

Scottish Asylum Right to Work Pilot Proposal

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1. Introduction

1.1 Policy context

The Scottish Government has long been clear that the current UK immigration system does not align with the values of dignity, fairness and respect that we believe should underpin policies regarding migration, asylum and refugee integration. Scottish Ministers have repeatedly called for a new approach to migration that is needs-based, delivers positive outcomes, and which supports fair work, protects workers' rights, pay, access to employment and prevents exploitation and abuse.

It has always been the Scottish Government's position that those seeking asylum should be supported to begin rebuilding their lives from the day they arrive in Scotland, and that the right protections and services are there to support people seeking asylum to access employment, to support themselves and their families, and to maintain and develop their skills.

In March 2024 we published an updated version of our New Scots Refugee Integration Strategy Delivery Plan, just over ten years after the original publication in 2013. This Plan reaffirms our commitment to ensuring that Scotland is a fair and equal country, where people's rights are respected and protected. One of the key principles of this Strategy is working collaboratively with stakeholders, to coordinate all of our efforts and ensure that we are achieving the best outcomes possible. The development of the Strategy – in addition to this pilot proposal – have benefitted from the invaluable insight and expertise of those working to support asylum and refugee integration.

In addition to seeking an approach to immigration policy which is humane and needs based, Scottish Ministers have also been clear that current policy does not acknowledge Scotland's distinct demographic or economic needs; statistics from the National Records of Scotland show that migration is the only factor sustaining Scotland's current population growth. As well as sustaining our overall population levels, in-migration is also typically from those of working age, which helps address population ageing and supports the labour market.

Our [Population Strategy](#), published in 2021, sets out our ambition to ensure that Scotland is as attractive and welcoming a country as possible, so that we can attract people who can make a positive contribution to our economy, communities and public services, as well as supporting people who need our help to make a new life in Scotland.

1.2 The Scottish Government's vision

Outcome 3 of the New Scots Strategy is that New Scots 'understand their rights, responsibilities and entitlements in Scotland and are able to exercise these to pursue full and independent lives. New Scots can pursue their ambitions through education, employment, culture and leisure activities in diverse communities'. This is supported by several actions to support people into employment including:

- Working with Scottish professional bodies to understand and promote recognition pathways for industries and identified sectors.
- Improving and enhancing awareness of, and access to, employability support for New Scots.
- Establishing channels of support for New Scots considering or actively pursuing entrepreneurship, through our enterprise agencies and entrepreneurial ecosystem.
- Developing proposals for a Scottish Right to Work pilot for people seeking asylum, to be submitted for consideration to the UK Government.

This proposal addresses the final bullet above.

1.3 Broader positioning and evidence on the right to work

In April 2024, the previous UK Parliament's All-Party Parliamentary Group (APPG) on Migration and the APPG on Poverty published a joint report on the [Effects of UK Immigration, Asylum and Refugee Policy on Poverty](#). The report stated that the UK's asylum support is "destitution by design" and recommended that people seeking asylum should have the right to work after six months.

This is further evidenced by a survey recently undertaken by Heriot-Watt University and the Joseph Rountree Foundation, which found that 97% of respondents with No Recourse to Public Funds/Restricted Eligibility and who were accessing Fair Way support¹ would be classed as destitute at the time of responding to the survey².

A [written question](#) was tabled in the Commons by Labour MP Abtissam Mohamed on 21 October requesting whether the UK Government would take steps to allow those seeking asylum to work after six months. The Minister for Border Security and Asylum, Dame Angela Eagle MP, responded that the policy of restricting employment to an Immigration Salary List is "based on expert advice from the independent Migration Advisory Committee" (MAC), with no plans to change this. However, the MAC stated in their 2021 Annual Report that "the original reasoning behind this restriction does not seem to be particularly coherent". The paper sets out a number of elements of the pilot design where the request is that the UK Government works with us to establish mutually acceptable parameters for the pilot.

1.4 Expert Advisory Group on Migration & Population report

In December 2023, the Scottish Government's independent Expert Advisory Group on Migration and Population (EAG) published the report [Asylum Seekers - extending the right to work: evaluation, analysis, and policy options](#). The report sets out analysis and policy options which would extend the right to work to people seeking asylum in Scotland, and reviews UK Government policy on this topic. Drawing on international case studies as well as existing evidence from academic and third sector studies in the UK, the report explores the consequences of exclusion from the

¹ Fair Way Scotland is a partnership of third sector organisations seeking to prevent and mitigate homelessness and destitution among those with No Recourse to Public Funds (NRPF) or other restricted eligibility (RE) for statutory supports.

² [Destitution by Design: righting the wrongs of UK immigration policy in Scotland — Heriot-Watt Research Portal \(hw.ac.uk\)](#)

labour market for people seeking asylums' well-being and on integration outcomes in both the longer and more immediate term.

The report set out a range of recommendations for Scottish Government, such as:

- Consider how to exercise key devolved policy levers to support a proposed change e.g. in relation to employability, skills, education and training.
- Create a clear and simplified system with guidance for employers and prospective employees.
- Ensure increased employability is supported through tailored services, integration into mainstream support and by tackling structural barriers, inequalities and discrimination.
- Ensure that any proposal reflects the need to ensure individuals do not lose access to financial support/housing focusing on preventing in-work poverty and homelessness.
- Include the appropriate range of stakeholders in designing policy, learn from existing experience and ensure that responsibilities for implementation are properly resourced.
- Where an individual receives a positive decision in relation to their asylum application, right to work should provide pathways to settlement and mitigate the risks around temporary status, in order to aid their social integration.

In line with the MAC recommendation for the UK Government to review its policy on allowing people seeking asylum to work more easily³, Scottish Ministers committed to work closely with stakeholders to develop a pilot proposal to submit to the Home Office for consideration, underpinned by the findings of the EAG report. We ask that the Home Office engage constructively with us to trial these new, innovative policy approaches which may have broader applicability across the rest of the UK.

The EAG report also includes a chapter on economic impacts, provided by the National Institute for Economic and Social Research (NIESR). This modelling shows that allowing people seeking asylum the right to work in Scotland could add £30 million per year to the Scottish economy, or around £16 million per year if allowed after six months. This builds on a study conducted by NIESR in 2023, whereby the modelling indicated that allowing right to work would increase the GDP of the UK by £1.6 billion.⁴

1.5 Stakeholder engagement

The Scottish Government has worked collaboratively throughout the development of this pilot proposal, convening a Working Group constituted of representatives from both local authorities and key third sector partners. Furthermore, a separate engagement session with employers and a lived experience session with asylum seekers were undertaken. This pilot proposal was developed iteratively over the course of four Working Group meetings over Summer 2024, with members afforded the opportunity to feed in both verbally and in writing.

³ [Migration Advisory Committee \(2021\), Annual Report](#)

⁴ [The Economic and Social Impacts of Lifting Work Restrictions on People Seeking Asylum - NIESR](#)

The organisations who have participated in the stakeholder Working Group are as follows:

- Inverclyde Council
- Aberdeenshire Council
- Glasgow City Council
- Aberdeen City Council
- COSLA
- Scottish Refugee Council (SRC)
- Bridges Programme
- Govan Community Project
- NACCOM (No Accommodation Network)
- No Recourse North East Partnership
- Grampian Regional Equality Council (GREC)
- Refugee Sanctuary Scotland
- Asylum Support Appeals Project (ASAP)
- Institute of Social Policy, Housing and Equalities Research (I-SPHERE), Heriot-Watt University
- Glasgow Clyde College
- Skills Development Scotland
- Scottish Credit and Qualifications Framework Partnership (SCQFP)

1.6 What will the pilot test?

This pilot proposal seeks to test the proposition that granting people seeking asylum the right to work from an earlier stage - and removing restrictions on the types of employment they can undertake – will have:

- a positive impact on them, their families and the communities they reside in, for example in relation to reduced destitution and material deprivation, improved health and wellbeing, and integration into the wider community;
- makes a positive contribution to the economy; and
- reduces the cost and demand on public services such as social security and health services

Another key objective would be to develop an understanding of any unintended consequences which arise and how these might be mitigated. Additionally, through the delivery of the wrap-around support provision for pilot participants, this will improve our evidence base on the extent to which this achieves positive outcomes for those seeking asylum. The exact shape of this wrap-around support provision would require agreement between delivery partners in advance of delivery, but we recognise that there would need to be a level of support provided in order to realise the broader economic benefits. Lessons learned from this pilot will therefore help inform our understanding of the scalability of this policy change at a UK-wide level and the level of resource required to ensure asylum seekers seeking to enter the labour market are suitably supported. It is anticipated that this in turn will deliver longer-term benefits for the economy and public services.

1.7 Ask of the UK Government

We are requesting that the UK Government reviews this proposal and agrees to engage with Scottish Government to consider its feasibility. This is expected to result in further refinement of the proposal before a final decision is taken by the Home Secretary to grant the Scottish Government permission to deliver a pilot. This may require legislative changes and a detailed memorandum of understanding would need to be agreed prior to commencement.

2. Pilot Design

This paper outlines initial pilot design based on feedback received from stakeholders throughout the engagement process. While consensus was reached within the Working Group on a range of practical and pragmatic parameters, there also remains a number of key areas for exploration and decision prior to operationalisation of the pilot. The design elements below are therefore intended to outline areas where consensus was clear, and identify areas which require further exploration with the UK Government and other partners.

2.1 Pilot scale and geography

As set out earlier in this proposal, the Scottish Government's vision is that the opportunity to work should be granted to all people seeking asylum across Scotland. While we would support wider system change, for example for all of Scotland being used as a pilot site to test a change in UK Government policy, we recognise the benefits of delivering a proportionate pilot scheme to first test our overarching policy ambition. In this case, this comprises a range of smaller geographical areas within Scotland which contain populations of people seeking asylum, but with different local factors such as employment opportunities, rurality versus urban environments, and differing potential support structures which could be applied in support of any local scheme. In that scenario, the Working Group noted the importance of the pilot taking place across at least one urban and one rural setting in order to generate more varied lessons with regards to delivery in differing localities. It was agreed by the Working Group that Glasgow City Council at a minimum should participate in the pilot, as the location in Scotland with the largest asylum-seeking population. However, it is expected that the pilot will support people living within any agreed pilot areas. People seeking asylum living in Home Office provided accommodation are accommodated on a no-choice basis, and people are not able to choose to relocate.

A rural pilot location was not explicitly agreed, however it was highlighted that additional barriers would need to be considered when establishing rural pilot area boundaries, for example with regards to existing transport links and the distance between housing and employment opportunities. In order to address these challenges, Travel to Work Areas (TTWA) could be considered as a geographical unit within which to operate the pilot. TTWAs are commuter areas that do not necessarily align to local authority boundaries, whereby the population would generally take up employment in a larger town or conurbation nearby, as well as acting as more general 'activity spaces' within which people are likely to carry out most of their day-to-day activities, such as accessing public services.

With regards to the scale of the pilot, the number of people who participate needs to be large enough to generate meaningful results through the evaluation process, so that lessons learned will serve as a robust evidence base to inform the future development of asylum right to work policies. It is proposed that people seeking asylum who are accepted onto the pilot should retain their right to work until they receive a decision on their asylum claim, to provide as much stability and continuity as possible, which employers have highlighted can be a key barrier with regards to employment. Additionally, as part of the pilot design, an exit strategy will be developed to support pilot participants.

Areas for further exploration

- The number of participants that can be supported on an initial pilot should be agreed with the UK Government. This will help to determine the number of pilot areas that should be included.

2.2 Eligibility

The Working Group was unanimous that the pilot should take as inclusive an approach as possible - keeping eligibility criteria to a minimum - in order to further build the evidence base regarding the experiences of different cohorts of people seeking asylum. A range of views were expressed by the Working Group and people with lived experience on how quickly someone arriving in the UK would be ready to work. Some felt that it should be granted immediately or after six months, while others felt it would vary depending on each individual's circumstances.

Our proposal is that the prospective pilot would accept participants once they have been waiting six months or more for a decision on their asylum claim. This threshold aligns to previous Labour Party positioning in the UK Parliament⁵, as well as to wider EU legislation, whereby a Directive was recently agreed to reduce the right to work threshold for people seeking asylum from nine months to six months⁶.

Given there is a requirement for the pilot to be operational within the current UK immigration framework, the Home Office would maintain full responsibility for reviewing and processing asylum claims. An agreement would need to be established at the point of delivery on how suitable pilot participants are identified, and how this data would subsequently be shared with the Scottish Government and other partners as necessary.

2.3 Employment opportunities and partner employers

Recognising the breadth of prior skills and experience which pilot participants might possess, it is proposed that the pilot should be open to all sectors so as not to limit employment prospects.

⁵ [Asylum Seeker Employment and the Cost of Living - Hansard - UK Parliament](#)

⁶ [Directive - EU - 2024/1346](#)

In reviewing approaches to asylum right to work internationally, the EAG report found that there is no evidence to support limiting employment opportunities to where there are shortages, which was proven to be “ill-conceived with no clear benefits to either the sectors involved or the people seeking asylum themselves”⁷ when trialled in Australia; it has since been scrapped by the Australian Government. As noted earlier in this pilot proposal, reform of this policy is also supported by the MAC, noting that “the original reasoning behind this restriction does not seem to be particularly coherent”.⁸

The pilot would not seek to offer a direct matching service between participants and employers, in order not to restrict pilot participants to a particular list of job roles; however, the pilot would seek to ensure that prior skills and experiences are recognised using language accessible to the individual and employers. In Scotland there is already a developed process for informally benchmarking skills, experience and qualifications through the National Qualifications Framework.

In order to safeguard pilot participants’ rights and minimise the risk of exploitation, employment opportunities should align with Fair Work principles and the UK legal employment framework, for example the recently announced Employment Rights Bill. A mixture of full and part-time contracts should be encouraged to make the pilot more accessible to those with caring responsibilities or disabilities, while also providing further insight on how these cohorts access employment opportunities.

As the EAG report sets out, the current system is complex and confusing for employers, which can be particularly disincentivising for smaller organisations without a distinct HR function, in addition to increasing the potential for the exploitation of employees. A key role for the Scottish Government in operationalising the pilot would therefore be developing robust and clear guidance to explain both employer and employee roles and responsibilities, which the EAG report suggests could be taken forward in collaboration with trade unions.

Areas for further exploration

- Specific requirements with regards to data collection would be agreed once a prospective pilot model is finalised, and communicated clearly to delivery partners. Any required data gathering would look to minimise bureaucracy as far as possible.

3. Pilot Delivery

3.1 Support for pilot participants

A fundamental principle underpinning the pilot is that participants should not be financially worse off, which will require some degree of support while they transition from unemployment to the desired outcome of being more financially stable and independent, and able to make a positive economic contribution. As a minimum, this should initially involve the provision of asylum accommodation being maintained,

⁷ [Asylum Seekers - Extending the Right to Work: evaluation, analysis, and policy options](#), page 5

⁸ [Migration Advisory Committee 2021, Annual Report](#)

until the individual has been in stable employment for a suitable length of time to be able to transition to local authority or private housing. In terms of ongoing asylum support, the EAG suggest a number of possible options drawn from international case studies; for example offering an allowable earned income before support is withdrawn, or a staggered or top-up payment in order to supplement lower incomes. Both of these measures currently feature to some extent within the UK benefits system.

In addition to the continuation of some level of asylum support, stakeholders have been clear that a flexible, wrap-around provision of bespoke services will be crucial to ensure people seeking asylum are effectively supported and that the desired pilot outcomes are achieved. At the outset of the pilot, the Scottish Government will develop guidance for host local delivery partners to establish standards with regards to the support offer requirements. Pilot areas and local lead delivery partners – with support from the Scottish Government where appropriate – will then be responsible for developing this package of support. This may involve working with a range of third-sector organisations within their local area, as well as larger national-level bodies; for example the Scottish Credit and Qualifications Framework Partnership in terms of skills recognition support for employers and colleges with experience in ESOL delivery, to ensure that the conditions are created to enable people to become ready for work.

We know from stakeholders that New Scots employability pathways are complex and that many of those in Scotland with the right to work are not currently employed. The employability support as part of the pilot is intended to target this, while we will also seek to gather further data and evidence with regards to the specific challenges those seeking asylum have in finding employment.

In the first instance, this support could take the form of a detailed information pack on the scheme and how it will operate within that locality. Some of the key features of this support will be to offer employability, skills recognition using informal benchmarking, and language learning to participants, in order to increase the likelihood of them finding suitable employment and to assist their wider integration. Further support such as immigration advice, accommodation support and advice on their financial support entitlement will also be considered. It is important that the support package draws upon existing expertise in each pilot area.

While the pilot would, within its delivery model, ensure a minimum level of support is in place, host pilot areas may choose to deliver a more extensive level of support where resource and capacity enables them to do so. This would facilitate more detailed findings in terms of the pilot evaluation, by assessing what outcomes varying levels of support help to achieve. It is proposed that the local lead delivery partner where the individual lives will be responsible for providing support to pilot participants.

Given that the scope and scale would need to be agreed with the UK Government, costings for delivering the pilot would be undertaken at this stage in order to determine the level of funding required.

Areas for further exploration

- Further engagement with the Home Office is required to agree the level of support which will be maintained for participants during the duration of the pilot.

3.2 Role for Scottish Government in pilot delivery

Successful delivery of the pilot will require close working between UK Government, Scottish Government, Scottish local authorities, third sector partners and employers. There are several delivery models that can be explored, which require further scoping based on the role that different organisations are able to play.

The Scottish Government would have primary oversight of the pilot and act as a key point of liaison to facilitate delivery between relevant partners, which may include:

- Establishing appropriate governance arrangements and facilitating engagement and information sharing between employers, delivery partners and the UK Government.
- Working with partners to develop clear roles and responsibilities - alongside robust guidance - for employers and people seeking asylum.
- Developing guidance on the minimum level of support for participants.
- Engaging with the Home Office to facilitate effective delivery of the pilot, including ensuring appropriate legislation is in place to ensure deliverability of the pilot.
- Working with partners to monitor and evaluate the pilot.

Additionally, prior to the launch of the pilot, the Scottish Government, working closely with delivery partners, could host information sessions for employers to present the pilot and offer the opportunity to ask questions. This would help ensure they understand their role in the scheme and may address one of the recommendations in the EAG report, which focuses on working with employers to tackle inequalities and discrimination and to address potential barriers in the labour market.

The Scottish Government would also consider any support that partners might require to ensure that the relevant monitoring procedures are undertaken with regards to the pilot.

4. Pilot Evaluation

It is proposed that a pre/post evaluation of the pilot is conducted to assess whether the pilot delivers its intended objectives and benefits, as well as to explore any process-related issues. This evaluation design would establish a baseline before launch of the pilot, against which impact and changes can be assessed once the pilot has been operational for twelve months. It is proposed that Scottish Government analysts will support the development of monitoring and evaluation strategies, which will be tailored to each pilot delivery area and respective delivery partners.

The evaluation would capture how many people are granted the right to work and how many people are able to take up employment, and to what extent the pilot delivers its intended outcomes, including having a positive impact on people seeking

asylum, their families, and the communities they live in. The data requirements, evaluation questions, and the scale of the evaluation would need to be further explored once the details of the pilot are agreed. However, a pre/post mixed methods design could involve some or all of the following elements:

Pre-implementation

- Agreeing outcomes to monitor and measure success through a theory of change;
- Baseline survey with people seeking asylum and employers before the pilot is launched to establish current experiences in relation to the pilot's objectives and outcomes.

Post-implementation (post-twelve months)

- Follow-up survey with people seeking asylum and employers to compare any changes to experiences and outcomes;
- Interviews or focus groups with employers to discuss implementation of the pilot, identify any key issues, and explore delivered benefits;
- Interviews or focus groups with people seeking asylum, to explore their experiences of the pilot and its potential impact in-depth;
- A consultation-based survey with professional stakeholders and interested organisations;
- Analysis of secondary data sources, including to explore the pilot's objective regarding reducing cost and demand for UK/Scottish public services.

Due to the inclusive approach to eligibility, it is anticipated that the evaluation will be representative of the broader asylum-seeking population in Scotland, to ensure the evaluation is able to explore the impact and needs of different groups. To establish a counterfactual, we may consider including a comparable sample of people seeking asylum who are not participating in the pilot. Depending on the roll-out and scale of the pilot, this could either be people seeking asylum that are not participating in the scheme, or we could consider people seeking asylum residing in the north of England as a comparator. However, including a counterfactual sample of people seeking asylum may not be feasible due to a number of practical and ethical issues which would need to be carefully considered.

As set out above, we would also seek to involve employers in the evaluation, and, depending on what wrap-around support is offered as part of the pilot, local authorities and other organisations involved in support delivery could be invited to participate in the evaluation.

The outputs of the evaluation would provide a robust evidence base, and lessons learned could support decision-making around whether and how the right to work could be rolled out more broadly following the pilot.

5. Conclusion

The design of this pilot proposal has been shaped by stakeholders' and Scottish Ministers' desire to see a humane, principled approach to asylum right to work in the UK. We have worked closely with a range of partners including local authorities, employers and the third sector to develop a model which is aimed at supporting individuals and facilitating improved opportunities for integration.

The pilot proposal seeks to trial a range of changes to the current system; this includes allowing pilot participants awaiting a decision on their asylum claim to work from six months rather than twelve, to no longer be restricted to roles on the Immigration Salary List, and to be supported by a flexible, wrap-around provision of support such as employability and language learning.

Delivering this package of support will be crucial, as we know that employment pathways for those seeking asylum – in addition to their individual support needs – are complex. However, through this bespoke and wrap-around provision it is intended that the proposed pilot will achieve a range of positive outcomes and ensure that pilot participants have the best possible chance to find, and stay in, secure employment.

Based on the evidence we have considered, the Scottish Government firmly believes that giving people seeking asylum the right to work from an earlier point has the power to be transformative in terms of their integration and self-agency, and their ability to support themselves and their families; leading to longer-term benefits for our economy and reduced demand on our public services. We have been clear that we would carefully monitor and evaluate the delivery of this proposed pilot, to capture and share any lessons learned and to build the evidence base to inform broader future policy change.

This pilot proposal also identifies a range of areas in which the Scottish Government would look to engage and collaborate with the UK Government in order to agree specific parameters for delivering the prospective pilot, and to ensure it can feasibly be delivered within the current UK policy framework. We ask the UK Government to review this pilot proposal and to engage further with the Scottish Government and partners to develop and deliver this proposed pilot.

6. Reference List

All-Party Parliamentary Group on Migration and All-Party Parliamentary Group on Poverty (2024) [The Effects of UK Immigration, Asylum and Refugee Policy on Poverty](#)

European Union (2024) [Directive \(EU\) 2024/1346 of the European Parliament and of the Council of 14 May 2024](#)

Expert Advisory Group on Migration and Population (2023) [Asylum Seekers - extending the right to work: evaluation, analysis, and policy options](#)

Migration Advisory Committee (2021) [Annual Report](#)

National Institute for Economic and Social Research (2023) [The Economic and Social Impacts of Lifting Work Restrictions on People Seeking Asylum](#)

Scottish Government (2021) [A Scotland for the future: opportunities and challenges of Scotland's changing population](#)

UK Parliament (2024) [Written question UIN 10285](#)

UK Parliament (2022) [Asylum Seeker Employment and the Cost of Living - Hansard](#)

Watts, B, McMordie, L, Bramley, G, Sims, R, Young, G & Rayment, M 2024, [Destitution by Design: righting the wrongs of UK immigration policy in Scotland](#). Heriot-Watt University.



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