1. Introduction

1.1. On 22nd September 2014, a scoping paper was presented to the Public Accounts Select Committee setting out the rationale for the in depth review and providing some background information on the current situation within Lewisham and some proposed terms of reference for the review.

1.2. The purpose of this paper is to provide the committee with further information for consideration in its review. It covers:

- the policy, legislative and financial context
- demand for services both in Lewisham and in other London boroughs
- the demographic of this client group
- the approaches adopted by the council in the last six months to manage demand as part of our pilot
- recent learning as a result of the NRPF pilot
- expected future pressures and plans for managing these

1.3. The committee are asked to:

- note the content of the report and in particular the current and planned activity relating to the NRPF pilot
- agree the scope of the second evidence taking session on 10th December 2014.

2. Policy context

2.1. Lewisham’s Children and Young People’s Plan sets out the council’s vision in relation to safeguarding and promoting the wellbeing of children in Lewisham. The vision set out in the plan is:

‘Together with families, we will improve the lives and life chances of the children and young people in Lewisham’

2.2. This is underpinned by a set of commitments in terms of the culture in which the service operates. These are:

- we all work for children
• all Lewisham’s children are all of our concern
• all money is children’s money – we will make every penny count
• we intervene early and target children and families at risk of poor outcomes – including siblings
• we all have personal responsibility to integrate and share information
• there can be no resignation from the Teams Around the Child – we do not just refer on
• we have no wrong door.

2.3. The review and subsequent actions taken by the council in relation to dealing with families with NRPF have been taken in the context of balancing these policy commitments to all children in the borough against our legislative duty towards this specific client group (as set out below) and the wider duty the council has to protect public funds in a period of austerity.

3. Legislative context

3.1. No Recourse to Public Funds (NRPF) refers to people from abroad who are subject to immigration controls and as a result of this have no entitlement to welfare benefits, public housing or financial support from the Home Office.

3.2. Individuals with NRPF, whilst not eligible for public funds, might still be eligible for local authority assistance under:

• s17 of Children Act 1989 which puts a duty on all local authorities to safeguard the welfare of children in their area and to promote their upbringing by their families. To support this local authorities may provide assistance in kind, accommodation or cash.

Or,

• s21 of the National Assistance Act 1948 which confers a duty on local authorities to support with accommodation and subsistence people who are ill, disabled or an expectant or nursing mother. In the case of people with NRPF, this applies only if their need does not arise because of destitution alone.

3.3. Assistance under these acts is not defined as ‘a public fund’, hence why individuals with NRPF are not excluded from these provisions.

3.4. Local authorities have a duty to provide assistance to individuals under these acts if:

• the individual can prove they are the territorial responsibility of the council to which they are applying for assistance.

  o In the case of families, this means that the need which gave rise to the presentation to the local authority occurred within that same local authority (i.e. they became homeless there).
• they are genuinely destitute with no other means of support available to them.
  o The thresholds for destitution are high and are defined as not having the means to provide for accommodation or essential living needs.

• they are not excluded from support by schedule 3 of the nationality Schedule 3 of the Nationality Immigration and Asylum Act 2002.
  o This includes people with refugee status from abroad, a person who has nationality of another EEA state (unless to exclude them would breach their treaty rights), a person unlawfully present in the UK (if an individual does not have legal status in the UK but is in the process of seeking to regularise their stay, they are not excluded from support). However, authorities can still be compelled to provide services to individuals excluded by virtue of their immigration status where that refusal would be a breach of their human rights.

• in the case of single adults, they meet our care thresholds for support and can show their need did not arise out of destitution alone.

3.5. For those who meet these criteria, following the completion of the relevant social care assessment, individuals may be provided with accommodation, subsistence and other services assessed as required to meet their needs.

4. Financial context

4.1. Financial Outturn Report 2013/14 that was reviewed by the Committee in July 2014 highlighted that NRPF clients had created a cost pressure of £4.6m for the year. This was based on the data available within the social care system and relied on the accurate classification as people as NRPF.

4.2. Since this date, further analysis has been conducted to cleanse the data held in social care systems. As a result of this exercise it has been possible to identify further individuals being supported who in fact have NRPF. This, combined with a sharp increase in demand for services in 2013 and 2014, has significantly impacted on projected spend in this area. The current cost pressure to the local authority now stands at £6.2m and the total number of cases being supported at June 2014 (prior to the start of the pilot) was 278.

5. The growth in demand for services

5.1. The number of people with NRPF presenting to the local authority seeking support has risen dramatically in the last few years with a particularly sharp increase in 2013 prior to the review of service arrangements:

<table>
<thead>
<tr>
<th>Date</th>
<th>Number of cases accepted*</th>
<th>Annual cost of new case acceptances</th>
<th>Cumulative number of cases</th>
<th>Cumulative annual cost of cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre 2008</td>
<td>7</td>
<td>£154,000</td>
<td>7</td>
<td>£154,000</td>
</tr>
<tr>
<td>2008</td>
<td>4</td>
<td>£88,000</td>
<td>11</td>
<td>£242,000</td>
</tr>
<tr>
<td>Year</td>
<td>Number</td>
<td>Annual Cost (£)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>------</td>
<td>--------</td>
<td>----------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2009</td>
<td>11</td>
<td>242,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2010</td>
<td>9</td>
<td>198,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2011</td>
<td>15</td>
<td>330,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2012</td>
<td>56</td>
<td>1,232,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2013</td>
<td>142</td>
<td>3,124,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2014**</td>
<td>34</td>
<td>748,000</td>
<td></td>
<td></td>
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</tbody>
</table>

*All cases listed were still open at transfer to the pilot team in June 2014
**This only includes cases accepted between January 2014 and June 2014 prior to the NRPF pilot start

5.2. At its peak in January to March 2013, the council was accepting approximately 17 cases per month with the average number of acceptances between January 2013 and June 2014 at 9.7 cases per month.

5.3. If cases had continued to be accepted at this rate (and based on evidence on the infrequency of case closures), spend on this client group could have reached £15.7m by the end of the 2017/8 financial year.

<table>
<thead>
<tr>
<th>Projected number of clients</th>
<th>Projected annual cost (£)</th>
</tr>
</thead>
<tbody>
<tr>
<td>By April 2015</td>
<td>365</td>
</tr>
<tr>
<td>By April 2016</td>
<td>482</td>
</tr>
<tr>
<td>By April 2017</td>
<td>598</td>
</tr>
<tr>
<td>By April 2018</td>
<td>715</td>
</tr>
</tbody>
</table>

6. The drivers of demand

6.1. As outlined in the scoping paper to the committee, a number of national factors have contributed to rising demand for services. Whilst some of these are local factors and unique to Lewisham and neighbouring boroughs, the majority are national or international issues relating to government policy and EU case law.

- Home Office policy:
  - Over recent years, focus has been on asylum rather than managed migration. This means that resourcing, scrutiny and enforcement has been diverted away from the primary route of entry for NRPF cases.
  - 7 year child concession rule introduces in 2012, which allows individuals to apply for stay on the grounds of family life as a parent of child who lived in the UK continuously for seven years.
  - Additionally, there is an acceptance that a backlog of cases on immigration applications and appeals has significantly reduced the speed of decision making. This is related in part to the number of appeal stages built into the immigration process.

- Immigration case law:
  - Zambrano ruling which means that non EEA nationals who are the primary carer of a dependent British child have a right to reside and work if the British child would be otherwise forced to leave (but not to claim benefits).
The application of Clue v Birmingham principles introduced the concept of intention into the immigration application process.

- Legal aid changes:
  - There is now more limited access to legal aid for immigration appeal work. However, judicial review continues to attract funding. This can be used as a mechanism to challenge local authority decisions on whether to support an individual with NRPF under the Children Act or National Assistance Act.

- Welfare reform:
  - Individuals who may have previously been supported by friends or family in spare rooms no longer have this option available.
  - Policy changes affecting EEA nationals access to JSA and Housing Benefit are starting to give rise to increasing numbers seeking support.

- Local factors:
  - The establishment of NASS in 2000 which resulted in many local authorities disbanding asylum teams. With this, much of the specialist immigration knowledge, which also related to NRPF cases was lost.
  - Croydon is a hub for face to face contact for immigration applications made to the Home Office. This is likely to have an impact on demand for services in the south east of London.

7. Profile of the NRPF client group

7.1. Almost all of our current NRPF caseload are families where a woman is the primary applicant. The average age of applicants is 36 and the average number of children per family is 2.

7.2. The majority of NRPF individuals currently being supported by the local authority are Nigerian (43%) or Jamaican (39%). The remaining 18% of cases have nationalities from 24 countries across the world.

7.3. The majority 66% of those currently being supported are classified as visa overstayers, with a further 19% having being granted limited leave to remain. The remainder include illegal entrants, failed asylum seekers on reporting restrictions and those whose status is yet to be determined.

7.4. This demographic profile and immigration status of applicants in Lewisham is similar to our neighbouring boroughs.

8. NRPF across London

8.1. As identified in a recent London Councils report on growing NRPF pressures, is not easy to compare spend and caseloads on NRPF across London boroughs. This is because there is no comprehensive reporting on this type of expenditure.
and most local authorities do not have systems which enable them to robustly record the immigration status of those they are supporting.

### 8.2. NRPF Network Estimates

The NRPF network estimates that there are approximately 1,587 households with NRPF receiving local authority support at an annual cost of £25.5m. They also suggest that 75% of this cost is borne by London councils. However, the report is based on evidence from only 23 local authorities nationally.

### 8.3. Lewisham Council's Experience

Over the last six months, Lewisham council has been working closely with colleagues with responsibility for NRPF services in neighbouring boroughs to understand demand pressures felt by other boroughs and the processes being used to manage these.

### 8.4. Intelligence Gathering

The intelligence gathered from this suggests that the NRPF network figure significantly under-estimates the scale of this pressure. Across Lewisham, Lambeth, Southwark, Greenwich and Croydon alone, our data suggests that the number of cases being supported is in excess of 1,000 and that costs per case are in line with our own unit cost of £22k rather than the £16k suggested by the NRPF network report.

### 8.5. Monitoring and Reporting

Furthermore, many of the local authorities we have spoken to have only just begun to examine this cost pressure in any level of detail and as such, it is likely that once thorough investigation and more accurate recording systems are put in place, reported numbers will rise further.

### 8.6. Effective Assessment and Case Management

In terms of managing demand for these services, our engagement with other London boroughs has identified that the issues experienced by Lewisham in terms of effective assessment and case management for these groups are similar. Issues reported include:

- Capacity, skills and knowledge gaps amongst social work services to robustly assess eligibility against immigration, destitution and territory criteria.
- Ad-hoc evidence that fraud levels may be high but that robust assessment practices had not been well enough established to prove this.
- IT systems for recording information do not enable comprehensive recording of immigration status and spend.
- Difficulties procuring appropriate and affordable properties.

### 8.7. Strategies and Solutions

In response to these issues, councils have been pursuing a number of strategies including:

- Employing specialist workers located within social care departments
- Appointing fraud officers to work directly with social workers
- Appointing project leads to conduct more systematic reviews of issues and solutions
- Setting up specialist teams, for example Wandsworth have an ineligible cases team dealing with NRPF alongside other ineligible cases resulting from negative housing decisions.
- Procuring properties outside of London.
9. **Addressing demand in Lewisham**

9.1. In January 2014, a review was concluded of the NRPF assessment and case management process in Lewisham to determine how well the authority was balancing its policy, legislative and financial duties. The review sought to identify issues and define alternative approaches which could be used to address these to ensure a robust and fair assessment and case management approach was in place.

9.2. The review made a number of recommendations for improvements to processes and operational structures. The recommendations included:

- Establishing a dedicated NRPF team with responsibility for assessing eligibility for services for all new applications for support.
- More active engagement with the Home Office to manage cases and seek faster resolution to immigration applications.
- Greater integration with our fraud service for the investigation of the circumstances of new and existing cases.
- Establishing dedicated legal capacity for responding to the increasing number of threats of judicial review.
- Making better use of the specialist housing procurement expertise already established in the council to ensure that when support is provided it is in a manner which is cost effective for the local authority.

9.3. In June 2014, funding was agreed of £350k for a six month pilot to test the impact of these recommendations on managing demand and cost pressure. The funding was used to:

- Employ a dedicated team of 5 caseworkers and a manager to be responsible for all new assessment and case management.
- Second a Home Office worker to be embedded within the pilot team to conduct live status checks and ensure prompt liaison on specific cases.
- Back fill a post within our legal services department to ensure that specialist expertise could be made available to the new pilot team.
- Fund a fraud prevention officer to work specifically on dealing with investigations arising from the activity of the pilot team.
- Establish capacity in our housing procurement team to manage the sourcing of emergency and ongoing accommodation for this client group.

9.4. Alongside the new organisational capacity, the new team was supported by a number of technical and process changes for our assessment process including:

- Developing a scripted assessment process using our CRM system to ensure all cases were robustly and consistently assessed.
- The use of credit checking facilities to check the financial histories of applicants.
- A range of new processes for assessment including the use of signed declarations, waivers and more intensive checking of circumstances using data available on applicants from other council systems and Home Office records.
9.5. Additionally, new processes have been established for ongoing case management including:

- The identification of cases for which there are grounds to ask the Home Office to grant access to public funds and a process for providing transitional support for those whose application is successful.
- Establishing shared processes with the Home Office for dealing with cases where there is no application and the person is therefore excluded from all support, including our own.

10. **Quantitative analysis of the impact of the pilot**

*New presentations to the local authority*

10.1. Since the start of the pilot in June, there have been an average of 8 new cases presenting to the local authority for assistance each week (32 per month). In the first 4 ½ months, the pilot saw 145 new cases seeking support. Of these:

- 127 (88%) have been refused support at the initial triage assessment on the grounds that they did not meet all of the three eligibility criteria.
- A further 18 cases (12%) were temporarily supported whilst a more thorough investigation of their circumstances was conducted.
- 6 cases resulted in support being offered on an ongoing basis. This represents 4% of the total number presenting and is the equivalent of 1.3 acceptances per month.

10.2. We have quantified the savings associated with this approach by comparing the pilot case acceptance rate of 1.3 cases per month against the acceptance rate prior to the pilot of 9.7. Based on an average spend of £22,000 per case, spend commitments relating to new cases have reduced from c. £215,000 to c. £30,000 per month. This is a monthly saving to the authority of c. £185,000 and an annual saving of c. £2.2m.

10.3. The table below demonstrates what this might mean in terms of committed spend over the next three years:

<table>
<thead>
<tr>
<th></th>
<th>pre-pilot process</th>
<th>pilot process</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>annual cost of new cases</td>
<td>cumulative cost of new cases</td>
</tr>
<tr>
<td><strong>Year 1</strong></td>
<td>£ 2,560,800</td>
<td>£ 2,560,800</td>
</tr>
<tr>
<td><strong>Year 2</strong></td>
<td>£ 2,560,800</td>
<td>£ 5,121,600</td>
</tr>
<tr>
<td><strong>Year 3</strong></td>
<td>£ 2,560,800</td>
<td>£ 7,682,400</td>
</tr>
</tbody>
</table>
10.4. A significant amount of work on the part of both social care services and the new pilot team has been spent on the case transfer in terms of confirming the number of cases being supported and cleansing the data held on each of these cases in order to ensure that they can be appropriately reassessed for ongoing eligibility. As a result of this analysis, the pilot has identified that:

- The number of NRPF cases is actually much higher than had originally been predicted. At the time of concluding the report in January 2014, the caseload was estimated at 178. The total number of cases, following data cleansing, transferred to the new pilot team by the end of October was 278.
- There are some cases which are currently being supported for which it is possible to withdraw support:
  - 27 cases being supported by us have been granted code 1a status by the Home Office meaning that they can be transitioned away from local authority support to mainstream benefits. We are contacting all those affected by this change to invite them for a face to face appointment to help get their benefits into payment and provide advice and assistance on seeking alternative private rented sector accommodation.
  - 32 cases being supported do not now have a valid application with the Home Office and therefore the local authority must seek to terminate its arrangements for support unless human rights grounds prevent us from doing so. We are engaging directly with the Home Office family removals team to agree an approach for dealing with these cases.

10.5. If the local authority can effectively terminate support on these cases and transition either to mainstream benefits or to the control of the Home Office, the full year savings are as follows:

<table>
<thead>
<tr>
<th>Number of cases</th>
<th>Saving</th>
</tr>
</thead>
<tbody>
<tr>
<td>Code 1a</td>
<td>£594,000</td>
</tr>
<tr>
<td>No valid application</td>
<td>£704,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>£1,298,000</strong></td>
</tr>
</tbody>
</table>

10.6. Given the complexities with terminating support, it is likely to be February/March that savings can be delivered meaning a full year impact will not be felt until the financial year 2015/16.

10.7. Additionally, we have conducted 71 reassessments of existing NRPF cases which have been transferred to the pilot team, resulting in a decision to terminate support on 24 cases (approx. 33%). The decision to terminate support on these cases is either because: other sources of income have been identified, the client has been granted recourse to public funds or because their immigration status has been resolved. The full year financial impact for closing these cases is expected to
be c.£500k. However, given that cases were not terminated until Autumn 2014, we would expect to deliver approximately a half year impact on these cases by the end of the financial year.

10.8. Therefore, our overall estimate is therefore that the NRPF pilot will result in a plateau of spend for 2014/15, with significant budget reductions starting to be evident from 2015/16 onwards.

11. Qualitative analysis of the impact of the pilot

11.1. Whilst the budgetary concerns caused by rising demand for this service are clearly a priority for the authority, they were not only driver for this new approach. Indeed alongside ensuring the local authority was conducting assessments robustly, the pilot also sought to introduce processes which were fair and equitable ensuring that all applicants seeking support from the local authority went through the same assessment approach and that the decisions taken by the local authority were logical and defendable if challenged.

11.2. Whilst there has been a great deal of challenge to the decision making process during the pilot from advocates, MPs and solicitors, the council's legal team has been able to successfully respond to every challenge presented to us. This includes four threats of judicial review and six pre-protocol actions. To date, none of these actions have progressed to full judicial review.

11.3. In order to demonstrate the approach of the pilot and the impact at an individual case level, three case studies are included below:

- Mrs A and her husband and three children presented to the council in January 2014 saying that they needed support from the local authority whilst they sought to regularise their stay with the Home Office. The family was placed in bed and breakfast accommodation in South East London. When the pilot team took over the case in August, Mrs A was invited in for a reassessment to check her family's progress with their claim and to review their living arrangements. At the reassessment, the family indicated again to their caseworker that they were still actively seeking to regularise their stay. Our Home Office worker was able to conduct a live check following the appointment and identified that the family did not in fact have an application to stay and had not been in contact with the Home Office for a number of years. The caseworker for this family has been working directly with children's social care to conduct the relevant closing assessments and we are liaising directly with the Home Office's family removals team to agree an approach for ensuring that the family are given the appropriate options in terms of a supported return home. Support to Mrs A and her family costs the local authority c. £2,600 per month.

- Ms B and her two children presented to the local authority in July and she was assessed by one of the caseworkers in the new pilot team. Ms B said that she had been living at an address in Lewisham and had no support networks as her partner moved back to Nigeria a number of years ago and has not been supporting financially. The caseworker listened to the family history and then made a number of checks on benefit, council tax and housing systems. The
caseworker was able to ascertain that the property Ms B claimed to have lived in was in fact the subject of eviction proceedings as the tenant had been found to be subletting to Ms B’s partner. The individual sub-letting the property also gave a signed statement that Ms B had never been present at the property. This evidence was presented to Ms B as grounds for believing her application was fraudulent. The local authority did not support in this case. We have had no further contact from Ms B since she was given her negative decision.

- Ms C has been attempting to regularise her stay with the Home Office for a number of years. She had been granted code 1 status which enables her to work but not to access benefits. Whilst Ms C has had some short term jobs, these have not been enough to sustain herself and her two children. She was accepted by the social care department in April this year for financial and housing support. In July 2014, the pilot team identified that Ms C might be eligible for code 1a status which would enable her to access mainstream benefits whilst she seeks to regularise her stay. Ms C and her caseworker jointly made the application and the team’s Home Office worker checked regularly on the status of the claim. As soon as this was processed, the caseworker invited Ms C to an appointment to discuss the steps she needed to take to get her benefits into payment, find housing and look for work. Ms C and her caseworker have made the claim for benefits and Ms C has been given advice regarding looking of rented accommodation in London. Ms C’s longer term ambition is to be a nurse but she is looking at lots of different jobs via employment agencies to get her on her feet. Support to Ms C and her family cost the local authority c. £2,400 per month.

12. Learning to date

12.1. The current pilot is due to end at the end of November 2014. As part of this process, a thorough evaluation of the impact of the approach is being conducted, including analysing the impact of various interventions on managing demand. Some of the emerging lessons have already been identified and will be used help to shape recommendations on the future operating model for this service:

Assessment & Eligibility

- Splitting eligibility assessment (now the responsibility of the pilot team) and need assessment (which continues to be the responsibility of social care) has been effective. Feedback from social work managers is that when a single individual has been asked to do both in a single assessment (as was the case prior to the pilot), the difficulty balancing both elements of assessment tended to make need outweigh eligibility. This goes some way to explaining the higher number of acceptances prior to the start of the pilot.
- Conducting robust assessments relies on the collection and collation of a range of complex information and requires skill and expert immigration knowledge. An effective team must have officers with the confidence to interpret information in a logical way, make reasoned decisions and have the tenacity to stand by decisions once they have been made.
• Having a small dedicated team enables trends and patterns in the stories being presented to be quickly identified and tackled. This is something which is much harder when the function is spread across multiple officers in a wider service.
• Immigration law is complex and rapidly changing, this means that the service, its policies and processes must be flexible and responsive to new demands.

Case review & termination

• The process for putting in place a robust front-door whilst not easy has been more straightforward than the process for terminating cases we have already supported for a number of years. Particularly for cases which have been granted access to benefits, getting in place arrangements for a smooth transition to benefits, including finding suitable accommodation has proved challenging. This is particularly important because, unless suitable alternatives can be put in place, the service risks bouncing individuals from social services support to housing support which merely moves the pressure around the council rather than addressing the root cause.
• The role of the seconded Home Office worker has been particularly important in the case review process, helping us to identify changes in circumstances quickly and working jointly to agree appropriate solutions. The speed at which these cases are resolved would be significantly reduced if we are not able to secure an extension to our current arrangements.

Housing and support

• Housing is the main driver for individuals seeking support with many applicants presenting originally to our Housing Options Centre seeking support before being signposted to the NRPF team.
• Finding suitable housing within the London area for this client group is extremely difficult and when it can be sourced is costly for the local authority. The current average cost of accommodation monthly for NRPF clients is c.£1,500 per month. This is significantly higher than both the inner and outer London LHA rates (which are £1020 and £784 respectively). This makes finding landlords who are willing to continue to accept our clients if they are granted access to benefits very difficult within London.

Working in partnership

• Drawing in the skills and expertise of various council departments to support this process has given the pilot the focus and support that it needs to be successful. Procurement via our housing service has significantly reduced the costs of accommodation and has enabled us to procure accommodation which is administratively cheaper (i.e. with inclusive utility bills and repairs). We are working closely with this team to try and transition cases where we will continue to support for the foreseeable future from current accommodation to more cost effective alternatives.
• There is significant overlap between Lewisham and its neighbouring boroughs in terms of the issues experienced and number of cases being supported. Lewisham, Greenwich, Lambeth and Southwark councils have all been working closely together over the past few months to share approaches and possible
solutions. There is an appetite across these other boroughs to implement an approach similar to the Lewisham pilot and to explore opportunities for delivering this service jointly. In particular, this would help to reduce the number of re-presentations between local authorities and improve the richness of data held on individuals presenting, meaning that trends and patterns at a regional level can be more easily identified.

13. **Future plans**

13.1. A full evaluation of the impact of the NRPF pilot will be compiled before January 2014 and a decision will be taken as to whether and how to extend or mainstream the pilot.

13.2. The work of the pilot team will continue to be to effectively manage the front-door. However, now that transition is almost complete, there will be a renewed emphasis on dealing with the case review process to seek to reduce existing caseloads by dealing with cases who are no longer eligible for our support.

13.3. There will also be further focus on seeking to move those who we are likely to be supporting longer term to more affordable accommodation which is sustainable in the longer term if families are granted leave to remain and access to benefits.

13.4. The council recently submitted a bid to the DCLG for funding as part of its counter fraud initiative to develop a shared process and system across 5 boroughs (ourselves, Lambeth, Southwark, Greenwich and Bromley) to create a more integrated approach for dealing with NRPF cases. Our discussions have been based on developing a model similar to that adopted in Lewisham. We hope to use this as the basis to explore whether a shared service model could be effective for this type of service.

14. **Legal Implications**

14.1. The legal context is set out in the main body of the report.