COSLA

Scottish Government
Riaghaltas na h-Alba

Ending Destitution Together

Phase Two Delivery Plan

Foreword

Destitution should be unthinkable in a modern Scotland. However, it remains a daily reality for many people who have moved here to work, study, join family, or seek sanctuary from violence and persecution. Nobody should be forced into destitution. People who are subject to the No Recourse to Public Funds (NRPF) condition are members of our communities and we should be able to support them at times of crisis.

The Ending Destitution Together (EDT) strategy, launched in March 2021, was designed to prevent and mitigate destitution, regardless of someone's immigration status. The first strategy of its kind in the UK, it sought to clearly set out the impact of the NRPF condition on people living in our communities and the risks that arise from NRPF which can force people into destitution. The strategy was informed by powerful testimony from people with lived experience; knowledge from third sector organisations providing frontline support; and the expertise of local authorities, legal practitioners and public services. The Scottish Government and the Convention of Scottish Local Authorities (COSLA) have worked tirelessly with partners across the sector to continue to deliver the vision and principles of the strategy and provide vital support to destitute households in Scotland. Since 2021, the Scottish Government has invested at least £500,000 each year to support the most destitute in Scotland.

The NRPF condition continues to force people into destitution when they are at their most vulnerable. It exacerbates existing inequalities by excluding some of our most vulnerable households from accessing essential support when they have nowhere else to turn. When people are excluded from mainstream welfare services, the responsibility for supporting them is transferred onto local authorities, other public services, and the third sector.

Data gathered from local authorities in Scotland by COSLA has shown year on year increases in the number of NRPF households approaching councils for support. Ongoing work funded by the Scottish Government to provide training and guidance to frontline services includes COSLA's Migrants' Rights and Entitlements Guidance, and immigration support provided by the International Organization for Migration (IOM). Both have contributed to increased awareness and understanding of the rights of people with NRPF and strengthened pathways out of destitution and into mainstream services.

Evidence from the COSLA local authority NRPF survey has also informed development of a range of policy recommendations, highlighting clear links between NRPF destitution, homelessness and child poverty. COSLA's data shows the very real impacts of the NRPF condition on local services in Scotland, and it is particularly concerning as Local Government budgets come under increasing pressure. Scottish Government and COSLA remain committed to supporting the human rights of those fleeing violence and persecution, as illustrated by the continuing work to support New Scots and displaced people from Ukraine. This EDT Delivery Plan

clearly sets out our inclusive approach with a series of ambitious actions, designed to remove barriers, raise awareness, knowledge and increase support for those at risk of destitution.

During 2024/25, a review of the EDT strategy was undertaken in partnership with stakeholders, third sector organisations, people with lived experience and local authorities. The review concluded that the vision and principles of the EDT strategy are as relevant today as the day they were published and remain the focus of our approach. Many of the action areas also remain relevant but there is a need to consider the changed landscape in which the strategy operates.

To that end, we are pleased to present this plan outlining the direction of delivery during this second phase of the EDT strategy.

This EDT Delivery Plan focuses on thirteen cross-cutting action areas to improve outcomes for those with insecure immigration status. These include actions to tackle child poverty, improve financial inclusion, challenge violence against women and girls, ameliorate access to health services and mental health services, as well as continuing to engage with the UK Government to address barriers faced by people with the NRPF condition.

It is recognised that there are limits on action that can be taken because immigration and nationality, including NRPF policy, are reserved to the UK Parliament. We resolve to do as much as possible, within devolved competence, to address destitution. The Scottish Government and COSLA will continue to raise issues impacting people living in Scotland with UK Government in order that policy and legislation prevent, rather than create, destitution. We believe it is morally right that everyone in our communities has their human rights respected and can access support in times of need. We remain bold in our actions and ambitions as we strive to create a fairer Scotland for everyone.

As we move to deliver this plan, it remains important to work together to ensure Scotland is a warm and welcoming country and to deliver change for people who need our support. We must be courageous in utilising the powers that are devolved to us to ensure that people living in Scotland are able to seek support when they need it without fear, and regardless of their immigration status.

Simita Kumar

Minister for Equalities and International Development

Councillor Maureen Chalmers

COSLA Community Wellbeing Spokesperson

The strategy

The Ending Destitution Together (EDT) Strategy aims to improve outcomes and support options for people with No Recourse to Public Funds (NRPF) living in Scotland. The strategy was developed jointly by Scottish Government and COSLA and published on 24 March 2021. Engagement to inform the development of the strategy included input from frontline staff in third sector support organisations, local authorities, public services, legal practitioners and people with lived experience of NRPF and destitution. The strategy is being delivered in partnership between the Scottish Government and COSLA.

The strategy builds on an inquiry and the Hidden Lives - New Beginnings report by the Scottish Parliament's Equalities and Human Rights Committee into destitution and insecure asylum status in Scotland. EDT takes a preventative approach that aims to support people to resolve the issues they face before they reach a point of crisis. For people who experience destitution, it aims to improve the safety nets that are available in Scotland.

What is destitution?

A person is destitute if they do not have adequate accommodation, or means of obtaining it, whether or not their essential living needs are met. Or, where they have adequate accommodation, or means of obtaining it, but can't meet other essential living needs. Destitution is absolute poverty, where people cannot afford essentials they need to be safe, warm and fed. It has a severe impact on health and wellbeing.

The EDT vision is that:

"No one in Scotland is forced into destitution and everyone has their human rights protected, regardless of their immigration status."

There are three principles to frame the strategy approach:

- Prevention – to support people before crisis, enabling people to make more informed decisions and access assistance prior to suffering the impact of destitution.
- Partnership – to take a coordinated, collaborative approach across the public and third sectors.
- Personalisation – the complexity of NRPF requires responses and prevention to be flexible enough to recognise individual needs and circumstances. A 'one size fits all' approach will not be effective.

EDT is a cross-cutting strategy and the first of its kind in the UK. Implementation of this new delivery plan will continue to take a person-centred, trauma-informed and accessible approach.

Continued commitment

As in previous years of delivery, partners will continue to make a significant contribution to the implementation of the actions set out in the strategy. There is a recognition that despite continued and emerging challenges relating to the rights and entitlements of those at risk of destitution, through the ongoing commitment of partners and stakeholders, we will continue working towards a Scotland where no one is forced into destitution, and everyone has their human rights protected, regardless of their immigration status.

The Scottish Government and COSLA will continue to champion a collective approach to improving outcomes and support options for people with NRPF living in Scotland. This includes through ongoing engagement with other relevant national strategies and action plans, such as Ending Homelessness Together, the New Scots Refugee Integration Strategy, the Tackling Child Poverty Delivery Plan, the Equally Safe Strategy, No One Left Behind, Scotland's Trafficking and Exploitation Strategy, the Mental Health and Wellbeing Strategy, the Self Harm Strategy, the Suicide Prevention Strategy, the Population Health Framework and the Anti Racism Delivery Plan, to name but a few.

The Scottish Government and COSLA will also continue to raise issues impacting the rights and entitlements of people living in Scotland and urge the UK Government to prevent, not create, destitution. Through this next phase of delivery, we will respond to legislative and immigration policy changes at a UK level ensuring the impacts for those with NRPF are understood and considered when progressing the actions in this delivery plan. We will ensure services remain informed of, and responsive to, new duties in this area.

Data

In 2022, the COSLA Community Wellbeing Board agreed to the introduction of an annual local authority survey to build an evidence base of current NRPF support and associated costs to local authorities.

The survey was co-designed by COSLA and the Centre on Migration, Policy and Society (COMPAS), Oxford University, as part of the Understanding Migrant Destitution in the UK research. This research, published by COMPAS in January 2024, provided the first comprehensive overview of NRPF activity across the four nations of the UK and sought to establish an authoritative evidence base of local authority provision for those with NRPF at risk of destitution.

The COSLA local authority survey data has continued to inform policy and practice, and provides crucial evidence on the costs of local authority support and the changing patterns of NRPF destitution in Scotland. The Scottish Government and COSLA remain committed to improving the NRPF data, research and evidence in Scotland to identify gaps and areas for future development.

Consultation and methodology

During 2024/25, the Scottish Government and COSLA facilitated a number of consultation sessions to inform the review of the delivery of the strategy, with engagement from delivery partners, key stakeholders, lived experience and local authorities. The sessions were structured around key themes including housing; homelessness; social security; health; support services; employability; lived experience; and advice and guidance. The focus of the sessions was a review of the strategy aimed at better understanding the challenges faced by people with NRPF and the frontline services supporting them. Feedback and discussion from the sessions has informed the development of this delivery plan.

Research and evaluation

There has also been extensive research and evaluation conducted on destitution in Scotland. The Institute for Social Policy, Housing, Equalities Research (I-SPHERE) at Heriot Watt have produced a detailed evaluation called 'A Fair Way Forward' of the work delivered by Fair Way Scotland with key recommendations for UK Government, Scottish Government and Local Government. These recommendations, along with those set out in the 2025 Lawmanity report 'Ending Destitution in Scotland – A Road Map for Policymakers' have played an important role in informing the development of actions in this delivery plan.

The evidence shows that migrant destitution in Scotland is both widespread and intricately linked to UK immigration policy, particularly the No Recourse to Public Funds (NRPF) condition. COMPAS research highlights rising numbers of people approaching local authorities for support, alongside significant under-reporting, and data gaps, with national estimates suggesting the scale may be substantially higher than recorded. Migrants with NRPF are often excluded from mainstream welfare even in extreme hardship, with post-Brexit changes increasing the number of EEA nationals affected. In response, COMPAS called for improved data collection, clearer national coordination, and minimum standards of support. The 2025 Lawmanity analysis argued that Scottish and local government already have scope within devolved powers to act more decisively, with some suggestions for further consideration including: redesigning policies to widen access, exploring financial support options, and shifting frontline practice towards more proactive, rights-based support, while also seeking greater clarity from the UK Government on the definition of 'public funds'.

Evidence from practice, particularly the Fair Way Scotland model, demonstrates what effective intervention looks like. Evaluations show that its integrated approach - combining accommodation, legal advice, cash support and casework - reduces destitution and homelessness, improves wellbeing, and delivers strong value for money, though current provision meets only around a quarter of estimated need. Cash-first and flexible, person-centred support are especially impactful, but demand continues to outstrip capacity. COSLA survey data reinforces the scale of the issue, with supported cases rising significantly in recent years and most assistance delivered under children's legislation. Taken together, the evidence points to the need for expanded provision, more consistent local authority responses, and a

strengthened, system-wide approach to ending migrant destitution in Scotland. Nobody should be forced into destitution. People who are subject to NRPF are members of our communities and we should be able to support them at times of crisis.

Turning evidence into action

In response to this growing demand, and the strengthening evidence-base on NRPF, this delivery plan combines practical action, such as improving access to financial support, housing and advice, with continued engagement with the UK Government to address systemic barriers and reduce the risk of destitution.

As well as continuing to learn from and build upon the Fair Way Scotland Emergency Cash Support and Casework project which is delivering successful outcomes in lifting people out of destitution, Scottish Government and COSLA will establish a short life working group to explore financial support options for people with NRPF in Scotland. This work will help identify if there are options for Scottish Government, local government or other partners to go further in the provision of financial support while remaining within the confines of devolved powers.

We know that people subject to the NRPF condition experience disproportionate barriers across a range of public and support services, including housing, healthcare, social security and support for women and girls who have been affected by violence. This also has a particularly acute impact on children and families.

This delivery plan takes a cross-cutting approach and aligns with key national strategies such as Equally Safe, Ending Homelessness Together and the Child Poverty strategy to ensure that the needs of people with NRPF are considered in areas such as child poverty, homelessness and health, and that services are better equipped to respond to these inequalities.

Local authorities play a vital role in supporting people who face destitution in their communities and this plan includes an action for Fair Way Scotland to work intensively with a local authority to test approaches that maximise support for households with NRPF. It is hoped that this pilot will generate learning that is relevant for all local authorities.

Changes to the asylum and immigration systems at UK level are expected to increase destitution. For this delivery plan to remain relevant, it needs to be informed by those who have lived experience of destitution and underpinned by robust data. This delivery plan includes actions to strengthen the evidence base through continued data collection, improved national coordination, and the identification of gaps in current knowledge, as well as ensuring that those with lived experience have opportunities to feed in to policy development.

This delivery plan and the funding that underpins it, represents a significant continued commitment to tackling destitution within Scotland. The wide range of actions identified have been informed by the evidence base but will continue to

evolve as we learn more about what works in preventing and mitigating the harmful impacts of destitution.

Ending Destitution Together Phase Two – Delivery Plan for 2026-2029

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Financial Inclusion	We piloted a Hardship Fund to support people with NRPF across Scotland who are facing crisis situations (delivered between 2021 and 2024).	Maximise access to financial support for people with NRPF, where possible, within devolved competencies.	Scottish Government COSLA Fair Way Scotland	Continue to provide funding to support a casework and emergency cash project to support >1000 people until March 2027. Scottish Government and COSLA will establish a short life working group to explore financial support options for people with NRPF in Scotland.	Assess potential for sustainable funding of casework and emergency cash model. Continue to review devolved benefits and engage with the UK Government on public funds eligibility. Continue work with local authority and third sector welfare advice services to improve awareness and understanding of NRPF rights and entitlements.

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Housing and Homelessness	We will contribute to the ambition of ending homelessness and specifically support actions relating to people with NRPF and destitute asylum seekers, as set out in the Ending Homelessness Together action plan.	Work with specialist organisations, Registered Social Landlords (RSLs) and local authorities to improve access to housing for people subject to NRPF.	Scottish Government COSLA Fair Way Scotland	Support local approaches to winter and severe weather accommodation provision, ensuring inclusion and consideration of people with NRPF.	Continue to support the third sector to develop and deliver accommodation models for households ineligible for local authority accommodation. Explore opportunities to improve collection of NRPF data through national homelessness reporting. Ensure appropriate reference to NRPF specific issues is included when the Code of Guidance on Homelessness is updated.

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Child Poverty	N/A	Ensure that the needs of children and families with NRPF are actively considered and reflected in the delivery and implementation of actions to tackle child poverty in Scotland.	Scottish Government COSLA	Work with partners to raise awareness and improve access to Free School Meals for children in households with NRPF. Work with partners to raise awareness and improve access to School Clothing Grants for children in households with NRPF. Work with partners to improve access to funded early learning and childcare for children in NRPF households in line with actions in the Tackling Child Poverty Delivery Plan.	Continue to connect the Ending Destitution Together Strategy with the Tackling Child Poverty Strategy and Delivery Plan. Contribute to the reduction of child poverty by ensuring the needs of children and families with NRPF are identified, understood and addressed.

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Lived Experience	We will work with people with lived experience of destitution and NRPF to continue to inform and shape the strategy during implementation. This will include supporting opportunities for people to participate meaningfully in policy development and service design at a national and local level.	Delivery and implementation of the strategy and plan is informed and shaped by lived experience.	Govan Community Project Scottish Government COSLA	Expand lived experience representation through Govan Community Project's Experts by Experience, ensuring broader geographical reach and representation of wider groups of people with NRPF.	Continue and deepen dialogue with lived experience groups to inform strategy, development and implementation. Review lived experience approaches and establish a sustainable funding approach to ensure that lived experience continues to inform delivery of the strategy.

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Local Authority Immigration Advice	We will increase access to specialist immigration advice to support local authorities assisting people with NRPF. This will help support especially vulnerable groups and complex cases, as well as building local capacity and strengthening local service design. It will also collect data to strengthen the national evidence base on immigration advice needs.	Provide immigration advice to local authorities and third sector partners to support the progression of immigration claims, mitigating the destitution risk for people with insecure immigration status.	COSLA International Organization for Migration (IOM)	Continue funding IOM to provide specialist immigration advice until March 2027.	Seek to establish a sustainable funding model for the provision of this specialist immigration advice. Continue to review the changing immigration landscape to inform future advice needs.

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Diagnostic Legal Advice	We will invest in the provision of diagnostic legal advice delivered in partnership with advocacy support for people subject to NRPF, including expanding the geographical reach outside Glasgow.	Continue to provide diagnostic legal advice and advocacy support through the Refugee Support Service (RSS).	Scottish Refugee Council Refugee Support Service	Continue to fund the RSS service until March 2028.	Seek to establish a sustainable funding model for the provision of this advice.

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Local Authority Guidance and Training	We will update guidance and training to support local authority provision of services to people with NRPF. We will deliver further training to officers working in local authorities and launch a new online learning module. We will also provide training to third sector organisations to support understanding of local authority duties and responsibilities and encourage partnership working.	Local authority staff and other frontline workers have access to guidance and training that reflects current UK immigration rules and rights and entitlements in Scotland.	COSLA	Continue to review, update and publish refreshed non statutory Migrants Rights and Entitlements Guidance by March 2027.	Continue to review and refresh guidance, training content and legacy resources to ensure they remain up to date for local authority staff. Deliver a range of national training and learning opportunities to support local authority provision of services to people with NRPF.

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
NRPF Data, Research and Evidence	N/A	We will continue to take an evidence-based approach to NRPF in Scotland and identify opportunities to improve data gathering and evidence.	COSLA Scottish Government Fair Way Scotland	COSLA to continue collecting annual local authority data on NRPF presentations and support. Fair Way Scotland to continue research and evaluation of NRPF policy in Scotland. Fair Way Scotland funded to work with a local authority and test approaches that maximise support for households with NRPF.	Review NRPF data, research and evidence in Scotland to identify gaps and future areas of work. Review and share learning from the Fair Way local authority demonstration project at a national level.

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Violence Against Women and Girls (VAWG)	N/A	Ensure women with NRPF experiencing VAWG have access to relevant information, advice and support.	Scottish Government COSLA	Work with specialist organisations and VAWG Strategic Partnerships to increase awareness amongst frontline workers of the immigration options for people experiencing domestic violence, including through development of an NRPF VAWG factsheet and delivery of information sessions and training.	Continue strategic engagement with the Equally Safe Strategy, including the Addressing Violence Against Minority Ethnic Women and Girls Network, to ensure women with insecure immigration status experiencing VAWG are supported in line with the recommendations of the Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO / the Istanbul Convention).

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Violence Against Women and Girls (VAWG)	N/A	Ensure women with NRPF experiencing VAWG have access to relevant information, advice and support.	Scottish Government COSLA	Scottish Government has increased their investment in the Fund to Leave from £1.5m in 2025-26 to £2m in 2026-27 and is committed to making this fund permanent. This increased investment will allow the national Fund to Leave to reach even more women and children, helping them take the first steps towards a stable, secure and independent future, free from abuse. This includes women with NRPF.	

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Access to Health Services	We will improve access to primary health services, including by working with Public Health Scotland and other partners to address health inequalities experienced by people subject to NRPF, translating Health Access Cards and promoting to NHS staff the right to access healthcare for migrants and people seeking asylum.	Support improved health outcomes for people with NRPF through preventative approaches, better access to health services and increased staff knowledge and understanding of NRPF in healthcare settings.	Public Health Scotland (PHS) Scottish Government COSLA	PHS will continue to build knowledge and understanding of NRPF to frontline health workers across various services through awareness raising sessions, resources and signposting, in collaboration with key partners.	Develop and publicise resources to ensure people with NRPF, and those supporting them, understand their rights and entitlements in a healthcare setting. Connect the Ending Destitution Together Strategy with the Population Health Framework.

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Mental Health Support	We will improve access to mental health services for adults and children with NRPF by working to better understand the barriers and to collectively agree the practical actions that can be taken by local authorities, the Scottish Government and the NHS. We will also work to inform forthcoming work on mental health service renewal.	Improve access to mental health support services for those who have NRPF and are at risk of destitution.	Public Health Scotland (PHS) Scottish Government COSLA	Ensure that the needs of people with NRPF are reflected in the ongoing delivery and implementation of the Mental Health and Wellbeing, Self Harm and Suicide Prevention strategies.	Continue to connect the Ending Destitution Together Strategy to the Mental Health and Wellbeing, Self Harm, Suicide Prevention and the New Scots Strategies.

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Employability	We will ensure that employability support is accessible for people subject to NRPF who have permission to work. We will improve understanding of the employability support needs of people with NRPF to strengthen the pathways and approach of No One Left Behind.	Improve awareness and access to employability support for people with NRPF including pathways out of destitution through employment.	Scottish Government COSLA	Ensure the needs of people with NRPF are reflected in the ongoing delivery and implementation of the No One Left Behind and New Scots strategies.	Continue to raise awareness amongst services of the employment risks faced by people with NRPF.

Action Areas	Initial EDT Strategy Action	Objective	Delivery Partners	Delivery Period 2026-2027	Delivery Period 2027-2029
Reserved Matters	N/A	Engage with the UK Government to address barriers faced by people with NRPF condition.	Scottish Government COSLA	Continue to engage with UK Government NRPF officials and policy experts to understand the impact of UK Government reforms to the asylum and immigration system on destitution.	Take an evidence based approach to considering possible mitigations to reduce the impact of harmful UK Government policies on people under NRPF conditions. Seek to agree a memorandum of understanding with the Home Office on public funds guidance powers, specifically with respect to the exercise of Scottish devolved powers.

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