Citizens UK response:

Call for evidence on the Home Office's approach to charging for services



"Immigration and citizenship applications are a huge concern to many of our students. Most of the children affected have lived in Britain their entire lives and now their parents – the majority of which are in low paid jobs – are forced to go to upsetting lengths to save for costly citizenship fees."

Fiona Carrick-Davies, Family & Community Co-Ordinator, Surrey Square School

BACKGROUND

This document provides Citizens UK's response to the Independent Chief Inspector of Borders and Immigration's calls for evidence on the inspection into the Home Office's approach to charging for its services. Citizens UK has independently conducted research into child citizenship fees in the UK and in the EU-15.

Our research looked exclusively at the cost to register or naturalise children under the age of 18. Please note that the use of terminology varies depending on preferred term in the respective country and therefore the research in this document includes a mixture of both.

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I. SUMMARY OF OUR FINDINGS

UK Home Office fees to register children under the age of 18 as British Citizens have increased by £500 since 2011, making it the most expensive place in the EU-15 for a child to acquire citizenship.

Our research found that, when comparing the EU-15 (which includes the top five economies in Europe), the UK's registration fees are more than ten times higher than those of Spain, France, Belgium, Sweden, and Denmark, and **nearly double the fees of the next most expensive country, Greece**.

We also found that, on top of disproportionately high citizenship fees, there are additional hidden costs to obtaining citizenship in the UK: fees to provide biometric information (£19.20) and attend a citizenship ceremony (£80) if a child turns 18 during the application process. These additional fees can add hundreds of pounds to the already prohibitively expensive cost of citizenship applications for families and young people.

By the Home Office's own estimation, administration and processing costs for such applications are £372 * (1) This means that almost two-thirds of the cost of a child citizenship application is profit for the Home Office.

II. RECOMMENDATION

The high cost of child citizenship can have devastating effects for those families on low incomes. The expensive fees often mean that families are either priced out of applying for citizenship or that they are going to extreme lengths to pay for citizenship fees (e.g. being pushed into debt, working multiple jobs on low wages, going without food, taking out pay day loans).

Citizens UK advocates for a reduction in Home Office fees for children so that the amounts charged are based on actual cost of processing (approximately £372). The current price of citizenship means that the Home Office make an excessive profit off the back of the fees.

[1]https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691200/Fees_Unit_Cost_Table_-_April_2018.pdf



III. KEY FINDINGS

- The cost of citizenship for a child under the age of 18 is £1,012 in the United Kingdom. This cost is significantly higher than all other EU-15 countries we researched for this report.
- The cost of child citizenship in the four EU countries with the largest GDP outside of the UK (that is, Italy, Spain, France, Germany) is a fraction of the cost of citizenship in the UK. For example, in Germany the cost ranges from €51 (£45) to €255 (£227) depending on whether the application is made in conjunction with or without a parent's application, respectively. This demonstrates that, unlike the UK, the four largest economies in the EU don't need to rely on profit made from citizenship applications by often vulnerable people.
- The EU member state with the second most expensive fees is Greece, where the cost of citizenship by naturalisation is €700 (approx. £625). This is just over half the cost of the UK process, and other pathways to citizenship (e.g. by birth, adoption, or for citizens of EU member states) are either free or cost €100 (approx. £89).
- In Luxembourg and Denmark it is free for a child to become a citizen through naturalisation (2,3). Similarly, there are no fees for citizenship applications in Belgium and France, although applicants do incur minor stamp duty or provincial fees.
- In the UK, there are hidden costs to obtaining citizenship on top of the £1,012 that the Home Office demands, such as the cost of attending a citizenship ceremony (£80) if a child turns 18 during the application process.
- In addition, if the application is refused, applicants are not given a refund.
 If families or children want to re-apply for citizenship, they must pay the fee again.
- Citizenship fees often come at the end of a process that has already been very expensive;

A family with two children who have sought permission to stay on a ten-year route to settlement and have then accessed citizenship for all members would have paid out nearly £30,000 by the time they become British citizens, taking account of all immigration fees. This would include each family member's costs for initial leave to remain, assuming they were applied for four times, then costs for indefinite leave to remain and then £1,012 for the children to become British. In addition, families would then need to pay for a passport.

[2]https://guichet.public.lu/fr/citoyens/citoyennete/nationalite-luxembourgeoise/acquisition-recouvrement/naturalisation.html#bloub-3

[3]http://uim.dk/arbejdsomrader/statsborgerskab/statslose-fodt-i-danmark-1/personer-fodt-statslose-i-danmark-som-er-under-18-ar-pa-ansogningstidspunktet



IV. BENCHMARKING OF CITIZENSHIP COSTS

While not all countries use the same definitions, classifications, or offer the same pathways, most EU-15 countries offer children under 18 opportunities for citizenship through some form of registration or declaration, or through a process of naturalization.

Please note that this benchmarking presents a list based on publicly available information regarding citizenship for children under 18 as of July 2018; it does not represent a complete picture of the journey to citizenship for children.

COUNTRY	CHILD CITIZENSHIP COST
ltaly*	N/A
Denmark	Free [4]
Luxembourg	Free ^[5]
Belgium	Free
France**	Free
Spain**	€102 [£91] [©]
Netherlands**	€21-€128 [£19-£114] ^[7]
Ireland	€175 [£156]
Portugal	Free - €200 [Free - £178]
Austria	€200 [£178]
Sweden	SEK 175 - 1,500 [£15 - 130] [8]
Germany	€51 - €255 [£45 - £227] ^[9]
Finland	Free - €440 [£392] [10]
Greece	Free - €700 [£625] [11]
United Kingdom	£1012

- Does not include additional or ancillary costs
- ' Cannot apply if under 18
- ** Cannot apply if under 18 without parental representation and/or as part of a parent's application
 - [4] http://um.dk/en/travel-and-residence/payment-for-services/
 - [5]https://guichet.public.lu/fr/citoyens/citoyennete/nationalite-luxembourgeoise/acquisition-recouvrement/naturalisation.html#bloub-3
 - [6]http://www.mjusticia.gob.es/cs/Satellite/Portal/es/ciudadanos/tramites-gestiones-personales/nacionalidad-residencia
 - [7] https://ind.nl/en/Pages/Costs.aspx#Becoming_a_Dutch_citizen
 - [8] https://www.migrationsverket.se/English/Private-individuals/Becoming-a-Swedish-citizen/Fees.html
 - [9] http://www.germany-visa.org/german-citizenship/
 - [10] http://migri.fi/en/processing-fees-and-payment-methods
 - [10] http://migrimen/processing-rees-and-payment-methods
 [11] http://eudo-citizenship.eu/admin/?p=file&appl=currentCitizenshipLaws&f=GRE%20Citizenship%20
 Code%20%28as%20of%202010%2C%20English%29.pdf



COUNTRY	COST FOR CHILDREN	ADDITIONAL COSTS	SOURCE
Austria	€200 federal fee (approx. £178)	Admin. fees vary by province, e.g. €76 in City of Vienna (approx. £68)	Fees: https://www.wien.gv.at/ english/administration/ civilstatus/citizenship/ fee.html
Belgium	No application fee for minor children	Local authority fees of €50 (£44) may apply	Fees: https://www.brussels. be/belgian-nationality
Denmark	No fee if applicant is under 18		Overview: http://uim.dk/arbejd- somrader/statsborger- skab/born-1/borns-erh- vervelse-af-dansk-stats- borgerskab-som-hoved- personer
Finland	€440 (approx. £386) for paper-based application, €350 (approx. £309) for electronic application €100 (approx. £89) for paper-based declaration, €80 (approx. £71) for electronic Free for children who are co-applicants in a parent's application or declaration		Information about child citizenship: http://migri.fi/en/citizenship-for-a-child Fees: http://migri.fi/en/pro-cessing-fees-and-pay-ment-methods
France	No application fee for citizen- ship. Only those who are 18 can apply. Minors aged 14-18 can apply with parental representation.	Stamp duties of €55 are levied on all applications (approx. £49)	https://www.ser- vice-public.fr/particuli- ers/vosdroits/F2213



COUNTRY	COST FOR CHILDREN	ADDITIONAL COSTS	SOURCE
Germany	€51 for children under 16 who are to be naturalised with their parents (approx. £45) €255 for children under 16 who are to be naturalised without their parents (approx. £227)	€25 Citizenship certificate (approx. £22) €25 Naturalisation/ Citizenship test (approx. £22). Children under the age of 16 are exempted from this tes	Overview: https://uk.diplo.de/ uk-en/02/german-citi- zenship/obtaining-ger- man-citizenship Fees: http://www.germany-vi- sa.org/german-citizen- ship/
Greece	€700 fee for naturalisation (approx. £625) €100 fee for certain groups, e.g. stateless persons (approx. £89) Free for certain types of citizenship, e.g. by birth or declaration (approx. £89)		Citizenship code: http://eudo-citizenship. eu/admin/?p=file&ap- pl=currentCitizen- shipLaws&f=GRE%20 Citizenship%20Code%20 %28as%20of%20 2010%2C%20English%29. pdf Additional information: https://ec.europa.eu/ home-affairs/sites/ homeaffairs/files/ what-we-do/networks/ european_migration_net- work/reports/docs/ ad-hoc-queries/ad-hoc- queries-2015.709_be_fees_ for_citizenship_wider_dis- semination.pdf
Ireland	Applications for minors under 18 must be made by parents or guardian €175 application fee for natural- isation (approx. £156) €200 certification fee for chil- dren if application is successful (approx. £179)		Overview: http://www.inis.gov. ie/en/INIS/Pages/ WP16000022#fees

COUNTRY	COST FOR CHILDREN	ADDITIONAL COSTS	SOURCE
Italy	Not eligible to apply. Fees for adults are €300 (approx. £263)		Overview: https://www.esteri.it/ mae/en/servizi/stranie- ri/cittadinanza_0.html Fees: https://conslondra. esteri.it/consola- to_londra/en/in_linea_ con_utente/info_utili/ tariffe_consolari/tar- iffe-consolari.html
Luxembourg	There is no fee related to citizenship applications by option or by naturalisation	Filing of certain documents incur stamp duties of €2-4 (approx. £1-4)	Fees for naturalisation: https://guichet.public.lu/ fr/citoyens/citoyennete/ nationalite-luxembour- geoise/acquisition-re- couvrement/naturalisation.html#bloub-3 Fees for citizenship by option: https://guichet.public.lu/ fr/citoyens/citoyennete/ nationalite-luxembour- geoise/acquisition-re- couvrement/option.html Nationality law reform: http://www.luxembourg. public.lu/en/actual- ites/2016/03/14-na- tionalite/index.html
Netherlands	€128 fee for a child under 18 who is part of a parent's natu- ralisation request (approx. £114)		Fees: https://ind.nl/en/Pages/ Costs.aspx#Becom- ing_a_Dutch_citizen
	€21 fee for a child under 18 who is part of a parent's declaration request (approx. £19)		



COUNTRY	COST FOR CHILDREN	ADDITIONAL COSTS	SOURCE
Portugal	€200 for minors with parent who has acquired Portuguese citizenship, or who were born in national territory (approx. £178) Free for minors for whom		Overview: https://ec.europa.eu/ home-affairs/sites/ homeaffairs/files/ what-we-do/networks/ european_migration_ network/reports/docs/ ad-hoc-queries/ad- hoc-queries-2015.709_ be_fees_for_citizenship_
	nationality is granted following a statement by the parents or to prevent statelessness		wider_dissemination.pdf
Spain	€102 (approx. £91). Minors under 18 can only apply through parental or legal		Overview: http://www.mjusticia. gob.es/cs/Satellite/ Portal/es/ciudadanos/ tramites-gestiones-per- sonales/nacionali-
	representation.		dad-residencial
Sweden	SEK 175 for citizenship by notifi- cation (approx. £15)		Overview: https://www.migra- tionsverket.se/English/ Private-individuals/ Becoming-a-Swed-
	SEK 1,500 for applications that do not fall under category of		ish-citizen/Citizen- ship-for-adults.html
	'notification' (approx. £130) v		Fees: https://www.migra- tionsverket.se/English/ Private-individuals/Be-
	Free for children under 18 years of age if part of parent application.		coming-a-Swedish-citi- zen/Fees.html
United Kingdom	£1,012 for a child under 18	v£80 citizenship ceremony	Fees: https://www.gov.uk/gov-
	applying to register as a British citize	fee if child turns 18 during application process	ernment/publications/ fees-for-citizenship-ap- plications
		£19.20 Biometric informa- tion	

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