

Applying for a fee waiver for a child's British citizenship application

A Guide prepared by KIND UK

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KIND UK strongly recommends that British citizenship applications for children and fee waiver applications are completed with the assistance of qualified, competent legal advisers. This guide may be useful for advisers who are new to doing fee waiver applications.

We also hope this guide will help applicants who are unable to access legal advice work out whether they are eligible for a fee waiver, and if they are, to submit the best fee waiver application they can.

If a fee waiver application has been refused, it is important to consider whether it was because the applicant is not eligible for a fee waiver or because they did not send all the necessary documents. If the problem was the documents, it may be worth applying again with more documents.

KIND UK is mainly a *pro bono* legal advice project – a collaboration of charities and corporate law firms. We also have a clinic at Birmingham City University. KIND UK may be able to assist children and young people who cannot afford to pay for a legal adviser with applications for leave to remain or British citizenship, and related fee waiver applications. Referrals to the KIND UK project can be made [here](#). We operate a waiting list, and it may be approximately 6-9 months or longer before we can begin to assess a case, but we can sometimes assist more quickly.

Nothing in this guide constitutes legal advice.

What is a citizenship fee waiver application?

A person who cannot afford to pay the usual fee for a child's British citizenship application can ask the Home Office to waive the fee. In this guide, we will call this the 'fee waiver application'.

Which children are eligible to apply for a fee waiver for a citizenship application?

In June 2022, the Home Office introduced the possibility of applying to waive the fee for children's citizenship applications if the child's parents or carers **cannot afford to pay the fee**. The Government also introduced an **exemption** from the fee for children who are **in the care** of a local authority.

Key points:

- The **citizenship** fee waiver and exemption are only for **children (under 18)**. Fee waiver applications **must** be submitted before the child's 18th birthday. There is no fee waiver for adults' *citizenship* applications.

- The fee waiver and exemption are available for any type of child's citizenship application where a fee normally applies.
- Children who are 'in need' and receiving support under Section 17 of the Children Act (England) (or similar laws in other regions of the UK), or who are receiving welfare benefits are usually eligible for a fee waiver, but they must submit evidence to show they cannot afford to pay the fee.
- There are also fee waivers for some *immigration* applications for applicants who cannot afford the fees. This guide relates to fee waivers for *citizenship* applications, but much of the information is also relevant for immigration fee waivers.

Important links

- The link to apply for a fee waiver application online is [here](#) and instructions about how to apply by post are available [here](#).
- Home Office Guidance about children's citizenship fee waiver applications is available [here](#).
- Home Office guidance about the requirements for children to register as British citizens is available [here](#).
- KIND UK's guides about children's routes to immigration status and British citizenship are available [here](#).
- Legal practitioners may find it useful to watch this 2022 [KIND UK training webinar](#) about citizenship fee waiver applications. Please note: some details may have changed since this webinar.

Which children are eligible for British citizenship?

A child who is not a British citizen at birth may become eligible to register as a British citizen (we call this a 'citizenship application' in this guide). Some of the ways include:

- **Parent settles or naturalises:** Child born in the UK, is under age 18, and a parent is 'settled' in the UK (for example has indefinite leave to remain or EU Settled Status) or naturalizes as a British citizen.
- **Birth in UK + 10 years residence:** Child born in the UK and continuously resident in the UK for first 10 years of life. Can apply for citizenship at any age if requirements are met (but is only eligible for fee waiver if application is submitted before 18th birthday).
- **Birth in UK + stateless:** Child born in the UK, is and has always been stateless, is under age 22 and continuously resident in the UK for the past 5 years. 'Stateless' means the child is not considered a citizen of any country.
- **Discretionary:** Child has strong connection to the UK, British citizenship is in their best interests, and they are under age 18. This could apply, for example, to a child who was not born in the UK but who has lived in the UK for several years. There is some flexibility in this route to citizenship. It is called the 'discretionary' route because the Home Office has some discretion about whether to grant citizenship based on how strong the child's ties to the UK are; but the Home Office must follow its guidance and make fair decisions on such applications.

There are **residency** requirements and a **good character** requirement for people over age 10 for most routes to British citizenship.

Illegal Migration Act 2023: the **Illegal Migration Act 2023** says that some children can never be granted leave to remain in the UK or British citizenship, if they arrived in the UK on or after **7 March 2023** without a visa or in a way which involved deception, unless they are eligible for an exception to these provisions. Children who may be affected by this law need advice from a qualified legal adviser.

Please see our explainers about British citizenship for more information, a summary of children's routes to immigration status and British citizenship, and our briefings about the Illegal Migration Act, available [here](#).

Joy*, 10 year route to British citizenship for a child in need

Joy was born in the UK in 2013. She has lived in the UK her whole life, with her mother, Grace. Joy has never had any contact with her father. By 2023, Joy and Grace had leave to remain in the UK, and Joy was now entitled to British citizenship, as a child who was born in the UK and lived here for the first 10 years of her life. A law firm that works with the KIND UK project, Reed Smith, assisted Grace with her citizenship application.

When preparing her citizenship application, Joy and her mother were in a difficult financial situation. Joy had been assessed by their local council as being a 'child in need', and they were receiving support under Section 17 of the Children Act (England) 1989 to prevent destitution (£77 per week). They were also receiving a little help from food banks, friends, and their church. Their outgoings were typical for a family surviving on a very low income.

For the fee waiver application, Reed Smith submitted bank statements showing all income and expenditure. This was straightforward due to their circumstances and because Grace had only 1 bank account. They also submitted short statements detailing Grace and Joy's situation and pressures caused by the cost-of-living crisis. Grace and Joy would not have known what to submit for the fee waiver application if they hadn't had help.

Joy's fee waiver application was granted in October 2023 and her citizenship application submitted soon after. As of February 2024, she was waiting for a decision on her citizenship application, which should be granted as she has a statutory entitlement to British citizenship.

Joy feels British, speaks with a South London accent, and living in the UK is all she has ever known. Being recognised as a British citizen means everything to her. It will help her maintain a sense of belonging in the UK, provide validation and security, and allow her to access opportunities that might be unavailable if she didn't have British citizenship.

Case study provided by Georgia Crossman, Reed Smith.

*All names in this document have been changed to protect privacy

How much does British citizenship cost?

The fee to apply to register a child as a British citizen went up on 4 October 2023 from £1,012 to **£1,214**.

There is an **£80** ceremony fee for everyone who is over 18 at the time of being granted citizenship, even if they were under 18 when they applied (unless a fee waiver is granted – more about this below). Some applicants may need to pay a biometric enrolment fee if there are no free appointments available.

The fee for most adults applying for British citizenship is £1,500 (from 4 October 2023). Most adults also have to pay additional fees for the English language test (from £150) and Life in the UK test (£50), but children are exempt from these.

Which children can get a fee waiver?

A fee waiver should be granted if the child (or their family) can demonstrate that they **cannot afford to pay the fee**. This means the Home Office will assess:

- the income and savings available once accommodation and essential living needs for the child, parents and other dependents have been met; and
- whether the family can pay or save up for the citizenship application fee in a reasonable time (about 6 months, or before a child turns 18 if they will lose a route to citizenship at that age).

The child (or the people helping them apply) must submit evidence of the family's financial situation. The Home Office will consider things like: how the family meet their essential needs; what sources of income are available; any extra income; savings; and whether they are financially dependent on someone who can afford to pay the fee. It is important for the applicant to provide enough documents so their application can be assessed properly. There is more information below about which documents should be submitted.

What does the Home Office consider as 'income'?

The type of income available to an applicant and their family will depend on the specific circumstances. This can include:

- Employment income, including wages and salary from full or part time employment or income from self-employment
- Welfare benefits
- Section 17 support payments
- Donations from charities, friends or family

What are 'essential' needs?

Some examples of essential needs include: housing, food, household utilities (for example: gas, electricity, water, council tax) and clothes, toiletries, non-prescription medication, household cleaning items, and travel and communication to maintain interpersonal relationships and access a reasonable level of social, cultural and religious life (this could include costs of wifi, a phone, and travel tickets/passes and/or expenses relating to a bike or car). The amount spent on these essential needs must be 'reasonable'.

What about money spent on gifts? The Home Office guidance does not say anything about money parents spend on gifts. We think it's reasonable for parents to buy gifts for their children; this is an issue affecting children's emotional well-being and sometimes their education. What is reasonable will depend on the nature of the gift and the age of the child.

What is reasonable? If parents together earn £1,500 per month, spend £800 on rent, £600 on food, gas, electric, water, council tax, transport, phones, wifi, cleaning and personal hygiene items, and other

essentials, and saved up to buy books and toys for Christmas for their 2 children, costing £50 per child, this seems ‘reasonable’ in their circumstances. But if they spent £500 on a toy car for their child, given their financial situation, that might not be considered reasonable. However, if they saved up and bought a £300-400 laptop for their child who is studying for GCSEs or A-levels, this should be considered reasonable as it is important to the child’s education and well-being.

Is there a maximum amount allowed for rent or mortgage or other expenses?

The Home Office guidance does not set a maximum amount for how much the child’s family pays for rent or mortgage, or for other reasonable costs.

Does it matter if the child’s parents are working?

No. The child’s parents can be working or not working and be eligible for a fee waiver. A parent is not required to get a job, or to stop working, in order to qualify for a fee waiver. What matters is the family’s current income and savings.

Alex and Kiran, siblings born in UK, working parents

Alex and Kiran are siblings who were born in the UK and were aged 4 and 8 years old in 2023. They have lived in the UK their entire lives, and reside with their mother, father and younger sister near Manchester. Both siblings had indefinite leave to remain in the UK prior to applying for British citizenship. Solicitors at Eversheds Sutherland, who work with KIND UK, prepared fee waiver applications and British citizenship applications for Alex and Kiran in 2023.

At the time the fee waiver and citizenship applications were being prepared, Alex and Kiran’s parents were both working. They were receiving child benefit and universal credit, and a small amount of support from the government’s Energy Bills Support Scheme. They had no other income, no assets (other than usual household items), and no savings. They had a total net monthly income of about **£3,100** and **monthly outgoings of about £3,200** (expenses such as rent, car/travel expenses, gas and electricity, food, clothing, utility bills, as well as council tax, loan repayments, extra-curricular activities, educational expenses and NHS prescriptions). They also had approximately £2,900 in debt. They could not afford to pay the fees (**£2,024**) for Alex and Kiran’s British citizenship applications.

Alex and Kiran’s parents provided documents showing their financial situation, including wage slips, bank statements, benefits statements, rental agreement, utility statements, council tax statements, and evidence of food, transport, loan repayments and other expenses. Their solicitors prepared the application forms and a letter and financial diary which explained the family’s income and outgoings over the six-month period prior to the application. When they had everything ready, the solicitors submitted the applications and supporting documents. Alex and Kiran’s parents would not have known what to submit for the fee waiver or citizenship applications if they hadn’t had legal assistance.

The fee waiver and citizenship applications were granted by the Home Office about 2 months after they were submitted. Alex and Kiran are now British citizens and can grow up knowing that they belong in the country in which they were born.

Case study provided by Georgia Mitchell, Eversheds Sutherland

What if 2 or more siblings are eligible for citizenship at the same time?

Home Office guidance says that **separate fee waiver applications** should be submitted for siblings. If more than one sibling is eligible for British citizenship at the same time, it may help the family if they submit the fee waiver applications **at the same time**, because if fee waiver requests are made at the same time for siblings, the Home Office should look at whether the family as a whole can afford to pay for both (or multiple) applications.

A fee waiver request form should be completed for each child and submitted with evidence of the financial circumstances of all members of the household as detailed in the fee waiver request form.

If 2 siblings apply for fee waivers at the same time, the Home Office can approve a fee waiver for only one child if the family could afford to pay the citizenship fee for one but not both children. Fee waivers will generally be issued to the oldest child first (this reduces the risk of older children turning 18 and losing their right to register for citizenship and/or be eligible for a fee waiver). If one of the children's citizenship applications is more urgent for some reason, then this should be clearly stated on the fee waiver application.

Annika, Sara, and Mick – half-siblings, children in need

Through the KIND UK project, Covington & Burling is assisting Sara (age 16), Mick (age 16), and Deena (age 14), all cared for solely by Annika. Sara and Deena are Annika's biological daughters. The children all have the same biological father, but Mick is not Annika's biological son. However, Annika has looked after Mick since he arrived in the UK at 16 months old. Neither of Mick's biological parents live in the UK. Annika has delegated responsibility for Mick (in the form of a private fostering arrangement) and is in the process of formalising her caring responsibilities for Mick. Mick has not been taken into care by his local authority (he is not a 'looked after' child).

By 2023, Annika, Sara, and Mick had been living in the UK for approximately 15 years and all had leave to remain in the UK. Sara and Mick were eligible to apply for British citizenship on the '[discretionary route](#)', as children under age 18 who have a strong connection to the UK. Deena was born in the UK and has already been granted British citizenship.

The family previously faced severe financial difficulties, at a time when Annika did not have leave to remain or permission to work in the UK. Annika accumulated more than £9,000 of debt, and the family was threatened with eviction by their landlord. As they were destitute and Annika was not eligible for Universal Credit and other benefits, she applied to the council for support under Section 17 of the Children Act 1989. The council assessed the family and found that the children were 'children in need' and eligible for financial support. Annika was later able to obtain a debt relief order ("DRO") with help from Citizens Advice, and her debt was cancelled. [A DRO is an alternative to bankruptcy for people with limited assets and little, if any, income beyond that required to meet their reasonable needs.]

Annika now works full-time in a store. Sara and Mick both have part-time jobs as well. They are on their way to self-sufficiency but continue to receive some benefits for now.

When preparing Sara and Mick's British citizenship applications, for the past 6 months, the family's average monthly income from work and other sources (such as Universal Credit, child benefit, and cost of living payment) was £3,700. Their usual monthly expenses amounted to £3,570 and included:

- Rent: £1,200
- Council tax: £70
- Transport: £120
- Utilities: £100
- Food: £900
- Clothing: £400
- Mobile phones and internet: £150
- TV: £20
- Insurance: £40
- School-related items: £100
- Sports and entertainment: £50
- Household items, toiletries, miscellaneous: £420

They had around £130 left each month if they didn't have any unusual expenses. The fees for Sara and Mick's citizenship applications would have been £2,024. It would have taken the family over 15 months to save this amount. Annika had £1,200 in a savings account for emergencies, which she has been building up over time and adding small amounts when possible.

[Home Office guidance](#) states that if siblings are applying for citizenship at the same time, and the family can afford to pay for only one child's citizenship application fees, the eldest child will be granted a fee waiver but not the younger child. Annika's savings could have been used for one of the citizenship applications; therefore, as the eldest child, only Sara was eligible for a fee waiver.

Case study provided by Olivia Scalise Gaspar, Covington & Burling.

Parent making a citizenship or immigration application at the same time as a child

There is no fee waiver for an adult's citizenship applications; but if an adult family member is making an immigration or citizenship application around the same time the child is applying for a citizenship fee waiver, the Home Office should consider the cost of the adult's application when deciding whether the family can afford to pay for the child's citizenship application.

Parent and children applying at the same time

Sal and Lou are refugees and have 4 children, ages 9 (Len), 10 (Ken), 12 (Ben), and 16 (Pen), all born and living in Birmingham. Sal was granted indefinite leave to remain in the UK 2 years ago, and all the children became entitled to register as British citizens at that time. Sal is eligible for British citizenship and wants to apply for herself as well as for the children. Lou has refugee status.

Sal and Lou are both working. For the past 6 months, their total income from work, child benefit, and other sources was **£2,700** per month after tax. Their usual monthly expenses come to a total of **£2,670**, for rent, council tax, utilities, wifi and phones, transport, sports and educational activities, toiletries, clothing and household items. They have £30 remaining each month if they don't have any extra expenses. To save up for 1 child's citizenship application would take nearly 3 years. They have £1,500 in savings, which they have been building up over 5 years, adding small amounts when they could.

Sal's citizenship application will cost £1,500 (from 4 October 2023), plus she will have to pay additional amounts for an English language test, Life in the UK test, and citizenship ceremony fee. Because there is no fee waiver for adult citizenship applications, they have decided to use their savings to pay for Sal's application and are borrowing the rest of the money needed for the related costs.

The family cannot afford to pay for the children's citizenship applications. If Sal and the children apply at the same time, the Home Office should grant fee waivers for all the children's applications. If Sal doesn't apply for citizenship at the same time as the children, then the Home Office would likely grant fee waivers for the 3 oldest children, but not the youngest, as the family could afford to pay the fee for 1 application.

[*hypothetical but realistic example]

How much detail must be provided for a fee waiver application?

It is important that applicants provide a full picture of their financial situation when applying for a fee waiver. They will need to provide information and evidence of all their family expenses, savings, and income, from all sources, for the past 6 months. This should include information for all people in the household or responsible for the applicant's support. For example, if a child's single mum is receiving benefits but pays rent, council tax, and utilities, they need to provide letters or statements showing how much they pay for each of these. If their dad lives separately but has financial responsibility, they should provide information about his financial situation, if possible

Applicants should provide **accurate** estimates for any expenses they are not sure about. They should not over or under-estimate.

If there are any unusual amounts, these should be explained – for example, if the applicant or a family member borrowed money from a friend or paid back a loan in the last 6 months, they should explain. If other people have provided money to the applicant or family members responsible for them, the online system will ask for confirmation that letters from the people who loaned the money will be provided. However, it may not be reasonable to expect letters from people who provided only small or occasional gifts. These can instead be explained in a witness statement from the applicant. If there is a reason the applicant or their family cannot reasonably get a letter from a person who provides money or support to them, it would be helpful to explain this - for example, if the applicant is worried that contacting someone who loaned them money would trigger them to ask for repayment of a loan they cannot afford to repay. It is also helpful to make it very clear if payments were a one-off, and if that person would not be able to assist with paying the fee for the citizenship application.

Is it necessary to send the Home Office statements from all bank accounts?

Yes! Applicants should submit statements from all bank accounts held by any member of their immediate family (in their household), including children’s accounts. Even if there is no money in the account or the account cannot be accessed, it is important to provide proof of this. Some applications may be refused because the Home Office becomes aware of a bank account for which no statements have been provided. Any transactions over £100 which are not for an identified item (such as rent or utilities) should be explained. If a parent is not involved in a child’s life and cannot be contacted or refuses to provide any financial information or documents or pay for the child’s citizenship application, this should be explained.

Credit checks

The Home Office may do a credit check which will show details about a person’s financial situation. If someone is not sure how many bank accounts they have or may have forgotten about old ones, they can do a free online credit check to make sure that they have not forgotten any old, unused accounts. You can find out how to do a credit check [here](#).

What if there is money in a trust or other account that cannot be accessed?

Some children or parents may have money in an account, such as a child trust fund, that cannot be accessed until the child is 18 or older, or for a certain number of years. In this situation, they should get a copy of the terms and conditions for the account showing that they cannot access it, and submit this with their fee waiver application.

What if a parent has more money than usual because they have been saving up for something?

If the parents have more money than usual in the 6 months leading up to submitting the fee waiver application, they should explain this in a statement and submit it with the application. Whether this will affect the decision about the fee waiver depends on the circumstances.

If Parna saved £300 from March to August to pay for school uniforms for her 3 children, this money should not necessarily make her ineligible for a fee waiver, if she now has just over the amount of the citizenship fee in savings. However, if Parna has saved £1,500 to go on holiday, then this might mean the Home Office could decide that at least one of her children is not eligible for the fee waiver, because she has saved enough to pay the fee, and the holiday is not ‘essential’. But if Parna went on holiday a year ago, and has no more savings, this is not relevant now.

What documents (evidence) should be submitted with a fee waiver application to show income and expenditure?

The child or their parents or representative should submit evidence of the child’s family’s financial situation for the past **6 months**.¹ If this is not possible, they should explain why not. This evidence should include:

Assets:

¹ See [Applications for a citizenship fee waiver for individuals under the age of 18 \(publishing.service.gov.uk\)](#), pages 20 -21.

Bank statements for most recent 6 months for all bank accounts and building society accounts held by people who are responsible for the child (usually parents, but sometimes other family members or guardians, etc). Also, documents relating to any investments. Assets may be in various forms, including:

- cash
- money in bank and building society accounts (including non-UK based accounts), including accounts belonging to the parents or children (as well as any other adult with whom the applicant and parent(s) live and from whom they receive financial support)
- investments, including any investments belonging to the parents or child (as well as any other adult with whom the applicant and parent(s) live and from whom they receive financial support)
- land or property, particularly any property they don't live in
- goods held for the purpose of a trade or other business

Income:

- Employment income: Pay-slips, contract of employment, P45s and P60s, and/or a letter from the employer
- Welfare benefits income: Letters from DWP, printouts of monthly payments on gov.uk online account
- Section 17 support: where a family receives Section 17 support from a Local Authority, it's helpful to get a letter from the Local authority explaining how much money they provide each month and whether they provide accommodation or any other support.
- Financial support from friends and family (letters, IOUs, bank statements, messages, etc)

Expenses:

Evidence could be in the form of bank statements, mortgage records, tenancy agreement, utility bills, receipts for payments of food, clothing, and other essentials, etc.

Example – limited financial records

Col is a 17 year-old child who is entitled to British citizenship as he was born in the UK, is and always has been stateless, and lived in the UK for the past 5 years. Col has no right to live or acquire citizenship in any other country. Col's mum died several years ago. His dad, Bo, has recently been granted limited leave to remain in the UK as a stateless person, but Col was not included in Bo's application and has no immigration status. Bo has been receiving Universal Credit and other benefits for 3 months. He is currently not able to work due to long covid and depression. Previously, Bo and Col were destitute and homeless for several months. They have no savings or assets. Col is eligible for a fee waiver for his citizenship application.

For Col's fee waiver application, they could submit records showing receipt of benefits for 3 months and write a letter or statement saying that they were homeless before that and have no other financial records. If possible, it would help if they could also ask the homeless shelter where they stayed sometimes for a letter to confirm that they were homeless, and for how long, and send that in with Col's fee waiver application. If Col has ever been assessed by a local authority as a 'child in need', it may help to include documents relating to that assessment and any support provided. It might also help if Col's school or any other professionals who have knowledge of his situation could write letters to confirm this.

[*hypothetical but realistic example]

Is it better to submit an online application or an application in the post?

It is possible for most applicants to apply for a fee waiver and for citizenship online or by post. However, applicants applying from Guernsey or Jersey must apply by post.

Online fee waiver applications have some advantages. Online applications do not require as many *original* documents as postal applications. The Post Office and the Home Office sometimes lose things, so it is best to submit original documents only if necessary (and applicants should always keep copies of important documents).

If submitting the fee waiver application online, the applicant can submit the **citizenship** application only **after** getting a decision about the fee waiver application. If the fee waiver is granted after an online application, they **must** also apply for citizenship **online**. This 2-step process can make things a bit easier, especially if the applicant needs to gather more evidence for their citizenship application.

If submitting by post, the applicant must submit the fee waiver, the citizenship application, and supporting evidence together.

Online applications	Postal applications
Cannot be used by those applying from Guernsey or Jersey.	Must be used when applying from Guernsey or Jersey.
If using an online fee waiver, the applicant must also apply to register as British using the online form	Fee waiver application form, citizenship application form and all supporting documents to be posted together.
The fee waiver application is submitted first. Once the fee waiver application is approved, the applicant must submit their online citizenship application within 28 days.	Original documents must be posted to the Home Office.
The applicant can keep original documents but will need to provide them to the Home Office if requested.	Keep copies of all original documents
Keep records of the online application a copy of all documents submitted in a safe place.	Use registered delivery when applying by post. Keep the receipt and a copy of all documents submitted in a safe place.

What will happen after the fee waiver has been submitted?

The Home Office will usually consider the application and send a decision on the fee waiver application promptly. The Home Office sometimes asks for further information about a fee waiver application, and the applicant must respond to any queries within **14 days**. If an online fee waiver application is approved, the Home Office will provide a ‘code’ [called a token] which will need to be added into the citizenship application form when it is sent. After receiving the code, the citizenship application must be submitted within **28 days**.

What if a child turns 18 after applying for a fee waiver online but before submitting the citizenship application?

Some routes to British citizenship are only available to children if they apply before their 18th birthday. The citizenship fee waiver is also only available to children if they apply before their 18th birthday. If a child turns 18 after submitting a fee waiver application online, if the fee waiver is *approved*, the citizenship application must be submitted within **28 days** of the fee waiver’s approval.

If an **online** fee waiver application is refused, the applicant should be treated as having submitted the citizenship application before their 18th birthday **only if** they submit a valid citizenship application and pay the fee within **10 working days** of the date on which the fee waiver refusal is sent to them.

If a child has applied by **post** before their 18th birthday, and the fee waiver is refused, and the child has in the meantime turned 18, they must pay the citizenship application fee within **10 working days** of the date on which the fee waiver refusal is sent to them.

Most people granted British citizenship after their 18th birthday must pay a fee of £80 for a citizenship ceremony. But if the applicant turns 18 after their application was submitted and a fee waiver has been granted, they do not have to pay the application fee or the citizenship ceremony fee.²

Failure to meet Home Office deadlines may result in an application being treated as invalid and having to start over.

Time frames for application process	
If Home Office asks for further information about a fee waiver application, the applicant must respond to any queries...	within 14 calendar days (the guidance is not entirely clear, but to be safe, treat this as within 14 days of the date of the query). More time can be requested in exceptional circumstances.
If an online fee waiver application is approved, the citizenship application must be submitted...	within 28 calendar days of the date of the decision.
If the applicant submitted fee waiver and citizenship applications on paper and the fee waiver application is refused, they must pay the fee...	within 10 working days of the refusal being communicated to the applicant. If this deadline is missed, the citizenship application will be treated as invalid. [* 10 working days means only Mon, Tues, Weds, Thurs and Fri are counted].
If an online fee waiver application is refused, to proceed with a citizenship application, the applicant may submit a valid citizenship application and pay the fee...	within 14 calendar days (the guidance is not clear, but to be safe, treat this as within 14 calendar days from the date of the decision), or they can make a new application for a fee waiver.

² See p 23 of this Home Office [guidance](#).

	If the applicant turned 18 after applying for a fee waiver, see below.
If an online fee waiver application is refused, an applicant who has turned 18 after applying should be treated as having submitted the citizenship application before their 18 th birthday if they submit a valid citizenship application and pay the fee...	within 10 working days of the date on which the fee waiver refusal is communicated to them. [*10 working days means only Mon, Tues, Weds, Thurs and Fri are counted].
Applicants must attend a biometrics appointment to have photos and fingerprints taken after sending in the citizenship application...	within 45 calendar days of the date the citizenship application was submitted.

Example - turning 18 during the application process

By age 17, Maria was eligible for British citizenship under the ‘[discretionary route](#)’. She was not born in the UK but had lived here since she was 6 years old. She needed to apply to register as a British citizen before her 18th birthday, or this route to citizenship would be cut off forever. As she approached age 18, Maria’s mum had leave to remain and Maria had applied for leave to remain but was waiting for the Home Office’s decision.

Maria’s citizenship application would have cost **£1,294** (£1,214 for the citizenship application plus £80 for a citizenship ceremony if Maria turned 18 before she was registered as a citizen). If the fee for the citizenship application is waived, the fee for the ceremony is also waived.

Maria’s family couldn’t afford to pay for her citizenship application. After covering essential costs, they had about £50-100 left each month.

Maria’s online **fee waiver** application needed to be submitted before her 18th birthday. Even if she would turn 18 before the **citizenship application** was submitted, the Home Office must treat her **citizenship application** as “received” on the date that her online fee waiver application was submitted. Maria could also have submitted her **citizenship application** and **fee waiver application** together by **post**, before she turned 18, if all the documents she needed for both applications were ready).

[*hypothetical but realistic example]

Fee Waiver Decision-Making Timeframes

The Home Office Guidance states that decision makers should consider evidence, ‘promptly’. In KIND UK’s experience, the Home Office typically takes 4-5 weeks to make a Fee Waiver decision, but it could be longer or shorter.

What to do if a fee waiver is granted, but the code doesn't work when put into the online application for citizenship registration?

The online system can be a bit tricky. If a fee waiver is granted, the Home Office issue a 'token' (or code) that must be entered into the online application when applying for citizenship. If the token doesn't work, check if all names (and other details) on the citizenship application are **exactly** the same as the information on the fee waiver. For example, names must be spelled exactly the same way ('Marianne' cannot be changed 'Marieanne'); titles must be exactly the same ('Miss' should not be changed to 'Ms'); and there should be no extra spaces or any other changes. If, for example, a name is written 'Abdi-Salam' on the fee waiver application, but on the citizenship application is written with extra spaces as 'Abdi – Salam' or with an extra space at the end of the name as 'Abdi-Salam' or with no hyphen as 'Abdisalam', this may result in an error code.

If all details are identical and the code still doesn't work, the Home Office technical support service may be able to help: ApplyOnlineE-Support@homeoffice.gov.uk.

Biometric enrolment

After submitting a citizenship application, the Home Office requires applicants to attend a 'biometrics' appointment within 45 calendar days, where their fingerprints and photo will be taken. There are free or fee-paying appointments. Sometimes it can be hard to find a free appointment – keep trying!

Case Study: Aaron

Aaron was born in the UK in 2019. He and both his parents are Eritrean nationals. When Aaron was referred to KIND UK in November 2022, his father had been granted indefinite leave to remain in the UK after having had refugee status for 5 years, and his mother had applied for asylum but not received a decision. Aaron was entitled to register as a British because his father was now 'settled' in the UK.

KIND UK assisted Aaron through our clinic at Birmingham City University. The students working on his case looked at the family's financial situation and concluded that Aaron was eligible for a fee waiver due to his family's financial situation. They submitted a fee waiver application in March 2023, which was granted in June 2023. The application for registration as a British citizen was submitted a short time later. It was initially difficult to register for a free biometric appointment, but the students assisting Aaron tried several times and were eventually able to book one. Aaron was registered as a British citizen in September 2023.

Case study provided by Sagar Shah, KIND UK, Supervisor at Birmingham City University Clinic

How likely is the Home Office to approve a fee waiver application?

If the applicant is **eligible** and the **necessary evidence** is submitted, the Home Office will very likely approve the fee waiver. **Almost all** citizenship fee waiver applications submitted by KIND UK have been approved (approximately **95-98% success rate**).

What are the options if the fee waiver application is rejected?

There is no right to appeal or request reconsideration of a fee waiver application if it is rejected. The main options are to submit a new fee waiver application with better evidence or to pay the fee.

Some families may be eligible for an interest-free loan through [EdAid's Citizen Payment Plan](#) but they must be referred by an EdAid partner (KIND UK or Just for Kids Law).

If a fee waiver application is refused, it is important to consider whether it was because the applicant was **not eligible** for a fee waiver or because they **did not send all the necessary documents**. If the problem was a lack of documents, it may be worth applying again with more documents.

If a fee waiver application was refused unreasonably even though the applicant cannot afford the fee and sent all the necessary documents, in some (limited) circumstances, it might be possible to ask a judge to decide whether the refusal was lawful, through a process called judicial review. Specialist legal advice will be needed for this.

Jenny: child with health conditions refused a fee waiver

Most of KIND UK's fee waiver applications have been granted; but a few have been refused.

Jenny was born in the UK in 2020. She is a German citizen and had indefinite leave to remain in the UK when referred to KIND UK. Jenny lives with her mother, Jolie, a Sierra Leonean citizen who holds EU Pre-settled Status in the UK. Jenny's father is a German citizen and holds indefinite leave to remain in the UK. He is not involved in her life, but Jenny is entitled to British citizenship because she has a parent who is settled in the UK.

KIND UK began assisting Jenny with an application for British citizenship through our Birmingham City University Clinic in August 2023. Jolie inquired about a fee waiver for Jenny's application. We advised that it was not clear whether she was eligible for a fee waiver, because Jolie was able to save approximately £1,500 each month. She was saving up for a special bed and other resources for Jenny as she suffers from numerous health issues, including developmental delay, hypermobility, snoring, and other conditions. When submitting the fee waiver application, KIND UK argued that Jolie's savings should not be considered as available assets for Jenny's citizenship application because they were being saved for essential needs. However, the Home Office refused the fee waiver application.

Jolie decided to pay for Jenny's citizenship application through an interest free loan from EdAid, which KIND UK helped arrange. Jenny's citizenship application was submitted in November 2023. There were some complications with the application form because Jolie has very little information about Jenny's father, but these issues were resolved. Jenny and Jolie attended their biometric enrollment appointments in December 2023.

At the time this guide was prepared, Jenny was waiting for a decision from the Home Office about her citizenship application, which should be granted as she has a statutory entitlement to British citizenship.

Case study provided by Sagar Shah, KIND UK Supervisor, Birmingham City University Clinic



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Annexes

How KIND UK works when a potential client needs a fee waiver

Potential KIND UK clients who indicate they cannot afford to pay the Home Office fee for a child’s citizenship application are asked to provide details of the family’s financial situation (income, outgoings, savings, debts, etc) in an Income & Expenditure table like the one below. Our intake team then share this with the lawyers who will consider the application. We also ask potential clients to provide copies of their bank statements for the past 6 months.

Fee Waiver Income & Expenditure Table

For eligible clients, we can assist with a fee waiver application so they will not have to pay the Home Office fee of £1,214 per child for registration as a British citizen.

*The Home Office applies an **affordability test** to assess whether the applicant and parent(s) have credibly demonstrated that they cannot afford the fee. This applies when the applicant and parent(s) do not have sufficient funds at their disposal, after meeting their **essential living needs**, to pay the fee.*

*Please provide details of your **monthly income and expenditure**, your **personal savings and loans and mortgages** in the attached table.*

*We will need to provide the Home Office with copies of **6 months bank statements** for all bank accounts of all members of the household, including children. We will also have to provide documentary evidence of income and expenditure.*

*Note: the Home Office will require **bank statements for all accounts** (both current, savings and/or investment) held by **all individuals** living within your household. This includes details of all inactive accounts. It is also worth telling us about any recently closed bank accounts. The Home Office will also do checks with credit agencies to obtain details of all bank accounts held at your home address.*

Please include details of:

- 1) Inactive / dormant bank accounts*
- 2) All bank accounts held in children’s names*
- 3) Any bank accounts closed in the last 6 months*
- 4) Overseas bank accounts – any banks transfers to these accounts will be seen in your bank statements*
- 5) Anyone who has left your home in the last 6 months – eg estranged partners, deceased person, family member bearing the same family name who may have left, etc*

Please add details of any monthly/fortnightly/weekly income +expenditure in the spaces below. You can add additional lines if needed.

MONTHLY INCOME & EXPENDITURE

<i>Income</i>	<i>£ per month</i>	<i>How paid: cash/direct debit/other</i>	<i>Expenses</i>	<i>£ per month</i>	<i>How paid: cash/direct debit/online/ pay as you go top up</i>
<i>Salary 1</i>			<i>Rent</i>		
<i>Salary 2</i>			<i>Council Tax</i>		
<i>Self Employment income</i>					
<i>Child Benefit</i>			<i>Travel costs</i>		
<i>Other Benefit</i>			<i>Gas</i>		
<i>Other Benefit</i>			<i>TV license</i>		
<i>Universal Credit</i>			<i>Electric</i>		
<i>Help from family/friend</i>			<i>Water</i>		
<i>Local authority funding</i>			<i>Mobile</i>		
<i>Child Support (eg CMS/other parent)</i>			<i>Broadband</i>		
			<i>TV license</i>		
			<i>Loan repayment 1</i>		
			<i>Loan repayment 2</i>		
			<i>Food</i>		
			<i>Clothes</i>		
			<i>Insurance (car, home)</i>		
			<i>Insurance (other)</i>		
			<i>Membership fees</i>		
			<i>Children pocket money</i>		
			<i>Savings club payments</i>		
			<i>Charity donations</i>		
			<i>TV subscription</i>		
			<i>Private tuition</i>		
			<i>Gas</i>		
			<i>Electricity</i>		
			<i>Water</i>		
			<i>Car fuel/parking</i>		

Please add details of all banks accounts, including parent(s) and child(ren)

BANK / BUILDING SOCIETY TABLE			
<i>Bank</i>	<i>Account No</i>	<i>Account Name</i>	<i>Bank balance</i>

Please add details of all loans/mortgages

LOAN/MORTGAGE			
<i>Loan/mortgage company/friend name</i>	<i>Total amount Borrowed</i>	<i>Monthly repayment</i>	<i>Current balance owed</i>

INCOME, EXPENSES, LARGE INCOMES & LARGE OUTGOINGS

*Below are examples of different **income, expenses, large income + large outgoings** that you might or might not have – please include all which are relevant to your family.*

INCOME

Salary 1

Salary 2

Salary 3

Self employment – average monthly takings

Child Benefit

Universal Credit

Housing Benefit

Any disability benefit

Any grant money (from charity, local authority, community group, etc)

Child Support – from other parent

Child Support – from Child Maintenance Service (CMS)

Local Authority Support

Bursary/Student Loan

Charity Support

Regular gift income from friend/relative

Repayment of loan from friend/relative

EXPENSES

Rent/mortgage

Council Tax

Utility bills – water, gas, electricity, tv license,

Broadband bill

TV subscription (eg Sky, Virgin, Apple, Amazon, Netflix, etc)

Loan repayment

Debt repayment

Food

Clothes

Insurance – car/home/contents/household items/health

Charity donations

Education-related expenses

TV license

Travel costs

Car MOT

Car road tax

Car fuel/parking

Money loaned to friend or relative

Money sent overseas to family member – eg parent, sibling, child, etc

Membership fees (gym, yoga, swimming, etc)

Repayment of overpayment of benefit

LARGE INCOME

These will be seen in your bank statements and an explanation needs to be provided to the Home Office.

*Repayment of a loan to you
Insurance payout to you
Compensation /damages payment to you/family member
Any charity grant payment to you
Lump sum employment bonus
Redundancy payment
Bereavement payment
Backdated benefit payment*

LARGE EXPENSES

These will be seen in your bank statements and an explanation needs to be provided to the Home Office.

*Large essential items you recently purchased – eg furniture, washing machine, cooker, microwave, heater, car, bike, etc
Funeral costs
House repair – eg roof, wall, ceiling, water leak, etc
Replacement of essential item due to loss, theft, damage, or breakdown – eg car, bed, washing machine, cooker, tv, laptop, etc
Repayment of loan
Payment of older child's university fees/accommodation costs*

Evidencing the Application

The applicant must provide evidence to prove they qualify for a fee waiver. It is important to provide documents, where possible, to support any information provided about the family’s financial situation. If documents are not available or it is not clear what a payment relates to, then this should be explained in a statement. For example, it may be important to explain:

- Regular/irregular financial payments from a former partner
- Tokens for school meals
- Money sent to a family member overseas
- Cash payments for big items, repairs, groceries, etc

Below are a few examples of the types of evidence that may be used to show eligibility for a fee waiver.

Income/Expense	Primary Evidence	Primary Evidence	Useful secondary evidence	Useful secondary evidence
Salary	Payslips	bank statements		
Benefits	Letter	bank statements		
Universal Credit	Letter	Bank statements		
Child Support - CMS	Letter	Bank statements		
Child Support – ad hoc			Email from sender	Exchange of emails/texts/chats
Gift	Letter	bank statements	Email from sender	
Utilities: Gas, water, broadband, tv license,	Letter	bank statements	emails	Contract
Rent	Tenancy agreement	Bank statements	Email letter from landlord	
Money sent overseas	receipt	Bank statements	Email from money transfer company	Could be online account
School meal token	Letter	Bank statements	Token sent by Text with code	
Loan to parent	Letter from loan provider	Bank statements	Email from loan provider, with photo ID	Parent Witness statement
Receipt of repayment of loan	Letter from debtor	Bank statements		Parent Witness statement
loan	Loan agreement letter	Bank statements		Parent Witness statement
Repayment of debt	Default letter	Bank statements		Parent Witness statement
Repayment of excess benefit received	Letter from DWP	Bank statements		Parent Witness statement

Tip: If you think you cannot get evidence to corroborate – think again. You can often find some kind of records, for example:

- Check an Amazon/Ebay/Store online account and download purchase receipts.
- Emails or screen shots of text messages about a purchase.
- Letter or email explaining a loan, payment or gift, with photo evidence if possible.

Justifying Expenditure

It may be necessary to explain the purpose of any expenditures or incoming payments in a statement, to show why they should be considered essential. For example:

- **Sending money overseas** – If family are refugees and overseas family are displaced, living in difficulty situation, are disabled, etc
- **Buying a computer** – if it is for the use of children for school work and further their education, or used by adult for work-related purposes, it can be considered an essential item
- **Charity donations** –may be considered essential, for example, if based on a tradition to make donations on a particular date in the religious calendar
- **Gifts for children** – explain that these are important to a child’s well-being, especially if, for example, they previously missed out on birthday and cultural/religious festival days when they would typically have received gifts or there are other reasons why the gift was important.

Excess Savings

Again, explain and make the case. Examples might be:

- **To fund a holiday for the children**, especially if they have not have one for 1-2 years due to lack of funds or other reason, so parent has been putting money to one side or has borrowed some. Explain if it is particularly important for the well-being of the children.
- **To fund essential repairs/replace essential household item**. Provide a quote and even photos of any disrepair and evidence of efforts to get the landlord or local authority to assist, or show you did overtime, or had to forsake a holiday to save up this money.
- **To fund necessary private/alternative health or dental treatment** not covered by the NHS; or an item of furniture or adaption to the home needed because of a disability.

Sample Parent Statement for Fee Waiver

THIS IS AN EXAMPLE OF A STATEMENT. ONLY INCLUDE PARTS THAT ARE RELEVANT – DELETE EVERYTHING ELSE.

**STATEMENT
OF PARENT NAME**

1. I, **PARENT'S NAME**, of **ADDRESS** SAY AS FOLLOWS:
2. I make this statement to explain the financial circumstances of myself and my child, **NAME**, as part of a Fee Waiver application on **his/her** behalf. My child intends to apply for British citizenship and requires a fee waiver in order to make the citizenship application.
3. The contents of this statement are true to the best of my knowledge and belief.

PERSONAL BACKGROUND

4. I was born in **country of birth** on **DATE** and am of **xxx** nationality. I moved to the UK in **YEAR** and my child **NAME** was born in the UK on **DATE**. Here include a summary of relating to the other parent (nationality, are they still together, does child have contact, etc).

FINANCES: SOURCES OF INCOME

5. I have various sources of income, as set out below: **[include only those which are relevant]**
6. **Universal Credit**- Since **DATE**, I have received a monthly payment of approximately **£AMOUNT**. This includes Standard Allowance (approximately **£AMOUNT**), Child Support for 2 children (**£AMOUNT**) and a Limited Work Capability payment (**£AMOUNT**).
7. **Housing Support**: I enclose a letter from the **XXXXXX** Council dated **DATE** which confirms that I am provided with a private tenancy for our current accommodation. The scheme is run to assist “vulnerable clients that are in priority need and homeless or in risk of homelessness with an assured short-hold private tenancy”. I also receive additional Housing Support of approximately **£AMOUNT** for my rent per month. The Council directly pays the housing element of my Universal Credit payment to my landlord through the Homefinder Scheme. My rent is **£AMOUNT** a month, of which **£AMOUNT** a month is paid directly to the landlord. I am responsible for paying the balance of **£AMOUNT** directly to my landlord, which I meet from the other financial support schemes.
8. **Personal Independence Payment**: As a result of a long term disability, I have received Personal Independence Payments since early **YEAR**. These currently total approximately **£AMOUNT** a month. I enclose my Certificate of Entitlement to Personal Independent Payment (Serial Number: **xxx**) which confirms that I am receiving Enhanced Rate Mobility component of Personal Independence Payment since **DATE**.
9. **Child Benefit**: I receive Child Benefit of **£AMOUNT** a month.

10. *Borrowing money from family and friends:* *Aside from the above payments, as I am unable to work, I do not receive any additional income. As there are usually many delays with getting my various support benefits and the mounting costs of supporting myself and two growing children (including NAMES), I often need to borrow money from friends and family on a short-term informal basis. I try to pay this back as soon as I can. As a result, my bank accounts often show money coming in from [NAMES], and being paid back to them over time. I attach screenshots of messages from both of these people confirming the nature of the relationship.*
11. *Some payments show up as payments to and from xx (my husband) who is also known as NICKNAME.*
12. *In terms of other income, I note that on DATE, I received a payment of £1234 from xxx - this relates to compensation from a car accident and was a one-off payment. No further payments are due in relation to this accident.*
13. *CHILD attends college but also works part-time to bring in extra income to help with her day-to-day expenses. She currently has two part-time jobs. CHILD works at ... XXXXX in XXXXX. She has worked there since April 2022 and usually takes home about £100 a month after tax. She also works at ... XXXX XXXXXXXX in XXX, and has worked there since 1 September 2023. She usually makes about £200 a month net from this job. Most of her income is used on college expenses and some of her own day-to-day expenses such as travel, food etc. These expenses are supplemented by myself almost on a daily basis.*

BANK ACCOUNTS

14. *I have 3 bank accounts, held with Lloyds, Monzo, and Barclays.*
15. *I have provided details for account XXXX, XXXX and XXXX. Of these, Account A is my primary account as my Universal Credit and PIP payments are made to this account. The other accounts are Savings Accounts which I opened with the hope of saving money for my children, and are not used on a regular basis. As can be seen from the Savings Accounts, most of the balances are either nil or have minimal funds in them.*
16. *I have a Monzo Account with Account Number xxxx. My Child Benefit is paid into my Monzo Account. I usually transfer money from my Lloyds account to my Monzo account (once my Universal Credit and PIP have been received), which I then use for day to day living expenses. As you can see from the bank statements, Monzo accounts have a designated "Pot". This lets me separate money within my normal account like a segregated "Savings" account. Money can be moved in and out of the "Pot".*
17. *I also have a credit card with Lloyds with Account Number xxxx. This card has a credit limit of £500 and I have to make a minimum repayment of approximately £100 per month.*
18. *I enclose copies of bank statements for each of the above accounts for the previous 6 months. I also enclose bank statements for my Lloyds and Monzo accounts for the last 12 months to demonstrate the payment of my Universal Credit, PIP and Child Benefit support payments.*

MONTHLY OUTGOING PAYMENTS

19. I am responsible for the monthly outgoings for me and my children.
20. Over the last year, there have been a number of events/circumstances which mean that there have been a significant number of large outgoing costs. For example, due to my mobility issues I have to get a large number of taxis to travel around, including to take my youngest child to school, and these are expensive. As a household, we spend approximately £400 a month on travel.
21. We have also moved x times in the last 12 months, including 2 months in emergency temporary accommodation. This is extremely disruptive and we have had to pay a lot of money to moving companies each time. For example, xxxxx. These payments can be seen on my Monzo bank statements.
22. During the time we were at the Travelodge in temporary accommodation, we had no access to a kitchen or any cooking facilities. We had to spend a lot of money on takeaways in order to eat. This can be seen on my bank statements with a large amount of takeaways and Deliveroo or Uber Eats orders.
23. Support for family members- My father has cancer and is now in a care home in XXXX. In our culture, it is the duty of the children to look after the wellbeing of their parents. Despite having no discretionary savings, I try to help and send money to my father for the care home costs when I can.- This is usually at least £300 a month. My sister recently passed away on DATE and I also had to fund her funeral costs. On my bank statements, these payments are seen as references to Western Union.
24. Bills- Gas/Electricity- my husband used to previously pay these utilities bills but we are now separated, though the account is still in his name. We moved into our current property recently and the bill for December 2023 is for £AMOUNT for gas and electricity alone.
25. Now that we are settled in our new accommodation, we expect regular outgoings to be as follows:
- Rent - £300 a month (my direct contribution)
 - Travel - approximately £400 a month
 - Gas and electric - £117 a month
 - Food - £800 a month
 - Clothing - £100 a month
 - Mobile Phone - I pay for 3 mobile phone tariffs, approximately £84 a month
 - TV Subscriptions / Licence - £15 a month
 - Care home costs for my father - £300 a month
26. At the end of each month, my bank balances tend to be xxx and I have little or no money left over. We therefore do not have the money to be able to afford the citizenship application fee and are accordingly making this fee waiver application.



27. *I can confirm that this statement is true and correct to the best of my knowledge and belief.*

Signed:

Date: