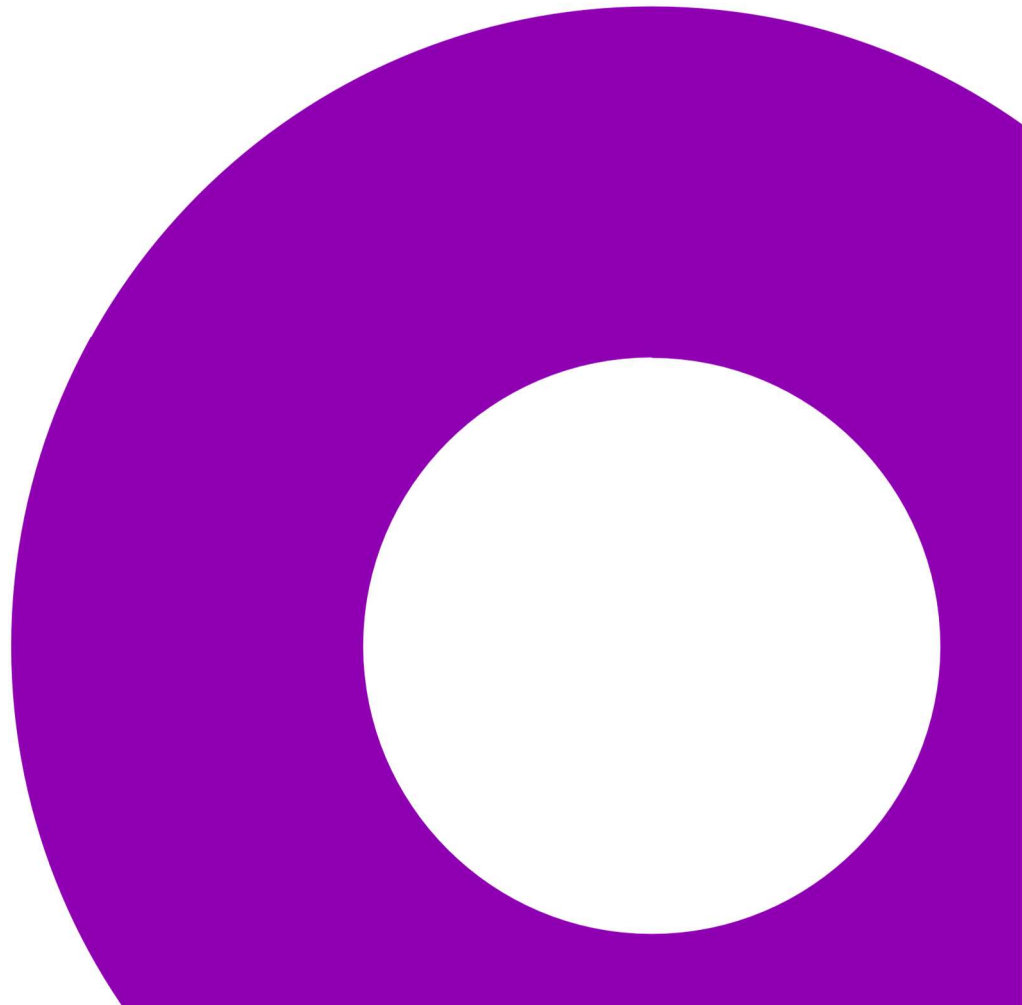


**Home Office
immigration
consultation:
A collective response
from the
London Volunteer
Centre Network**

Feb 2026



Home Office immigration consultation: Recommendations from the London Volunteer Centre Network

Introduction

The **London Volunteer Centre Network** has come together to respond to the [Home Office consultation](#) on proposed immigration reforms, which include volunteering as a potential contribution to 'earned settlement', giving migrants who volunteer faster access to settled status.

The network is strongly opposed to these changes, for the reasons outlined in this document. This is a collective response to what this network sees as the key volunteering elements in the consultation. It does not address other elements of the proposed reforms, to which there have been compelling responses from organisations working with migrants.

London Plus convenes the London Volunteer Centre Network and is willing to support continued dialogue around the proposals relating to volunteering as they would have wide-ranging implications for the volunteering sector and those who volunteer.

About the London Volunteer Centre Network

The [London Volunteer Centre Network](#) is made up of **27 local volunteering infrastructure organisations and services** that provide volunteering support and brokerage across London, **covering 28 of London's 32 boroughs**. Collectively, they place over **17,000 volunteers per year**, and provide volunteering brokerage and support to **almost 17,500 of London's volunteer-involving organisations**¹. Through their work with both volunteers and organisations they have an extensive reach into London's communities, including London's asylum seekers, refugees and migrant communities.

This is a network with significant expertise and a wealth of experience in volunteering. When it comes to volunteering, this group knows what works and what doesn't.

¹ [The Impact of London's Local Infrastructure 2022/23 - London Plus](#)

Key objections

Outlined below are the key objections to the volunteering proposals.

Volunteering should be voluntary!

Absolutely fundamental to volunteering is that it is voluntary! Volunteering should always be a choice and never coerced. Adding an element of compulsion or pressure to volunteer undermines what is really valuable about volunteering, and detracts from volunteers, who give their time freely for social action.

Increased demands on organisations and volunteering infrastructure

Volunteering is not a free resource; it requires significant work and investment to manage, to develop quality volunteering opportunities, to check & onboard volunteers, to support & supervise them, and to monitor & evaluate impact.

Compelling large numbers of asylum seekers to volunteer will place significant additional demands on the voluntary sector. As well as increased workload, we anticipate a significant increased reporting burden on organisations to provide the required evidence of a volunteer's contribution to 'earned settlement'.

The volunteering sector has real concerns about this additional workload and costs without additional resources for the organisations and infrastructure required to support volunteering. This is coming at a time when the sector is already struggling for capacity, and resources are scarce.

Some of our network member organisations already have projects working with asylum seekers & refugees, and/or supporting asylum seekers to volunteer, and it involves a significant amount of work:

- This group often requires financial and practical support to volunteer; they survive on very little money, they may not have mobile phones, or many clothes, relying on donations. Most will need expenses reimbursed in order to volunteer and will likely need this in advance. Some volunteer-involving organisations will struggle with this.
- This cohort is moved around a lot, often at very short notice. This would create a significant turnover of volunteers, which adds an additional workload to organisations placing, onboarding, training and managing them. This all comes at a cost, and it is unclear how these costs will be met. If, as we anticipate, there are large numbers of people volunteering for earned settlement, this will soon create unmanageable demands on organisations, and small organisations will be particularly impacted by this. According to the Charity Commission (2024), 80% of the 170,000 registered charities in England and Wales are small with an income of under £100k per annum.

Impracticalities

As mentioned above, migrants are often moved at short notice. This already causes issues with GPs and other health services. Unplanned relocations jeopardise

continuity of volunteering placements and, therefore, opportunities for early settlement.

Those without mobile phones would find it harder to find volunteering opportunities and maintain contact with the organisation they are placed with. This would impact both the volunteers and the organisations.

DBS-related barriers in identity verification processes significantly limit the number of organisations able to accept asylum seekers, resulting in far fewer opportunities than volunteers available. Asylum seekers largely cannot obtain a DBS check via usual channels and must instead provide additional proof of identity through a fingerprinting process undertaken at police stations. This process is not covered within standard DBS fees, increasing the cost for organisations wishing to onboard them as volunteers. Coupled with the fact that asylum seekers are often required to move at short notice, it becomes difficult to match them with suitable volunteering roles in the community. As most charities support vulnerable adults and children, DBS checks are an essential element of safeguarding, and only a very small number of roles will accept volunteers who cannot obtain a DBS through standard routes. As a result, most organisations we work with are unable or unwilling to onboard volunteers who cannot secure a DBS via the standard process. To address this, government support would be required to ensure that onboarding processes are accessible, affordable, and aligned with the wider proposal.

Discrimination

These proposals discriminate against those who are unable to volunteer, or to do so without additional support. They include people with caring responsibilities (predominantly women), those with language barriers, Disabled people, people with poor mental or physical health, neurodiverse people and those with learning disabilities. These are groups that would not have the same opportunity to 'earn settlement'.

These proposals would also hold new migrants to a far higher standard than the UK's own citizens, which we believe is unfair. According to the Community Life Survey 2024-25 only 17% of adults in England and Wales volunteered at least once a month for an organisation in the previous 12 months.

Risk

These proposals, we believe, increase the risk of exploitation and modern slavery. Bad actors may exploit migrants in vulnerable circumstances, who are unfamiliar with navigating systems and processes, and desperate for volunteering opportunities in order to reduce their time awaiting settled status. We envisage scenarios of migrants being charged to find a volunteer role, paying a fee in exchange for false documentation saying they are volunteering, being trapped in a 'volunteering' role even if they are treated badly, or being forced into unpaid work for non-charitable purposes.

Alternatives

As outlined above, we object to the proposed reforms.

In our experience, people want to find paid work, and many have good English and valuable skills and should be encouraged to do that, not disincentivised if they do not earn a certain amount. There are immigrants who want to volunteer, voluntarily, and engage with their communities. This should be encouraged, without any link to settled status.

There is a wealth of expertise and experience in the voluntary and community sector. We would urge the Home Office to design any future proposals in conjunction with volunteering and immigration experts from the voluntary sector, and with people who have lived experience of the immigration system.

Conclusion

The network welcomes this opportunity to have its say on proposals which if implemented would have a significant effect on the volunteering sector.

As experts on volunteering, network members strongly urge the Home Office to carefully consider these arguments, and reconsider these proposals altogether. The network would welcome further dialogue, should that be required, and London Plus would be willing to support a continued conversation.

We would welcome early consultation with volunteering experts on any future plans on any future plans involving volunteering, just as we would welcome early consultation with immigration experts from the voluntary and community sector on future immigration reforms.

This response has been collated and submitted by London Plus, on behalf of the London Volunteer Centre network. For a list of network members, click [here](#).

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