Home Office costs of dysfunction, delay, error or injustice to the people who suffer from these (i.e., those charged Home Office fees). This should include that if cost-recovery is high because the service delivered is inefficient and costly, the Home Office should take responsibility for reducing those costs rather than simply passing them on.
- 32.5. The Home Office should ensure it provides a sufficient quality of service. If it is to charge any above cost-recovery element that quality of service must be commensurate with the scale of the fee and the scale of the above cost-recovery element. This should include accountability both for the immediate quality of service and outcome of an application and for the future quality of service delivered by the immigration system on the entirety of the route(s) onto which a successful applicant is thereby invited. This must include ensuring rules are understandable, predictable and fair, decision-making is prompt and provides adequate reasons for any refusal, and access to an independent judicial remedy for error and injustice. Particular consideration should be given to substantially reducing fees for further leave to remain, especially for people on a route to settlement for reasons of family migration, long residence and/or private and family life.
- 32.6. If the Home Office is to charge for a benefit, it should ensure that the benefit is delivered or, if the benefit is refused, no benefit should be paid

³⁷ Fees for statutory entitlements to British citizenship should not be set at above cost-recovery; and should be accessible to all who possess these rights. Asylum claims are not be charged for and must not be.

for. If a 'benefit' is paid for in advance, provision should be made for return of what has been paid for it. If it is not cost-effective to operate a system that charges additionally for a benefit – e.g., because the administration of a process for returning money is too costly – then a benefit should not be charged for (or not charged for before the making of the decision that will determine whether the benefit will be available).

- 32.7. Fee waivers should be accessible to those who qualify for them. This should include reducing Home Office work and related costs by ensuring evidential demands to secure a fee waiver are not excessive and treating relevant means-tested benefits provided by the State as 'passporting' (e.g., a person in receipt of universal credit should ordinarily be assumed to be incapable of affording a fee). Where waivers are to safeguard against unnecessary or disproportionate interference with private and family life and/or children's best interests these should include capacity to progress on relevant immigration routes to settlement (i.e., be available for settlement applications rather than prolonging people's experience of limited leave beyond the norm).
- 32.8. A return to single fees for joined applications (with dependent family members) should be considered.
- 32.9. The immigration health charge should be abandoned.