Local Authority support to individuals and families with No Recourse to Public Funds (NRPF):

Policy considerations for Local Authorities and the Home Office

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Synopsis

Migration forms an important part of UK society, with many people living, working and settling in the UK in compliance with certain conditions of their stay or for Asylum or Human Rights reasons. However, current immigration policy heavily focuses on detecting and deterring illegal migration.

A key concern for local authorities is that the identification and disruption of illegal migration cannot always be followed by swift enforcement action and - particularly in the case of non-asylum cases - no interim support is offered by the State whilst the enforcement process is followed.

Against the backdrop of immigration exclusions and subsequent case law, local authorities have been forced to formalise the practice of providing unfunded financial assistance to families and vulnerable adults under social services legislation (referred to as ‘NRPF support’).

The financial burden to local authorities is increasing on account of restrictions applied by Central Government on areas of state provision including welfare benefits, legal aid and student finance. This trend is set to continue when the Immigration Bill introduces further measures to tackle illegal migration in 2014.

This report outlines the key issues and current ‘cost shunts’ for local authorities. It makes the following strategic recommendations:

1. Local authorities should support the work of the NRPF Network, the Strategic Migration Partnerships (SMPs) and the Association of Directors of Children’s Services (ADCS) Asylum Taskforce to collectively influence immigration policy and campaign against changes that increase expenditure for local authorities.

2. Local authorities should work towards a clear policy position in relation to the rights of children dependent on adults with NRPF, thereby addressing the inherent tension between immigration restrictions, funding gaps and the need to safeguard and protect children.

3. The Home Office should work to mitigate the impact of immigration policy on different statutory providers to ensure that the pursuit of potential savings for one department does not cause a cost shunt for another.

4. When Leave to Remain (LTR) is granted by the Home Office, this should be awarded without additional restrictions to health care or public funds; such piecemeal restrictions increase the risk of poor health and poverty and compound the local authority’s attempt to promote prosperous and safe communities.

5. Tackling illegal migration in the UK will lead to increased referrals to local authorities. The Home Office must therefore ensure that the appropriate processes are in place to assist local authorities in managing this demand, or face renewed calls for reimbursement of costs.

Headline Figures:

- Of 10 local authorities using NRPF Connect a total of £16 million per year is being spent on accommodation and subsistence services to families and individuals with NRPF.
- The average spent on accommodation and subsistence for a single NRPF case is £15,500 per annum.
- Centre on Migration, Policy, and Society (COMPAS) research indicates that there are at least 120,000 irregular migrant children living in the UK.
- NRPF expenditure is rising at a time of continued funding cuts to local authorities; for Islington this represents in 2014-2018 a further 25% cut in funding.
Background to NRPF Services

**Legislation**

Section 115 of the Immigration and Asylum Act (IAA) 1999 states that a person will have ‘no recourse to public funds’ if they are subject to immigration control; ‘public funds’ comprise of a defined list of welfare benefits and public housing.

Financial support from a local authority under community care and children’s legislation is not a ‘public fund’ for the purposes of the NRPF condition. This means that should children dependent on adults with NRPF become destitute, or adults be in need of care provided by the local authority, there may still be an entitlement to financial assistance from social services.

‘NRPF services’ therefore consist of accommodation and subsistence payments to families and individuals if eligibility is established under one of the following statutes:

- **Section 21 of the National Assistance Act (NAA) 1948:**
  1(a) - A duty to provide Residential accommodation for persons aged 18 or over who by reason of age, illness disability or any other circumstance are in need of care and attention which is not otherwise available to them
  1(aa) – A power to support expectant and nursing mothers
- **Section 17 Children Act (CA) 1989**
  A duty to safeguard and promote the welfare of children who are in need and, so far as is consistent with that duty, to promote the upbringing of such children by their families.
- **Sections 23C, 24A, 24B Children Act 1989**
  Continuing functions in respect of ‘former relevant children’ [children who have been supported under section 20 of the Children Act 1989 before their 18th birthday] to the extent that the welfare, education or training needs of the ‘care leaver’ require it.

NRPF Services are limited by the following legislation:

- **S122 (5) Immigration and Asylum Act (IAA) 1999** – families eligible for mainstream asylum support should not be financially supported by local authorities under s17 Children Act 1989.
- **Schedule 3 of the Nationality Immigration and Asylum Act 2002** – The withholding and withdrawing regulations, applies to European Economic Area (EEA) Nationals and Third Country Nationals unlawfully in the UK. This places an obligation on social services to consider return to country of origin as the limits of its powers and to consider whether the withholding or withdrawing of support will constitute a breach of 1) Human Rights, and / or 2) Rights under the Community (EU) Treaties.

**Caseload analysis**

Caseloads are predominately non-asylum focused, with visa-overstaying families being the largest group supported. In dispersal areas of the UK and amongst the leaving care cohorts, the proportion of asylum seekers supported increases. European Economic Area (EEA) Nationals are also represented, with local authorities providing social service support to out-of-work EEA nationals pending 1) re-gained access to benefits, 2) employment and / or 3) return to country of origin.

Appendix A (page 13) provides a breakdown of the 10 most common nationalities of service users; Appendix B (page 13) divides the 10 most common nationalities by immigration status; Appendix C (page 14) shows case load and costs from 10 local authorities using NRPF Connect.
1. **Local authority dependence on Home Office decision making** - The majority of NRPF cases are supported by local authorities pending the outcome of immigration decisions made by the Home Office. Local authorities can become tied to long periods of support if decisions on applications for Leave to Remain (LTR) are not decided expediently or removal processes are delayed.

- The average duration of support for cases recorded on NRPF Connect is 647 days; 80 out of 901 cases across 10 local authorities have been supported for over 4 and up to 14 years, and counting.
- **R (KA) v Essex County Council [2013] EWHC 43:** extends the principal set out in Clue v Birmingham City Council 2010 that support under s17 Children Act 1989 cannot be withdrawn by the local authority when an application for LTR is outstanding *to cases where LTR has been refused but no removal directions have been served.* This means that although Schedule 3 of the Nationality Immigration and Asylum Act (NIAA) 2002 requires a local authority to consider return to Country of Origin (COO) as the limits of its powers, case law has ruled that social services have a limited ability to enact such exclusions independent from Home Office decision making.

- Where information has been shared consistently between local authorities and the Home Office using NRPF Connect (a secure web-based data-sharing system for local authorities and the Home Office working with migrants who have NRPF) positive results have been achieved, with 107 cases being resolved by the Intervention & Sanctions Directorate (I&SD) in the last three months of operation.

**Resolving cases more efficiently - Recommendations:**

For the Home Office to act on the information being provided by local authorities over NRPF Connect, progressing local authority cases expediently through case working and removal teams.

For The Home Office and the NRPF Network to work together to ensure data-sharing is supported by agreed processes that best facilitate the resolution of supported cases and that staffing resources are sufficient to deal with demand.
2. Changes to the family migration rules, 9th July 2012 - Extending the use of the NRPF Condition:
The regulations stipulate that families awarded LTR on right to family / private life grounds (Article 8 Human Rights Act) will not be granted access to public funds unless exceptional circumstances apply.

- Introduced to reduce the impact of migration on the welfare bill, the regulations create a new ‘NRPF’ category and increased potential for referrals to social services on the grounds of destitution.
- If a family is able to evidence destitution when the application for LTR is made, *access to public funds should be granted if the application is successful*.
- The NRPF Network achieved a policy concession in respect of cases supported by the local authority; this is that financial assistance from a local authority is evidence of destitution and that access to public funds should be allowed if LTR is granted (referred to by the Home Office as Condition Code 1A).
- Despite the above policy concession, *83 cases registered on the NRPF Connect database, which represents a combined weekly cost of £27,000 for the local authorities involved, have been granted LTR with NRPF*. The NRPF Network is working with the Home Office to try to overturn the NRPF condition in these cases and to look for ways of implementing the policy more effectively in future cases.
- As of 21 January 2014, a formalised process, for families to request for the NRPF condition to be removed if a family has become destitute, has been introduced by the Home Office - this is a welcomed development for local authorities: [http://www.ukba.homeoffice.gov.uk/visas-immigration/partners-families/](http://www.ukba.homeoffice.gov.uk/visas-immigration/partners-families/)

### Implementing policy in relation to granting LTR with access to public funds – Recommendations:

Local authority cases recorded as in receipt of LA support on NRPF Connect *should not be granted leave to remain with NRPF*.

Access to public funds should not be denied if it is the local authority’s assessment that the family’s total income is not sufficient to meet the essential living needs of children.

Local authorities and the Home Office need to work towards a clear understanding of what constitutes ‘destitution’ for the purposes of the above policy concessions, this is to account for cases where the family have some form of income and are still unable to meet essential living needs.
3. Amendment of the Benefit Regulations, 8 November 2012 -Financial pressures on local authorities supporting ‘sole carers’ of dependant British nationals: Ruiz Zambrano’ (European Citizenship) 2011 in the European Court of Justice (ECJ) creates a right to reside and work for sole carers of dependant British Children. The principal of ‘Zambrano’ is that EEA national children should not be forced to leave the EEA on account of the parent / guardian’s unsettled immigration status; changes to the benefit regulations prevent such families from accessing public funds if the children become destitute.

- A quarter of families supported by local authorities under s17 of the Children Act 1989 have dependant British children. Though reducing the impact on the welfare bill by excluding such families from accessing public funds, it leaves LAs with an on-going financial burden.
- Hayet Chikhi (HC) V Secretary of State for Work and Pensions (and others) [2013] - This case concluded that an Algerian national with a British child would not be entitled to welfare benefits and housing (thereby upholding the ‘amendment regulations’ explained above). In the NRPF Network’s witness statement, focus was made on the cost to local authorities in supporting Zambrano cases:

  ‘… Nine local authorities [using NRPF Connect] are supporting 500 cases between them at a total annual cost of £7,836,945. Since over a quarter of these cases involve British children, these nine local authorities are spending in the region of £1,959,236.25 a year on Zambrano families. Again this cost does not take into account the significant staff time required from highly qualified social workers to oversee the client’s assessments and payments …. ‘

The Secretary of state for the DWP, however, successfully argued that the availability of s17 Children Act 1989 support prevented a situation whereby a family’s situation in the UK would be so sever as to contravene EU law or cause a breach of human rights on account of destitution.

- The Courts have concluded that ‘Zambrano’ does not concern any right to welfare benefit payments but where there is a strong case for remaining in the UK for the purposes of family life (Article 8 of the Human Rights Act) this should be pursued through Appendix FM (family members) of the Immigration rules. This places renewed focus on the importance of the Home Office facilitating the quick resolution of such claims.

**Resolving family cases with British National children – Recommendations:**

Local authorities would benefit from Home Office guidance in relation to the resolution of ‘Zambrano’ cases that are supported by local authorities in light of recent case law and the challenges that are likely to be faced in removing such families from the European Economic Area (EEA).

For the Home Office to use the information provided by local authorities through NRPF Connect to ensure that families meeting the requirements of Appendix FM (Family Members) of the Immigration Rules are regularised.
4. Education (Student Fees, Awards and Support) (Amendment) Regulations 2011 – Costs of Higher Education funding falls to the local authority: The local authority has a continuing duty of support to ‘care leavers’ (children who have been in the care of the local authority and have reached the age of 18) to the extent that their welfare, education or training needs require it. The above amendment means that care leaver with Discretionary Leave to Remain (DLR) are no longer eligible for student loans and bursaries to cover tuition fees.

- Subsequent to the above amendment, case law has confirmed that responsibility to provide higher education funding, where it is required by the care leaver, will rest with the local authority under the Leaving Care provisions. This represents an additional £25,000 per annum cost for each student, a figure that will see local authorities with the largest care leaver caseloads paying an additional £800,000 per year.
- This has been raised by the NRPF Network, the ADCS Asylum Taskforce and the Local Government Association in a letter to the Immigration Minister, Mark Harper, on 1st November 2013 - a response is awaited.

**Meeting the cost of higher education for care leaves with DLR – Recommendations:**

- Change university funding rules so that care leavers with NRPF who are lawfully in England can access mainstream student loans, or;

- Provide additional funding to enable local authorities to be reimbursed for tuition fees they are now legally obliged to pay, or;

- Clarify the law to prevent local authorities from having to pay university tuition fees for young people in the in the circumstances described above.
5. National Health Service (Charges to Overseas Visitors) Regulations 2011 - No exemption from secondary health care charges for NRPF cases: There is no exemption from secondary health care charges for NRPF cases supported by local authorities despite exemptions being introduced for asylum seekers and failed asylum seekers on HO asylum support; as of 9th July 2012, non-payment of NHS bills will be used as a reason to refuse applications for leave to remain made on right to family/private life grounds.

- Refusals of LTR on account of non-payment of secondary health care delays the resolution of cases and diverts attention away from the overriding ‘best interest’ of the child and Human Rights considerations of a claim.
- It is unclear what ‘savings’ can be recorded on account of billing patients who are financially dependent on the local authority in cases where secondary health care is necessary and cannot be withheld.
- The Home Office has successfully argued in case law that asylum support under s4 Immigration and Asylum Act 1999 is residual to local authority duties under the Children Act 1989; the fact that asylum seekers on one form of statutory support have access to free secondary healthcare is inequitable and impinges on health provisions overriding principles of providing equitable care according to clinical assessments of need.

**Amending the NHS Charging regulations in respect of local authority cases – Recommendations:**

The Home Office must issue clear guidance on the exceptions to refusing LTR on the basis of non-payment of bills; this must contain specific reference to when destitution is evidenced by the provision of financial support from the LA.

Exempt NRPF cases from secondary health care charges as is the case with asylum seekers and failed asylum seekers on asylum support.
6. Legal Aid, Sentencing and Punishment of Offenders Act 2012 (LASPO), 1st April 2014 – Lack of access to legal aid presents new challenges: As of the 1st April 2014, there is no legal aid available for applications for leave to remain in the UK on the basis of Article 8 of the European Convention on Human Rights (right to respect for family and private life).

- Many families supported by local authorities have strong claims to LTR on right to family and private life grounds; being unable to ‘legitimise’ these rights through a formal process will cause delays in resolving cases.
- It is an unnecessary additional burden for local authorities if they are to meet the funding gap left by LASPO in addition to providing ‘safety net’ support; it is not clear why existing exemptions in LASPO cannot be used to save the local authority this expense.
- Question arise for the local authority about whether time and money should be invested at the point of an individual’s application; at the point of appeal in the case of a refusal; and / or, to wait for removal directions to be set when the best interest of the child and human rights in respect to removal from the UK must fully be considered by the Home Office. It remains questionable as to what intervention would represent the best value for money for the UK tax payer.

**Resolving cases in light of cuts to legal aid – Recommendations:**

Section 10 of LASPO allows legal aid to be funded in ‘exceptional’ cases in areas of law that have been taken out of scope; this exception should be used in relation to local authority supported cases.

The Home Office and local authorities must collaborate on a sensible approach to managing family cases in light of legal aid restrictions and the close partnership being established over the NRPF Connect database.
7. Lack of funding for Appeal Rights Exhausted (ARE) Care Leavers: Where children have been in the care of the local authority, these responsibilities continue past the age of 18 until they are at least 21 years of age, and beyond if they are pursing further education or training. Even when immigration exclusions apply, discharging responsibilities on the basis that a care leaver can return to their country of origin presents many challenges and funding is not available whilst these issues are addressed.

- **R (SO) v London Borough of Barking & Dagenham [2010] EWCA Civ 1101:** This case confirmed that a local authority cannot rely on provision of asylum support by the Home Office when deciding whether accommodation should be provided under the leaving care provisions.

- Local authorities with a minimum number of 25 Unaccompanied Asylum Seeking Children are eligible to reclaim a grant of equivalent value of section 4 asylum support as contribution towards costs. Where claims become ‘ARE’, there is no additional funding beyond a three month period, irrespective of any barriers to removal that prevent the LA from discharging leaving care responsibilities through the completion of the Human Rights Assessment.

- Support to Care Leavers is costing local authorities on average £210,000 per annum (based on an average caseload of 14); the leaving care responsibility requires the local authority to take on the functions and responsibilities of a parent; a lack of end-of-the-line processes in respect of Care Leavers returning to their country of origin presents difficulties in planning a supported return.

- This has been raised by the NRPF Network, the ADCS Asylum Taskforce and the LGA in a letter to the Immigration Minister, Mark Harper, on the 1st November 2013 and a response is awaited.

**Addressing funding concerns and end-of-the-line processes for ARE Care Leavers – Recommendations:**

Consider adopting innovative approaches such as the Positive Futures pilot which is being developed between Kent County Council, the Foreign Commonwealth Office and Strategic Migration Partnership (SMP) for the South East of England in the establishment of voluntary return programmes for Care Leavers.

Continue the Home Office grant where ARE Care Leavers have a barrier to removal in place and cannot leave the UK or have no barrier and are complying with return to country of origin.
8. ‘Stop-gap’ support being provided to asylum seekers in dispersal areas of the UK: Local authorities are forced to meet the welfare needs of families in interim periods before and after asylum support is accessed; this adds another layer of expenditure in addition to the non-asylum cases supported by local authorities.

- Data from one local authority user of NRPF Connect indicates that in 2013/2014 at least £30,000 will be spent providing 60 cases with stop-gap support whilst access to asylum support is established.
- Funding gaps arise prior to families claiming asylum, with the cost of travel to the asylum screening unit in Croydon needing to be met and financial support provided whilst applications for asylum support are processed.
- Funding gaps occur at the end of the asylum process when families are awarded Leave to Remain and asylum support is withdrawn within four weeks of the decision; Home Office policy for the withdrawal of asylum support bears no correlation to the time needed to access welfare benefits, a process that can often take much more than four weeks to achieve.

Reducing the cost in providing stop-gap support to asylum seekers – Recommendations:

Local authorities must be reimbursed for the cost of providing interim support to families claiming asylum in the UK, including the cost of travel and associated expenses for attending the Asylum Screening unit in Croydon; such costs are clearly documented on NRPF Connect.

In line with the Home Office’s safeguarding duty to children, financial support to families awarded leave to remain should not be withdrawn until access to welfare benefits is established, thereby preventing children being subjected to destitution on account of administrative delays on behalf of Central Government.
Background to the NRPF Network

Since its establishment in 2006, the NRPF Network has been working in partnership with the Home Office to address the concerns of local authorities around the support provided by social services departments to migrants who are subject to the ‘no recourse to public funds’ condition. This support effectively constitutes a parallel welfare system (in much the same way as asylum support) operated by social services departments for a particular client group, most of whom are awaiting immigration decisions.

Seven years later, there is a much better understanding of the NRPF client group, trends and patterns of support in different parts of the UK, the needs of clients and supporting organisations, and the policy framework that needs to be in place to 1) safeguard vulnerable adults and children and 2) run efficient services.

The NRPF Network provides free guidance and information in relation to local authority duties to people with NRPF. Supported by the Strategic Migration Partnerships (SMPs), the NRPF Network encourages participation of local authorities in regional meetings across the UK both to help disseminate information to frontline staff and to be informed of new issues impacting on service provision. The NRPF Network has developed the NRPF Connect database in partnership with the Home Office in order to provide a more robust structure for sharing and recording information on NRPF cases and working to resolve cases more expediently.

The NRPF Network is hosted by Islington Council and the Steering Group consists of representatives from the SMPs and local authorities from each region of the UK. The NRPF Network meets the direct staffing overheads of the organisation through income generation, £50,000 of which is achieved through delivering training to local authorities and a further £25,000 per annum will be raised from NRPF Connect user charges.

Conclusion

Regardless of whether the Immigration Bill has the desired effect of reducing illegal migration in the long-term, local authorities are concerned with the pressures of supporting irregular migrants that exist now and the potential for increased costs if current trends continue.

Despite high caseloads, 2014 also presents local authorities and the Home Office with a real opportunity to tackle the main components of NRPF service provision. This ranges from the practical process of logging and recording cases consistently to addressing specific areas of immigration policy that either increase demand for local authority support or delay the resolution of existing cases.

With the ability to properly monitor performance and trends through the NRPF Connect database, The NRPF Network looks forward to working with local authorities and the Home Office towards the shared objective of reducing local authority case loads and spend.
Appendix A: NRPF caseload by Nationality of Principal Applicant

10 most common nationalities of clients - all LA's

- Chinese: 125
- Gambian: 16
- Ghanaian: 18
- Iranian: 18
- Jamaican: 22
- Malawian: 21
- Pakistani: 96
- Zimbabwean: 34
- EEA National: 14
- Nigerian: 130

Appendix B: NRPF Caseloads by Immigration Status of Principal Applicant

Status of 10 most common nationalities, all LA's

- Chinese
- Congolese
- Gambian
- Ghanaian
- Iranian
- Jamaican
- Malawian
- Nigerian
- Pakistani
- Zimbabwean

Legend:
- Unknown
- Post Case
- Over-stayer / Deception/Breach
- Limited Leave (including 3C applications and visas)
- Limited Leave - with NRPF
- Indefinite Leave
- Illegal Entrant (inc in-country asylum applicants)
- FNP Foreign National Prisoner
- EEA National / Dependant
### Appendix C: Numbers of NRPF cases and costs for 10 local authorities using NRPF Connect

<table>
<thead>
<tr>
<th>Legislation</th>
<th>Total number of households supported since 1st April 2013</th>
<th>Projected annual expenditure at year end (31st March 2014)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>London - LA1</strong></td>
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<td></td>
</tr>
<tr>
<td>All Cases</td>
<td>185</td>
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<td>All Cases</td>
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<td>£ 1,613,331.76</td>
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<tr>
<td>S21 (1) (a) NAA 1948</td>
<td>24</td>
<td>£ 215,953.45</td>
</tr>
<tr>
<td>S21 (1) (aa) NAA 1948 (expectant / nursing mothers)</td>
<td>1</td>
<td>£ 7,863.24</td>
</tr>
</tbody>
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