

# EU Settlement Scheme (EUSS): monitoring report

Equality and Social Justice Committee | 19 May 2025

Following Brexit, EU citizens<sup>1</sup> who were living in Wales before 31 December 2020 must have applied to stay by 30 June 2021. Applications must be made to the UK Government's [EU Settlement Scheme](#) (EUSS). This applies to citizens from EU Member States, Norway, Iceland, Liechtenstein and Switzerland. Irish citizens are exempt [under separate arrangements](#).

[Citizens' rights](#) form key parts of separation agreements reached between the UK, the EU and [other European countries](#) as part of Brexit. The agreements, which include the UK-EU Withdrawal Agreement, guarantee the rights of citizens from the EU, Norway, Iceland, Liechtenstein and Switzerland in the UK, and vice versa.

The Welsh Government and Senedd must comply with these agreements. The Welsh Government's [Cabinet Secretary for Social Justice, Trefnydd and Chief Whip, Jane Hutt MS](#) ("the Cabinet Secretary"), is responsible for EUSS-related activities in Wales.

The UK's independent watchdog, the [Independent Monitoring Authority \(IMA\)](#), was established to protect the rights of EU citizens in the UK. This is required by [Article 159 of the UK-EU Withdrawal Agreement](#) and [Article 64 of UK-EEA EFTA Separation Agreement](#). Swiss citizens are not covered by the IMA.

The [number of eligible EU citizens](#) in Wales and the UK is unknown so nobody knows how many applications there should be. Since its launch, [8.4 million](#)

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<sup>1</sup> EU, EEA-EFTA and Swiss nationals and their family members are eligible for the EU Settlement Scheme. Irish nationals are exempt. For ease, this report uses the term "EU citizens" to describe this group.

**applications** have been made to **the EUSS** UK-wide relating to 6.3 million people (some will have multiple applications). Initial estimates showed there could be 95,000 eligible citizens in Wales but the latest statistics show that there have been 111,274 successful applications to date.

**EUSS statistics** are recorded by the UK Government. High level statistics are published monthly and detailed statistics, including Wales-level data, are published quarterly. **Between its launch in 2019 and 13 June 2024**, EUSS statistics were presented as standalone statistics. Since then, they have been integrated into **Immigration system statistics**.

Quarterly reports are provided to the Committee to inform its EUSS monitoring. This report presents Wales-level statistics up to **31 December 2024**.

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## 1. Senedd debate

In November 2024, this Committee held a [Plenary debate](#) of the whole Senedd on the EUSS as part of its commitment to raise awareness of the EUSS in Wales.

Committee Chair, Jenny Rathbone MS, said:

we called this debate for one main reason, and that's to ask all Members and the Senedd collectively to do more to highlight the issue in our communities

She pointed to warnings, that the EUSS has led to warnings of “a second Windrush”, as a particular concern. More information on this aspect of the EUSS is available in the Senedd Research article, [Are EU citizens in Wales at risk of a “second Windrush”?](#)

The debate provided an opportunity for all Members to discuss the EUSS and for the Cabinet Secretary for Social Justice, Jane Hutt MS, to respond to the points raised. Members from all political parties contributed to the debate, including the Chairs of the Legislation, Justice and Constitution Committee and the Culture, Communications, Welsh Language, Sport and International Relations Committee.

The Cabinet Secretary thanked this Committee:

for not just these reports, but your continuing commitment and scrutiny—scrutiny, rightly so, of the Welsh Government.

On EU citizens in Wales, she said:

The Welsh Government very much values, as we've always said, the contributions that EU citizens make to our communities, culture and economy. We'll continue to ensure their needs are met in terms of support. [...]

Since 2019, the Welsh Government has been committed to ensuring EU citizens can continue to live and thrive in Wales. We've provided nearly £3 million of grant funding to support EU citizens in applying for the EU settlement scheme, and to remain here in Wales should they wish to do so. The funding has complemented the support provided by the UK Government

On working with the new UK Government, she explained that she and the First Minister had met with the UK Government's [Minister for Migration and Citizenship, Seema Malhotra MP](#), on migration issues and would report to the Minister following the debate on issues raised, including on "the importance of data sharing". She added:

I think there will be a breakthrough in terms of data sharing as a result of the new UK Government, and also the evidence that we are giving that this excludes people, this is unnecessary, and we need to disaggregate data on every level, and that's what we're seeking.

The Cabinet Secretary outlined other EUSS matters detailed in the remainder of this report and thanked Members for their contributions to the debate.

The debate followed this Committee's [evidence session in July 2024](#) with the 3million, Settled, the Migration Observatory and Fiona Costello of Cambridge University, and [in September 2024](#) with the IMA. Key themes raised in evidence included:

- Lack of awareness;
- Intergenerational impact;
- Data;
- Digital-only status;
- Late applications;
- Roma community;
- The role of the Independent Monitoring Authority;
- The future of the EUSS; and
- The future role of this Committee and the Senedd.

More detail on each can be found in our [previous monitoring report](#).

## 2. Latest quarterly statistics (up to 31 December 2024)

### Applications received

128,450 applications were received from Wales, including 22,411 applications for those aged under 18. 126,684 applications (98.6%) received a decision by the cut off for the statistical reporting and are referred to as 'concluded applications'.

### Successful outcomes

111,274 EU citizens who lived in Wales before Brexit can stay, either permanently or temporarily.

Successful applicants are granted a status of either 'settled' or 'pre-settled'. 70,788 (55.9%) applicants in Wales were granted settled status and 40,486 (32.0%) were granted pre-settled status.

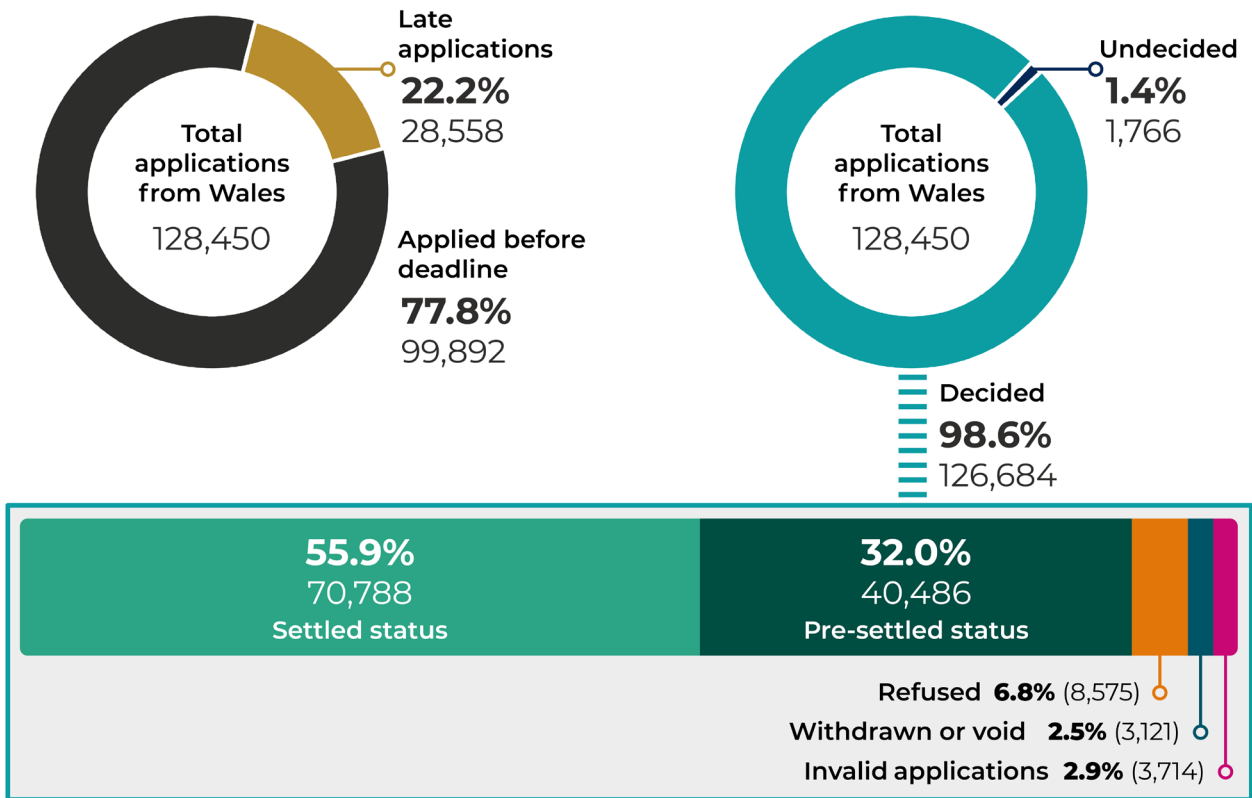
### Unsuccessful outcomes

Unsuccessful applications are categorised as refused, invalid, withdrawn or void. 6.8% were refused (8,575 applications), 2.5% were withdrawn or void (3,121 applications) and 2.9% were invalid (3,714 applications).

### Infographics

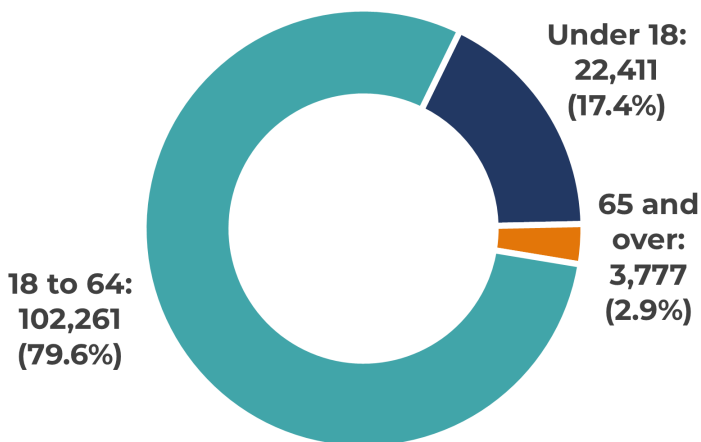
Figure 1 below shows the percentage and number of applications from Wales. It shows whether they were received before/after the deadline, whether they received a decision ("concluded") and the outcome.

**Figure 1: EUSS applications from Wales by date, concluded applications and outcomes by percentage and number:**



Source: UK Government [Immigration System Statistics: EU Settlement Scheme – Summary tables, December 2024](#). Numbers are rounded to the nearest 10 therefore breakdowns may not match overall totals.

**Figure 2: Total applications by age (128,450 total)**



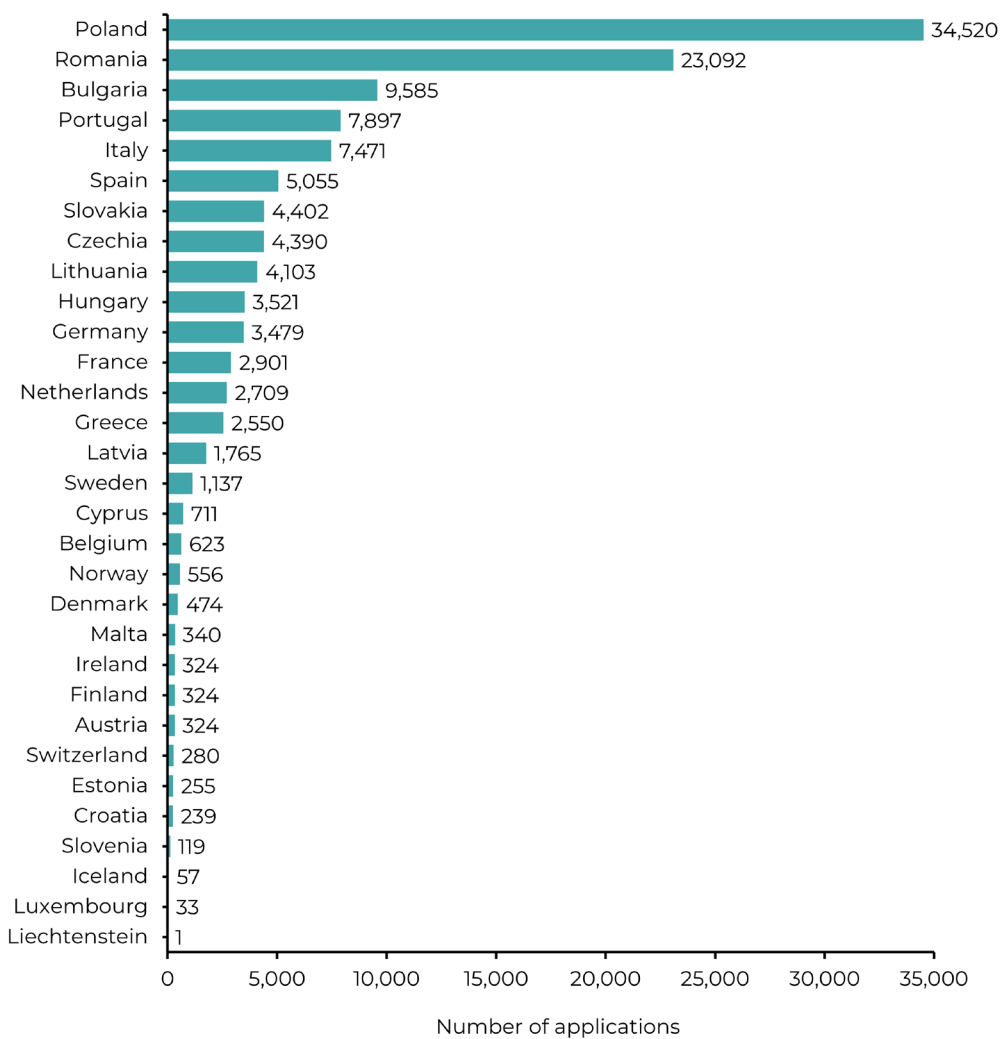
Source: UK Government [Immigration System Statistics: EU Settlement Scheme – Summary tables, December 2024](#)

Figure 2 above shows applications by age group. Of 128,450 applications from Wales:

- 102,261 (79.6%) were between 18-64 years of age;
- 22,411 (17.4%) were under 18; and
- 3,777 (2.9%) were 65+.

The Committee has previously received evidence from Cambridge University’s Fiona Costello that the group of applicants aged 65+ “is a real issue that maybe hasn’t been looked at as much as it should be”. She said this group is likely to have lived in the UK for “quite a long time” and to believe the EUSS doesn’t apply to them. They also could have missed out on support as services moved online during the pandemic, particularly those in care or with dementia.

**Figure 3: Total applications by European country (128,450 total)**



Source: UK Government [Immigration System Statistics: EU Settlement Scheme – Summary tables, December 2024](#).

Figure 3 above shows total applications by European country. Of 128,450 total applications, the greatest number of applicants are made by citizens from Poland (34,520) Romania (23,092), Bulgaria (9,585), Portugal (7,897) and Italy (7,471). The Migration Observatory's [Mihnea Cuibus explained](#) why this is significant:

we can see around half of all applications that were submitted in Wales came from these three nationalities [Poland, Romania and Bulgaria], which is important to keep in mind, because our research has shown that a lot of these eastern European nationals tend to be concentrated in lower-income work, and they're often more likely to be in situations that make them more vulnerable to missing out on the EUSS.

Fiona Costello added that it was a “missed opportunity” not to collect data on ethnicity and gender which would have given “a fuller picture”.

Members may wish to ask the Welsh Government for an update on:

- the latest steps taken to raise awareness of the need to apply to the EU Settlement Scheme; and
- whether it targets awareness raising campaigns at specific age/nationality groups, such as citizens aged 65+ and eastern European nationals, in light of specific evidence received by the Committee, that these groups may be harder to reach.
- financial and non-financial support it is currently providing to EU citizens to apply, including the amount and duration of current funding.
- working with the UK Government to support EU citizens, including coordination funding.

### 3. Pre-settled citizens

Originally, pre-settled status expired after five years and had to be converted to settled status via a second application. This means that the 40,486 citizens who have been granted pre-settled status and want to stay in Wales beyond its expiration would need to apply again. Failure to reapply would result in the automatic loss of the right to work, access housing, education and benefits, and could result in deportation.

On 21 December 2022, the [High Court ruled](#) that the automatic loss of rights for failing to make a second application was unlawful under the Brexit separation agreements. The former UK Government [did not appeal](#) the decision and initial changes to the EUSS scheme were [announced](#) on 17 July 2023. More changes were [announced in May 2024](#).

## Changes to pre-settled status

In summary, the [changes made to the EUSS](#) are that:

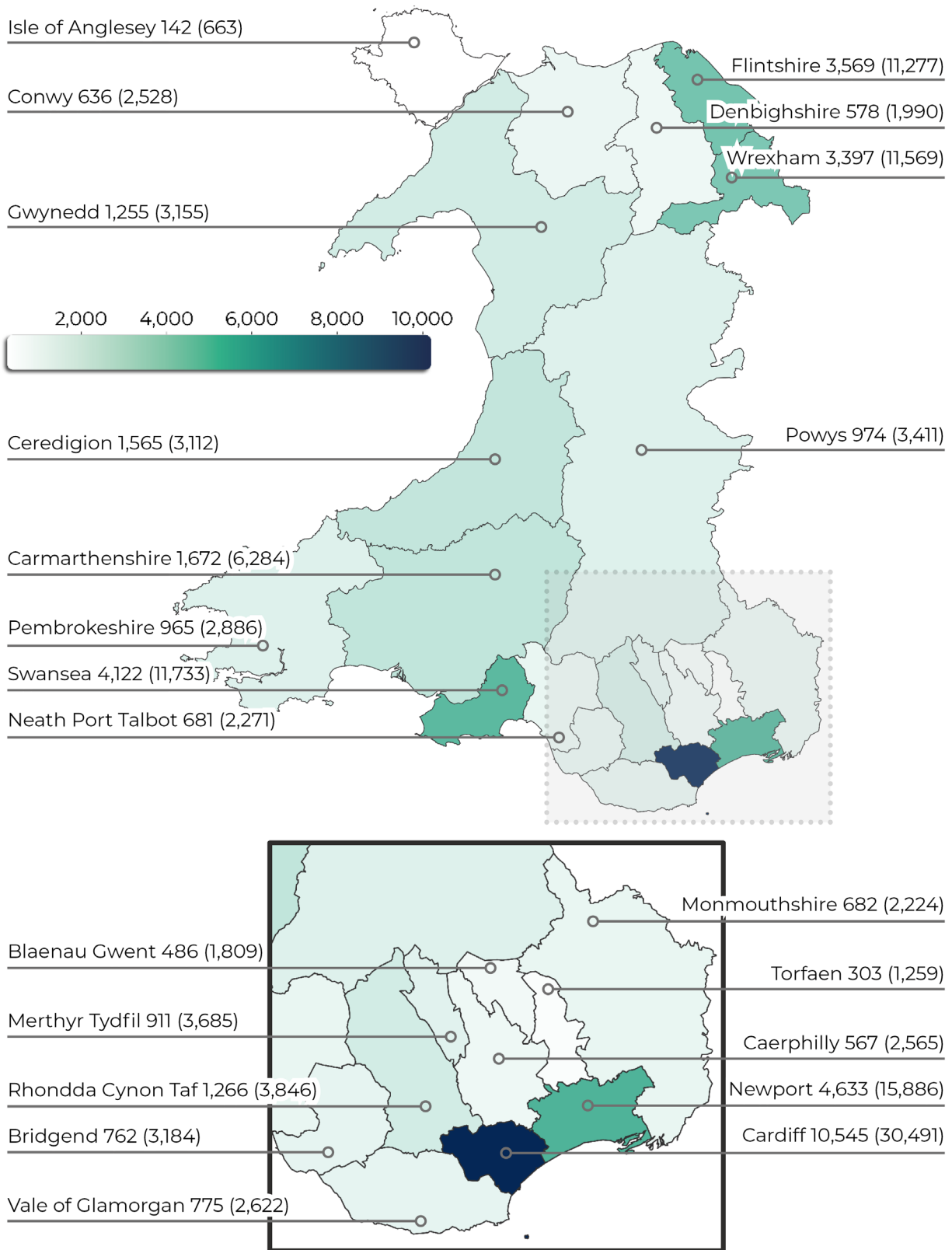
- Eligible pre-settled status holders will be automatically converted to settled status without needing to apply. Individuals eligible for automatic conversion will not need to submit a new application to upgrade their status. The Home Office will use existing data to verify eligibility for settled status. The Home Office will notify pre-settled status holders who are being considered for automatic conversion.
- Pre-settled status will be automatically extended by five years before its expiry date.
- The changes are being implemented in phases, with initial focus on individuals whose pre-settled status is expiring soon.
- pre-settled status expiry date will be removed from the digital profiles shown to third parties in the online checking services for Right to Work, Right to Rent and View and Prove.
- Employers, landlords and letting agents will not be required to conduct a further right to work or rent check where the individual remains in their employment or as part of that tenancy agreement.

More detail on the changes, including key questions raised in evidence to this Committee, can be found in the Committee's [September 2024 monitoring report](#).

## Pre-settled citizens in Wales

There are 40,486 pre-settled citizens in Wales, all of whom have individual status expiry dates. The map below shows the number of pre-settled citizens in each Welsh [local authority area](#). The total number of applications is shown in brackets.

**Figure 4: Map of Wales showing the number of pre-settled citizens in each Welsh local authority area, with the total number of applications shown in brackets**



Source: UK Government [Immigration System Statistics: EU Settlement Scheme – Summary tables, December 2024](#).

## Converting pre-settled status to settled

The number of those applying to convert their status from pre-settled to settled status are reported as a UK-wide statistic. 1,066,639 pre-settled citizens have upgraded to settled status via a second application. Automatic upgrades are not yet reported.

Information by UK nation is not provided. This means we do not know how many second applications have been received from pre-settled citizens in Wales trying to convert their status, nor how many have been automatically upgraded.

The Welsh Government's response to the Committee's second annual report in June 2024 states that it's made "numerous requests" to the UK Government to improve EUSS data collection and that:

It is pleasing a recent request for data on the number of EU citizens who have already been automatically upgraded to Settled Status, was met.

However:

We are unable to share this data as it has not been released into the public domain and the data will not be shared with Devolved Governments routinely.

It is not clear whether the former Cabinet Secretary for Culture and Social Justice, Lesley Griffiths MS, was referring to the new system of automatic upgrades, or upgrades via second applications.

Members may wish to ask the Welsh Government for an update on:

- changes made to the EU Settlement Scheme, including:
  - (i) Its role in implementation;
  - (ii) Wales-specific data on the number of pre-settled citizens who have been automatically upgraded to settled status and how many have applied to upgrade;
  - (iii) whether it is aware of any issues as a result of the changes; and
  - (iv) whether any issues or concerns around the changes remain unresolved.
- new or emerging issues relating to pre-settled status.

- its view on whether data sharing between the UK and Welsh governments has improved since the Committee’s debate in November 2024 when the Cabinet Secretary told Plenary she thought there would be a “breakthrough” in this area.
- on discussions with the UK Government on data sharing, including whether it has made further data requests to the UK Government since June 2024, and whether the information has been provided.
- on discussions on improvements to EUSS data, including the lack of Wales-specific data.

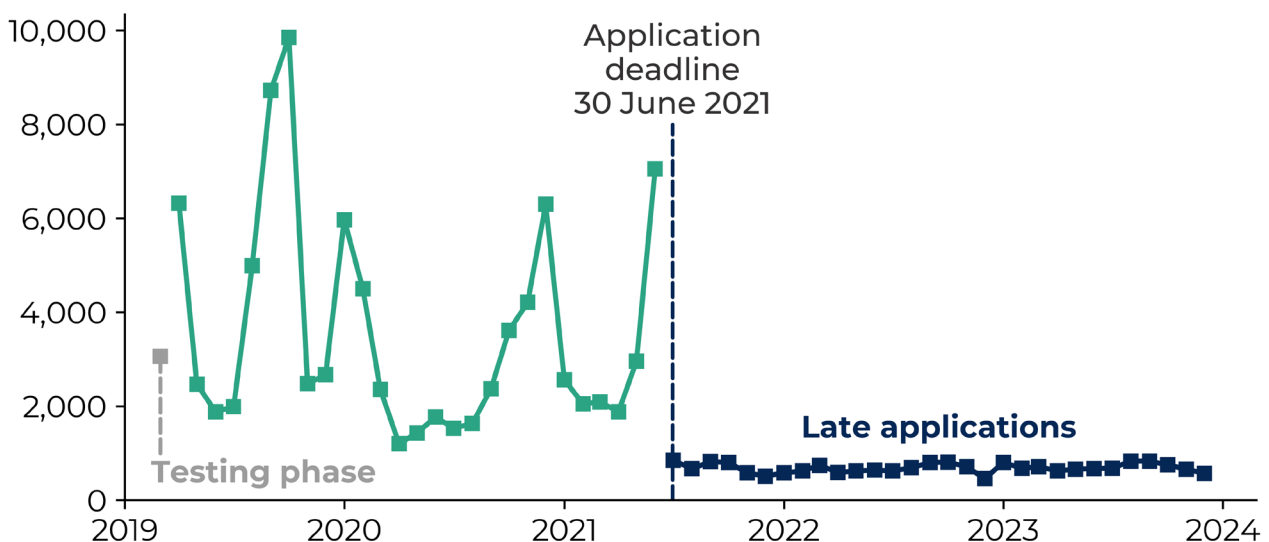
## 4. Late applications

The EUSS remains open to receive late applications, which are allowed if a person has reasonable grounds for missing the deadline. Examples include where a parent has failed to apply on behalf of a child or where a person has a serious medical condition.

### Late applications from Wales

The number of late applications from Wales reached 28,483 up to the end of December 2024. Statistics show that there were 539-812 late applications each month in 2024, as shown on the graph below.

**Figure 5: Monthly applications received from Wales**



Source: UK Government Immigration System Statistics: EU Settlement Scheme – Summary tables, June 2024

Migration Observatory explained to the Committee in July 2024 that UK-wide trends show the majority of applications after the deadline are second applications to convert from pre-settled to settled. A smaller share of applications, around 25%, are from 'late' applicants seeking a status for the first time. If the ratios at a UK-level are applied to Wales, of 500-800 monthly applications received after the deadline:

- 125-200 would be first-time 'late' applications; and
- 375-600 would be applications to convert from pre-settled to settled status.

### Narrowed eligibility criteria

In addition to the changes to pre-settled status described above, changes were also made to the reasonable grounds guidance to narrow the eligibility criteria. Fiona Costello explained:

What used to happen was that people would submit another application, previously, once they were rejected, when it was, in a sense, easier to do so. But now that's not the case, and people find that they can't submit another application as easily, they can't receive their certificate of application [proof they've applied to the EUSS] and then the domino effect on the rest of their lives happens when they can't work and they can't rent, et cetera.

### Refusal rate increase following narrowed criteria

The Migration Observatory notes that, UK-wide, "the refusal rate for applications has increased sharply over time, from below 3% of all decisions in early 2021 to 37% by June 2023". Fiona Costello noted in evidence to the Committee that, in Q1 2024, Wales saw a 10% increase in late applications, and also an increase in rejected and invalid applications. She concluded:

now that it's become more difficult to make a valid late application, we're seeing these rejections happen in larger numbers, as well.

## 5. No application

If a person has not applied to the EUSS and they come into contact with UK authorities, they will be issued with a 28 day notice to apply. The UK Government says that people who have not applied after the 28 day notice period will not be eligible for work, benefits or services and will not pass tenancy checks. They may be liable for enforcement action, although the UK Government emphasises that deportation will not be automatic.

## Two EUSS routes closed to new applications

The UK Government closed two EUSS routes to new applications from 8 August 2023:

1. EUSS Family Permit: applicable to family members of a qualifying British citizen (known as 'Surinder Singh' cases); and
2. Zambrano 'right to reside': applicable to primary carers of a British citizen (more information can be found in an article by [Turpin Miller](#)).

Members may wish to ask the Welsh Government:

- For an update on issues relating to late applications or no applications, including working with the Home Office to monitor and respond to issues.
- Its view on how issues relating to late applications or no applications will develop in future.
- Future plans to provide support to EU citizens in Wales.

## 6. Ukraine

The latest [statistics show](#) that 18,064 Ukrainians had applied to the EUSS up to 31 December, with 17,152 receiving a decision. The latest statistics provide the outcome of concluded applications, as follows: 6,579 (38.4%) were granted settled status and 8,938 (52.1%) were granted pre-settled status. The remaining applications were refused (527 – 3.1%), withdrawn or void (689 – 4.0%) or invalid (419 – 2.4%).

The number of applications by UK nation is provided for the second time, as follows:

- England: 17,302
- Scotland: 341
- Northern Ireland: 152
- Wales: 116

No further information is provided. 'Other and unknown' is listed as an additional category with 153 applications.

## 7. Welsh Government

This section provides an update on the latest developments from the Welsh Government.

### EU Citizens' Rights Forum

In its second annual report, the Committee welcomed the evolution of the Welsh Government's former EUSS Coordination Group into a reconstituted EU Citizens' Rights Forum. It added:

Given that the process of securing rights after Brexit is yet to conclude, we hope that the Forum will guarantee continued engagement with these issues in future. [Conclusion 11]

Conclusion 12 also said that:

The Welsh Government's commitment to continue sharing meeting minutes of the new EU Citizens' Rights Forum with the Committee complies with our previous recommendation. We warmly welcome this commitment to transparency.

The commitment has been codified in the Forum's Terms of Reference, which were shared with the Committee in January 2024. The latest meeting minutes received by the Committee, dated 27 March 2025 outlines the following developments:

- **Welsh Government 2025-26 budget:** The budget allocation for EU advice services was awaiting Ministerial sign off, including a proposed allocation of £50,000 for the Forum to undertake "research or activities to help EU citizens access their rights";
- **Home Office update:** An official provided an update, including that the first phase of automatic upgrades will use tax and benefits data to ascertain eligibility, while the second phase, due later this year, will use travel data and introduce a 'manual case working function'. The Home Office also plans to review settled citizens who may no longer meet the requirements of settled status and 'decide on appropriate action'. £500,000 has been

made available until March 2026 to support vulnerable individuals who need complex immigration advice;

- **Independent Monitoring Authority:** The IMA has four broad work areas of focus: future generations, travel, access and support, and securing status. It outlined several issues related to digital status/systems, including a reluctance to travel amongst citizens with pending status outcomes, entanglement of statuses and system downtime. The IMA has written to the Home Office to request more information and is “exploring the efficacy of the digital system”; and
- **Roma community:** Common EUSS issues amongst the Roma community were outlined, including issues with the digital-only status, the need to apply / upgrade pre-settled status and issues relating to children.

Two documents were shared with the Committee alongside the meeting minutes:

1. Presentation slides on ‘Roma communities in UK (Sheffield, Rotherham, London surveys) 2024’ (University of Sheffield and Roma Support Group); and
2. ‘EU citizens in the UK’ information sheet (Delegation of the European Union in the United Kingdom).

Members may wish to ask the Welsh Government:

- For an update on the Home Office’s review of settled citizens who may no longer meet the requirements of settled status.
- What ‘appropriate action’, referred to in the Forum’s meeting minutes, means for settled citizens who no longer meet the requirements.
- For its view on whether the review complies with the UK-EU Withdrawal Agreement, in light of the Welsh Ministers’ obligation to implement and observe international obligations as required by the Government of Wales Act 2006.
- Whether it has any concerns relating to the review.