



Joint Response to the *Freedom from violence and abuse: a cross-government strategy*

By Hibiscus, Latin American Women's Aid (LAWA), Safety 4 Sisters Northwest and Rights of Women

We are a group of frontline women's organisations supporting Black and minoritised migrant victim-survivors of violence against women and girls (VAWG). In this response, we underline our concerns regarding the government's *Freedom from Violence and Abuse: a cross-government strategy to build a safer society for women and girls* (the VAWG strategy) published in December 2025, highlight gaps in consideration, and provisions that will harm women with insecure immigration status. We draw attention to the limited consideration given to migrant and asylum-seeking women, particularly those subjected to the No Recourse to Public Funds (NRPF) condition, as well as the impact on *by and for* services supporting them. We have focused our analysis on our respective areas of expertise and use our collective voice to reinforce concerns raised across the sector.¹

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Wider context and political environment

In the UK and globally, VAWG remains an urgent and pervasive issue affecting women and girls. The National Policing Statement for VAWG states that 1 in every 12 women in the UK will experience VAWG each year.² From our own frontline work and understanding of the additional barriers to disclosure faced by Black and minoritised migrant women, we believe the figure to be significantly higher for this group. However, the impact of VAWG varies across different populations. Women who are subjected to additional marginalisation are at heightened risk of abuse due to the intersectional discrimination they experience and the influence of systems of oppression, while being excluded from access to safety, justice and support. Systemic racism puts women at greater risk of economic deprivation, at higher risk of mental health problems and creates barriers to

¹ Several organisations from the sector have shared their initial and in-depth responses to the strategy. For example: Women's Aid <https://womensaid.org.uk/womens-aid-responds-to-governments-violence-against-women-and-girls-strategy/>, Imkaan <https://www.imkaan.org.uk/government-vawg-strategy-analysis>, Agenda Alliance <https://www.agendaalliance.org/news/agenda-alliance-responds-to-the-violence-against-women-and-girls-strategy/> amongst others.

² <https://cdn.prgloo.com/media/5fc31202dd7e411ba40d29fdca7836fd.pdf>

accessing support. Perpetrators exploit these vulnerabilities to further isolate and harm. This is the case for migrant women who continue to experience high levels of interpersonal and state violence exacerbated by the expansion of hostile immigration policies and far-right rhetoric, as well as the institutional racism embedded within the police and wider Criminal Justice System (CJS).

In this sense, VAWG and the VAWG strategy cannot be considered in isolation: it must be considered in its wider sociopolitical context so that its true impact on Black and minoritised migrant women can be seen. Recent announcements such as the changes to the asylum system, the proposed 'earned settlement' policy and the publication of the 2025 Immigration White paper are likely to override the very limited provisions for migrant victim-survivors proposed in the strategy and its Action Plan.³ Under new reforms, refugee status will be reviewed every 30 months replacing the previous system that granted five years of leave to remain before eligibility for settlement. Women who have experienced VAWG require long-term support and stability to recover and rebuild their lives. This is in direct contradiction with recent and proposed changes to immigration and asylum policy. The minimal consideration given to these groups of women is not enough to counteract the significant disproportional impact that will be, and is already being, caused by the erosion of their rights as migrant and asylum-seeking women. There is no doubt that they will be left at greater risk of VAWG, and with less access to support because of this.

Nationally and internationally, VAWG is, rightly, recognised as human rights violations. Instances of VAWG breach women's rights not to be tortured or treated in an inhuman and degrading way, to respect their private and family life (including the right to physical and psychological integrity), not to be discriminated against on the basis of sex, and, in too many cases, their right to life. Therefore, it is disappointing that the strategy lacks a human rights framework to eradicate violence, including core principles such as having a women-centred approach, due diligence and an intersectional perspective. In this vein, the importance of ratifying international human rights treaties and conventions should become a key principle to bolster protections for all women. Unfortunately, the strategy fails to uphold Labour's previous commitments to ratify the Istanbul Convention without reservations, to ensure migrant women are not discriminated against.⁴

In addition to the direct impact on victim-survivors of VAWG, we are concerned about the restricted opportunities the VAWG sector had to inform the development of the strategy, particularly the frontline *by and for* organisations that work directly with the women who often feel the harshest impacts of VAWG. This likely contributed to the lack of consideration of intersectionality and the additional marginalisation experienced by Black and minoritised migrant women. If the same dynamic continues as the strategy is delivered, it risks leaving no opportunity for accountability and learning, further magnifying existing problems and, ultimately, undermining the trust of the women it was intended to protect.

The Strategy Advisory Board will, according to the strategy, have a role in overseeing its implementation and action plan. However, in practice the establishment of the Board and meetings have been characterised by a restrictive and opaque nature, lack of

³ <https://hibiscusinitiatives.org.uk/blog/statement-in-response-to-the-governements-immigration-white-paper/>

⁴ <https://icchange.co.uk/call-for-ratification/>

information sharing and non-existent opportunities for organisations that are not part of the Board to raise concerns. Along with 30 other organisations, we wrote to the Safeguarding Minister at the Home Office and the Victims' Minister at the Ministry of Justice urging them to ensure the implementation creates avenues for different voices and expertise to be central to the work. We recently receive response to the letter, however, the response does not provide a clear plan for an inclusive engagement.

Prevention

We welcome the focus on prevention throughout the strategy. However, although this pillar in the strategy positions itself as part of a whole-of-society effort aimed at tackling the root causes of violence, this ambition is fundamentally compromised by the strategy's failure to recognise the specific experiences and systemic barriers faced by migrant, Black and minoritised victim-survivors. By overlooking these realities, the strategy defaults to a universalised framing that assumes prevention can be delivered through a single model applicable to all victim-survivors. This perspective ignores the ways in which immigration status, racialisation, racialised misogyny, communication barriers, cultural dynamics and systemic racism shape both the risks women and children face and the obstacles they encounter when seeking support.

Furthermore, we reject the implication that prevention can be conflated with early intervention alone. Prevention requires structural safety, social protection, and the dismantling of the inequalities that create the conditions for violence in the first place. Migrant women cannot meaningfully access preventative support when their immigration status is insecure, when NRPF conditions deny them financial stability, when they cannot safely report abuse due to fear of immigration repercussions, or when specialist *by and for* services lack the sustained funding required to meet their needs. Prevention depends on first ensuring women's basic needs are met, including access to stable housing, welfare, legal protections, healthcare and mental-health support. Yet current immigration and welfare policies systematically restrict these avenues, leaving marginalised women vulnerable and so at heightened risk of VAWG, making the strategy's prevention promises unattainable for those who need them most.

Lack of acknowledgement of cultural dynamics of abuse

A central issue in the strategy's consideration of prevention is its complete silence on the cultural, racialised and migration-specific dynamics that shape how abuse is perpetrated and experienced. Although the strategy speaks broadly about "breaking intergenerational cycles of abuse", it treats these cycles as uniform and isolated, overlooking how violence is rooted in social norms, cultural expectations and community structures that differ widely across communities. Prevention work cannot be the same for everyone; therefore, any model that fails to recognise these specificities is made to leave behind the women and children who face the greatest structural barriers to safety.

In addition, the strategy does not acknowledge the profound communication barriers many migrant women face, including limited English proficiency and limited translated resources, lack of awareness of available services, and exclusion from mainstream

provision. These obstacles are rooted in and compounded by systemic racism within statutory agencies, where Black and minoritised migrant victim-survivors frequently encounter disbelief, dismissal or even criminalisation when they seek help. When prevention efforts fail to address racism in its interpersonal, institutional and systemic forms, they cannot begin to dismantle the conditions that allow violence to persist.

Relationships, Sex, and Health Education (RSHE) accessibility and meaningful youth involvement

We welcome the strategy's commitment to continuing the implementation of the RSHE curriculum. However, for RSHE to be an effective prevention tool, it must address the inequalities that affect young people's experiences at school. As EVAW has highlighted⁵, the RSHE curriculum must cover issues faced by those experiencing multiple forms of harm, including racialised sexual harassment and disproportionate disciplinary responses, which particularly affect Black children and young people. Without an intersectional approach, the curriculum risks perpetuating the very inequalities it is intended to address. Likewise, schools are already overstretched and, unless they receive substantial investment and support, will be unable to deliver the RSHE curriculum in a way that responds to the lived experiences of diverse student groups.

Effective implementation also depends on cultural and linguistic accessibility. The strategy pledges that every child will access support but makes no specific provisions to address structural barriers. Many migrant and EAL learners may not engage fully with RSHE unless lessons are adapted to their languages, contexts and cultural experiences. These needs cannot be met through generic delivery. When the strategy proposes the involvement of external providers in healthy-relationships education, it is essential that specialist *by and for* organisations are included. Their knowledge of the community, cultural competence and trusted relationships with marginalised communities are crucial for making RSHE relevant, credible and genuinely preventative. Without their involvement, RSHE will continue to overlook the specific experiences of young people from migrant, Black and minoritised communities.

Finally, RSHE will only achieve its preventative potential if young people are active participants in shaping how it is delivered. Yet the strategy continues to position them mainly as passive recipients. Young people need structured opportunities to influence its delivery, identify emerging risks in their peer environments, and feedback on what is working. Without intentional youth participation, RSHE risks being disconnected from the lived realities of the people it aims to protect.

Over reliance on criminalisation in tackling online VAWG

The strategy's approach to online VAWG is constrained by an overreliance on criminalisation. While identifying online abuse as an "unprecedented challenge", it focuses primarily on new offences and punitive measures, leaving unaddressed the broader structural and systemic forces that enable online harm. Criminal justice responses do not alter platform architecture, algorithmic bias, engagement-driven profit

⁵ https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/2024/07/RSHE-Consultation_VAWG-Briefing.pdf

models or design features that permit perpetrators to circumvent accountability. Furthermore, they do not alter the entrenched misogyny that lead people to carry out this abuse.

Effective prevention requires upstream structural regulation, not just downstream enforcement. Yet the strategy stops short of making Ofcom's VAWG guidance mandatory, despite longstanding evidence that voluntary compliance from tech companies is inadequate. It also fails to explain how it will tackle image-based sexual abuse in practice, offering no detail on how rapid takedown will be ensured, how re-uploads will be prevented, how reporting pathways will be improved or how survivors will be supported. The omission is particularly troubling given that migrant, Black and minoritised women experience distinct and highly targeted online abuse⁶, including racist misogyny and immigration-related harassment. Young migrant women experience misogynistic harassment shaped by the intersection of racism and immigration status, yet these experiences are frequently normalised.⁷ This is compounded by broken or ineffective reporting mechanisms that are targeted to individual accounts rather than community impact. As a result, Black and minoritised migrant women many do not report incidents.

Those of us working within specialist and *by and for* organisations know that prevention cannot be achieved through narrow interpretations centred on early intervention or generic, universal frameworks that overlook the structural realities shaping women's lives. It is only by addressing misogyny and racism in all its forms, housing inequality, NRPF restrictions, financial precarity, mental-health barriers, communication obstacles, exclusion from services, and systemic racism within statutory institutions that VAWG can genuinely begin to be prevented.

Perpetrator Management

We welcome the recognition that Black, minoritised, migrant and asylum-seeking victim-survivors are more likely to experience criminalisation, as well as the acknowledgement that the fear of disbelief and criminalisation is used as a tool for abuse. However, many of the measures proposed for the “relentless pursuit of perpetrators”, such as increasing surveillance and the use of technology-led tools, will likely cause further harm to women subjected to marginalisation.

The recommendation that the police will be empowered to use extreme, anti-terrorism style law enforcement approaches against suspected perpetrators of VAWG is highly concerning. Consistent evidence shows that anti-terrorism and anti-radicalisation programmes disproportionately single out Black and minoritised people⁸, which risks increasing levels of criminalisation and imposing additional barriers that will prevent victim-survivors from these communities from coming seeking help.

The strategy also introduces the use of data and intelligence-led tools, including facial recognition. As recently admitted by the Home Office, facial recognition is more likely to misidentify Black and Asian people, a fundamental bias that particularly harms Black

⁶ <https://survivorsnetwork.org.uk/understanding-digital-misogynoir/#:~:text=What%20is%20digital%20misogynoir?,the%20angry%20Black%20woman>

⁷ YWAB (2025). *Voices of Young Latinas: Peer Research on online abuse and the impact of fetichisation*. London: LAWS. Available at: <https://tinyurl.com/2d4mec6m>

⁸ <https://www.amnesty.org.uk/latest/uk-un-recognises-human-rights-violations-controversial-prevent-strategy-0/>

women.⁹ In this context, the potential damage of the use of these approaches cannot be underestimated, particularly given the wealth of evidence demonstrating rampant institutional racism within the police¹⁰ and police perpetrated domestic abuse.¹¹ This does not appear to have been considered within the strategy, despite its potentially devastating consequences.

We strongly oppose these proposals as we believe they will not make women safer: they will instead divert attention from the root causes of abuse and the urgent need for sustainable, long-term funding for specialist organisations by advancing a securitising agenda, rather than one focused on prevention, education, and tailored support for women who are victim-survivors of VAWG.

Criminalisation

As acknowledged by the MoJ, the vast majority of women in the CJS are victim-survivors of multiple forms of VAWG, including domestic abuse and modern slavery. As explained above, for Black and minoritised migrant women, more vulnerable to the root causes of abuse and exploitation, less able to access support, and with additional barriers to disclosure, we believe the numbers to be particularly high. Despite this, the strategy makes no mention of victim-survivors subject to the CJS except for the acknowledgement that the numbers are estimated to be far higher than for the general population and the limited understanding and awareness of the dynamics of abuse that lead women to offend. This acknowledgement must be met with further scrutiny of how these women are currently being failed, and the actions needed. The existence of this problem is evidence: by not addressing it, the strategy allows further harm.

Criminalised migrant women are now also at risk of accelerated removals. The government has recently implemented changes to policy to deport “foreign national offenders” immediately upon sentencing as well as to overhaul modern slavery protections. This will disproportionately harm criminalised migrant women who have experienced VAWG and exploitation by compounding existing vulnerabilities rather than addressing the root causes of their contact with the criminal justice system. The strategy’s omission of the intersection of the criminal justice system, immigration system and VAWG undermines its own goals and perpetuates a two-tier system that treats migrant women unfairly.

Incarceration of women

Despite the alarming evidence that nearly 70% of women in prison have experienced abuse, the strategy falls short of providing a framework to ensure that women in contact with the CJS are protected and kept safe. Worse still, there is no recognition that when criminalised, Black and minoritised victim-survivors enter the CJS that it causes further

⁹ <https://www.theguardian.com/technology/2025/dec/05/home-office-facial-recognition-tech-issue-black-asian-subjects>; <https://libertyinvestigates.org.uk/articles/police-forces-biased-facial-recognition-technology/>; <https://www.theguardian.com/technology/2026/feb/25/facial-recognition-error-prompts-police-to-arrest-asian-man-for-burglary-100-miles-away>

¹⁰ <https://dpqlaw.co.uk/racial-discrimination-by-the-police-the-institutionalism-of-racism-in-uk-policing/>

¹¹ <https://www.centreforwomensjustice.org.uk/ppda>

harms, both through the systemic racism and misogyny known to be present within it, and through the specific harms of physical restraint and use of force, incarceration, and lack of access to necessary support.

Hibiscus' service users often report that prison exacerbates the trauma, physical and mental health problems caused by their previous abuse and exploitation, notwithstanding the fact that their convictions are invariably, unsurprisingly, linked to their experiences of VAWG. Despite this, specialist support is not available or properly funded in prisons, and access to mainstream support is inadequate, limited, often involving long waiting times. Our experience of providing support to women in prisons has demonstrated that significant barriers also exist for specialist and *by and for* organisations, including lack of available funding and barriers imposed by the prisons that create limitations for frontline staff (e.g. restricting access to service users, slow responses to requests, lack of privacy when discussing confidential issues, and the threat of revoking access if valid complaints are made). Despite the expertise to provide support existing, the women who need it cannot access it.

The strategy mentions the Women's Justice Board's objective to advise the Government on its commitment to reducing the number of women being sent to prison. However, despite the high expectations surrounding the Board, the reality is that their work was effectively paused for five months prior to the publication of the strategy, during which time no official meetings took place. Since the strategy's publication, the Board have published their report of recommendations for reducing women's imprisonment. It is our understanding that the work of the Board and accompanying Partnership Delivery Group has now ended. Simultaneously, engagement with frontline organisations has been scarce, particularly with *by and for* and specialist organisations working with women who experience additional and intersecting marginalisation.

Finally, a significant gap from the strategy is overlooking the negative impact of immigration detention on victim-survivors. The problems faced by Black and minoritised migrant women persist for those detained under immigration powers, exacerbated by the fear and violence of the immigration system and experience of indefinite detention. As for women in the CJS, their vulnerability and need for support is acute, however access to support, particularly specialist support, is extremely limited. The threat of deportation or release to destitution increases their vulnerability further, both whilst in the UK and if deported to another country. An agenda to accelerate deportations of migrant people with criminal convictions has progressed at speed, meaning that potential victim-survivors who are not recognised as such are at risk of further punishment and the threat of re-victimisation and transnational abuse.¹² Excluding these women from the strategy indicates a complete disregard for migrant women's experiences as victim-survivors of VAWG.

Counter allegations

Black and minoritised migrant women are often disbelieved by the police and immigration authorities. In contrast, they are frequently instead assumed to be perpetrators, or making up stories of violence to abuse the system. This is something that

¹² <https://hibiscusinitiatives.org.uk/news/hibiscus-reflections-on-the-sentencing-bill/>

those perpetuating VAWG are aware of. Recently, more organisations have identified how malicious counter-allegations of abuse are made against victim-survivors.¹³ Perpetrators make false allegations of abuse, shifting the accusation onto women who may then be arrested and brought before the courts. Counter-allegations are sustained by misogynistic and racist power imbalances, where, due to a limited understanding of the dynamics of VAWG, abusers are perceived as more credible victims.¹⁴

For migrant women, the situation is even more challenging, as structural barriers, such as the failure to provide interpreters, institutional racism, and discrimination, undermine their ability to present evidence and to be believed. Furthermore, the consequences of these types of allegations for victim-survivors with insecure immigration status, or status dependent of the person abusing them, extend to their ability to access independent immigration status and settlement in the country.¹⁵ In this context, it is alarming that the strategy does not address this increasingly problematic issue.

In addition, aspects of government policy and rhetoric have reinforced these dynamics. Public claims that migrant women exploit domestic violence provisions within the immigration system to regularise their status, including suggestions that some fabricate allegations of abuse risk institutionalising suspicion within decision-making processes. This has been reflected in the reluctance to extend the Migrant Victims of Domestic Abuse Concession (MVDAC) to enable all migrant women who are victim-survivors of VAWG to access a route to settled status, with resistance reportedly grounded in concerns that the system may be “taken advantage of”. Such an approach risks embedding a presumption of misuse into policy design, likely leading to heightened evidentiary thresholds and credibility tests for migrant victim-survivors. In the context of counter-allegations, this policy environment may inadvertently enable perpetrators to weaponise immigration insecurity, while undermining fair, trauma-informed assessments of abuse.

Weaponisation of VAWG

In the last year, we have witnessed an intensification of the use of the ending VAWG agenda being weaponised by politicians, media and other stakeholders to fuel an anti-migrant rhetoric that fosters division and undermines efforts to safeguard victim-survivors. This includes those on the far-right claiming to be defending victim-survivors of VAWG (supposedly against “our women and girls”) to justify explicitly racist rhetoric, violence and intimidation, and those in the government using VAWG as justification for increasingly harsh immigration policy and racist anti-migrant rhetoric. There is a close link between both contexts, with government ministers having endorsed the far-right protesters as having “legitimate concerns”, further normalising and enabling the spread of racist narratives and outspoken racism.

Led by misinformation and disinformation¹⁶, this campaign is a racist distraction that reproduces racial stereotypes and prejudices, exacerbating racial and social inequalities to the detriment of women experiencing VAWG. Notably, sexual violence by

¹³ <https://www.centreforwomensjustice.org.uk/s/Doing-his-job-for-him-full-report-FINAL.pdf>

¹⁴ <https://www.advancecharity.org.uk/impact-of-counter-allegations-on-survivors-of-domestic-abuse/>

¹⁵ <https://www.rightsofwomen.org.uk/vawg-organisations-call-for-reform-in-ukvi-assessments/>

¹⁶ <https://www.newstatesman.com/politics/2025/08/the-problem-with-robert-jenricks-migrant-sex-crime-claims>

grooming gangs against girls has been reframed as a ‘foreign threat’, based on cherry-picked examples and ignoring key evidence. This both fails to prevent VAWG as it does not accurately target those who are perpetrating it or its root causes, and as it leaves Black and minoritised migrant women less safe as they are made additionally vulnerable by the anti-migrant policy and rhetoric. Considering the VAWG strategy’s inclusion of girls in the prevention and Child Sexual Abuse (CSA) provisions, there is no targeted approach outlining to how migrant girls, particularly those in families with NRPF and insecure immigration status, will access the support they very much need to recover. Despite being recognised as in urgent need of protection, in the absence of suitable safeguards against data-sharing with immigration enforcement and destitution, migrant girls remain structurally excluded from meaningful access to justice and recovery.

The strategy falls into this deeply troubling discourse by presenting deportation of “foreign national offenders” as a response to the VAWG crisis. This includes the proposals to move forward with policies that represent a threat to Human Rights protections, such as the “Deport Now, Appeal Later” scheme. Far from protecting victim-survivors, these policies make those most marginalised and most often failed by existing policies at increased risk, by placing them at increased risk of deportation.

Hibiscus has raised awareness of the damage that immediate deportation can have on victim-survivors with insecure immigration status that are wrongly criminalised.¹⁷ These include re-victimisation as the processes of immigration detention and deportation are inherently violent; limiting access to legal advice and representation; severing women’s connections to support networks and services leaving women’s emotional and practical needs unmet and heightened risk of experiencing transnational abuse and re-trafficking. As explained above, this vulnerability is often exploited by abusers who know that Black and minoritised migrant women may have no safe way to leave the situation they are in.

VAWG is perpetrated across different social, economic, cultural and ethnic groups. Nevertheless, it is vital to remember that it is universally rooted in patriarchal oppression, gender inequality and misogyny, as opposed to individual characteristics of those who abuse women. As such, an intersectional approach must be used to properly consider the specific impact that VAWG policy and strategy will have on those who face additional and compounding marginalisation based on their overlapping identities. If the ways in which the weaponisation of VAWG against Black and minoritised migrant women (directly or indirectly) are not considered, the policy does not include them.

Support

The strategy fails to comprehensively address the significance of barriers faced by Black and minoritised migrant women as a result of punitive immigration policy and legislation. Although it recognises how immigration status shapes the experience of abuse for migrant and asylum-seeking women it does not offer a set of meaningful and strategic actions to respond to migrant women needs.¹⁸ These should include extending existing

¹⁷ <https://hibiscusinitiatives.org.uk/blog/statement-on-government-plans-on-early-deportation-of-migrant-people-in-contact-with-the-criminal-justice-system/>

¹⁸ In 2024, Imkaan and Rape Crisis England and Wales published research on how the asylum system compounds the trauma experienced by asylum seeking victim-survivors of VAWG. Their focus on the poor conditions of accommodation is an important piece of research to understand barriers experienced by this group

models of support such as the Domestic Violence Indefinite Leave to Remain rule (DVILR) to all victim-survivors with insecure immigration status, lifting the No Recourse to Public Funds (NRPF) condition for victim-survivors¹⁹, and funding commitments for specialist *by and for* services and a clear separation between immigration control and access to support (including when reporting a crime).²⁰

“Informed consent” data-sharing proposal

For years organisations like the Latin American Women’s Rights Service, Safety4Sisters and Southall Black Sisters have highlighted the harms of data-sharing between the police and Immigration Enforcement (IE). Multiple stakeholders, including the Domestic Abuse and Victims Commissioners,²¹ Joint Parliamentary Committees²², and Labour when in opposition²³, have supported the call for the establishment of a full firewall between these institutions.²⁴ While the strategy recognises that migrant and asylum-seeking women often do not come forward to report abuse out of fear linked to their immigration status, it introduces a requirement for the police to request victim-survivors’ consent before sharing their information with Immigration Enforcement. This assumption ignores the reality that when migrant and asylum-seeking women encounter the police, they are often fearful, under significant duress, and intimidated while confronting a hostile institution. It also ignores the reality of the practical barriers to informed consent, such as access to interpreters, good legal advice, and understanding of the complex and far-reaching potential consequences of disclosure. No person can give free and informed consent in such circumstances or within such a profound power imbalance. Any presumed consent, and, consequently, any reporting to Immigration Enforcement, would therefore be obtained without an appropriate understanding of their rights and protections, and without a genuine opportunity to freely object. We reject the suggestion that a consent-based information-sharing policy will improve trust and access to justice for migrant women.

The strategy cannot equate consent obtained in such circumstances with a woman’s genuine and informed agreement to onward reporting to IE. The long history of police involvement in the state’s infrastructure for identifying, detaining, and deporting migrants must be acknowledged, as must the well-documented use of deportation threats by perpetrators of abuse as a means of coercive control.²⁵ Black and minoritised

of women.

<https://static1.squarespace.com/static/5f7d9f4addc689717e6ea200/t/672bf0e4fe250e36dda4f7f4/1730932967000/Not+Safe+Here+-+Report.pdf>

¹⁹ Southall Black Sisters has led the campaign to ensure migrant women can access welfare benefits and immigration status independently from perpetrators. <https://southallblacksisters.org.uk/submissions-campaigns/reform-no-recourse-to-public-funds-campaign/>

²⁰ LAWRS leading the Step Up Migrant Women campaign has advocated for the establishment of a firewall between the police and immigration enforcement, to ensure migrant victim-survivors can report abuse safely to the police. <https://lawrs.org.uk/step-up-migrant-women-campaign/>

²¹ <https://domesticabusecommissioner.uk/wp-content/uploads/2022/12/Safety-before-status-The-Solutions.pdf>

²² https://publications.parliament.uk/pa/jt201719/jtselect/jtddab/2075/207509.htm#_idTextAnchor053

²³ <https://www.youtube.com/watch?v=7rwufsfM8s>

²⁴ <https://www.safety4sisters.org/resources/10-ways-greater-manchester-combined-authority-must-support-migrant-women-survivors-of-violence-who-have-no-recourse-to-public-funds>

²⁵ <https://www.thedetail.tv/articles/uk-police-forces-referred-thousands-of-migrant-victims-of-crime-to-immigration-authorities>

migrant women know this well, and their relationship to the police is shaped by it. Furthermore, the strategy and action plan fail to clarify what would occur if a victim-survivor refuses to have her details shared with IE, nor do they outline what enforcement action IE may take upon receiving referrals from the police. This lack of clarity raises serious concerns about both safety and accountability.

Ultimately, based on our extensive expertise, we know the proposal is unworkable and harmful. It rests on the flawed assumption that safe reporting mechanisms can coexist with the involvement of Immigration Enforcement, despite the inherent conflict between safeguarding victim-survivors and enforcing immigration control.²⁶ There must be a full firewall between IE and statutory services for any strategy aiming to protect all victim-survivors of VAWG to work.

Lack of focus on NRPF

One of the most significant gaps in the strategy is the lack of attention to how NRPF increases migrant women's precarity and vulnerability to abuse and re-victimisation. Our organisations see daily how having no recourse to public funds results in the systemic exclusion of migrant women from refuge accommodation, specialist support, and the financial assistance necessary to overcome destitution, as well as creating a need for significantly increased levels of advocacy to support these women. Due to systemic violence and a widespread lack of understanding of the policy, women subject to NRPF are often treated as though they have no rights and are consequently virtually excluded from support provided by statutory agencies and mainstream services. In this context, *by and for* organisations become some of the only safe spaces where they can access help and safety. Latin American Women's Aid has seen an increase in the number of women as well in the complexity of their cases due to their limitations in accessing public funds: in the year of ending in April 2025, 51% of their service users had no access to public funds, an increase of 10% in comparison to the previous year.

Although the Action Plan mentions a commitment to continue investing in the Support for Migrant Victims (SMV) Scheme, this does not go nearly far enough. The SMV Scheme was initially established as a pilot by the former Conservative government after it rejected life-saving amendments to the Domestic Abuse Act 2021. At that time, there was a commitment to review the pilot to advance policy changes that would benefit victim-survivors with NRPF. To date and even following the completion of an evaluation led by the Home Office²⁷, there have been no meaningful or positive changes in this area. In 2023, Southall Black Sisters (lead partner of the scheme) commissioned an independent evaluation of the scheme, which concluded that the support provided under the SMV Scheme was insufficient and that longer-term and more substantial financial support for women was required.²⁸

Overall, this is not a strategy that provides a framework where rights-based protections are set for victim-survivors with insecure immigration status. Instead, it introduces proposals that risk deepening the precarity faced by migrant women, particularly when

²⁶ https://lawrs.org.uk/wp-content/uploads/2022/02/Joint-Response-to-Home-Office-Review_-data-sharing.pdf

²⁷ <https://www.gov.uk/government/publications/evaluating-the-support-for-migrant-victims-smv-pilot/evaluating-the-support-for-migrant-victims-smv-pilot-findings-from-a-process-evaluation>

²⁸ <https://southallblacksisters.org.uk/news/safe-and-secure-the-no-recourse-fund-report-of-findings/>

considered alongside planned changes to settlement routes and the broader transformation of the asylum system. These measures collectively signal a shift toward more restrictive immigration controls that will inevitably exacerbate the barriers already created by NRPF. Crucially, if current NRPF conditions already expose women to severe harm, the Government's proposal in the earned settlement consultation to delay access to welfare support until citizenship rather than settlement would extend the period during which migrant women are left without safety nets. This would significantly heighten their risk of destitution, exploitation, and re-victimisation, and stands in stark contradiction to any commitment to safeguarding survivors.

Access to Justice – Family Courts reform

The strategy's reaffirmation of existing family justice reforms, including commitments to strengthen the Family Justice Board, expand the Pathfinder model and improve transparency in family courts, is welcome. However, these commitments largely restate ongoing reform programmes without recognising the distinct and intersecting barriers faced by migrant and asylum-seeking women navigating the family justice system. Migrant victim-survivors enter family court proceedings with many of the same structural inequalities identified elsewhere in this response, yet these dynamics remain largely absent from discussions on family justice. In practice, the interaction between immigration status, communication barriers, economic precarity and institutional discrimination can shape both access to the courts and the outcomes of proceedings. Without explicit recognition of these factors, reforms risk reproducing existing inequalities rather than addressing them.

Evidence from frontline organisations shows that migrant women frequently encounter multiple and overlapping barriers when attempting to navigate the family courts. These include lacking knowledge of rights and systems, difficulties understanding complex legal processes, and communication barriers that undermine their ability to effectively participate in proceedings. Failures in the provision or quality of interpretation can severely undermine migrant women's participation in family proceedings, making it difficult for victim-survivors to communicate safely about experiences of abuse and increasing the risk that their circumstances are misunderstood or minimised. These barriers are compounded by isolation and misinformation within abusive relationships, which can prevent women from understanding the legal protections available to them or their entitlement to support when entering family proceedings.

Research and advocacy by specialist organisations²⁹ further highlights how perpetrators can weaponise both immigration status and the family court process itself as tools of coercive control. Victim-survivors report that perpetrators frequently exploit their knowledge of the legal system to prolong abuse through litigation, including repeated applications to court or the use of counter-allegations designed to undermine women's credibility. The adversarial nature of family proceedings can therefore become an extension of abuse, particularly where survivors lack legal representation or face additional structural barriers such as restrictions on legal aid. This dynamic is intensified

²⁹ <https://lawrs.org.uk/blog/2021/07/20/family-courts-and-migrant-women/>

for migrant women whose insecure immigration status can be used to intimidate them, threaten deportation, or cast doubt on their credibility in court.

Research has highlighted how institutional responses may focus disproportionately on women's immigration status rather than recognising them as victim-survivors of abuse. Migrant victim-survivors report that professionals within the family justice system may prioritise questions about their legal status or entitlement to services over safeguarding concerns, reinforcing the perception that they are treated primarily as potential immigration offenders rather than victims seeking protection.³⁰ Such dynamics reflect wider "hostile environment" policies that shape interactions between migrant communities and public authorities, and they risk discouraging survivors from engaging with the justice system at all.

At the same time, migrant women who seek to return to their country of origin, where they may have stronger support networks, improved economic prospects and greater safety, may find themselves unable to do so because of the prioritisation of maintaining contact between the child and the other parent.

Concerns about the treatment of migrant and minoritised women in family proceedings have also been raised in wider reviews of the system. The Harm Panel Report³¹ examining domestic abuse in private law children cases received extensive evidence from organisations including Southall Black Sisters. This evidence described the vulnerabilities and sense of powerlessness experienced by Black and minoritised women and migrant in the family justice system. Evidence highlighted pressures within families and communities not to disclose abuse for fear of shame, alongside social and cultural pressures to reconcile with perpetrators and agree child contact even where abuse has occurred. Women with insecure immigration status were identified as particularly vulnerable, sometimes facing an impossible choice between remaining in an abusive relationship or risking deportation and the potential loss of their children. The report also documented additional barriers including language difficulties, isolation, lack of culturally appropriate support, and experiences of racism within the court process. Some participants reported that white ex-partners benefited from racial privilege while they felt "othered" and disbelieved by the system.

Policy shifts toward greater use of non-court dispute resolution also raises concerns in this context. Pressure on victim-survivors to resolve disputes through mediation can create risks for women experiencing abuse and may disproportionately affect Black and minoritised women, who may be compelled to participate in discriminatory faith or community-based dispute resolution processes rather than accessing formal legal protections.

Together, these dynamics demonstrate the need for family justice reforms that explicitly recognise and respond to the intersecting immigration, racial and gendered inequalities shaping migrant women's experiences of the family courts.

³⁰ <https://lawrs.org.uk/blog/2021/07/20/family-courts-and-migrant-women/>

³¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/895173/assessing-risk-harm-children-parents-pl-childrens-cases-report_.pdf

Commissioning landscape

Support services are crucial to ensure victim-survivors are safe and able to recover from abuse. In the case of migrant women, the role of specialist *by and for* organisations is particularly relevant as they are likely to have experienced multiple forms and extended periods of abuse, including institutional discrimination and exclusion from support. It is well evidenced that existing commissioning frameworks have historically disadvantaged specialist *by and for* organisations as they are not able to compete with economies of scale as price over quality considerations continue to drive commissioning decisions to the detriment of these services. A better system is needed to safeguard this vital rights-based provision and ensure adequate and sustainable funding.³²

We understand that the government has laid out its plans to radically reform the commissioning system. We are concerned about the inclusion of *by and for* and women's specialist services in the continuation of procurement policy. Public procurement policy is designed for economies of scale who are able to better compete in an open market. Services offered by women's organisation are not profit-making entities and tend to operate in local communities, serving the women in those communities by providing trauma-informed support through safe pathways. They require sustainable investment of public money and clear recognition of their value. The continued reliance on competition and economies of scale has not led to sustainability in the VAWG sector, especially in adverse economic times when economies of expediency and financial efficiency are defined as "value for money". A perspective that fails to understand that the specialist provision of support offered by *by and for* services cannot be measured in quantity and under a "one size fits all" approach.

Furthermore, the Action Plan does not include or outline a process of accountability for Local Authorities, where most of the commissioning responsibilities lies. For example, there is no mechanism to hold local authorities to account when they decommission these services. Historically, the futility of bringing Local Authorities to account in their commissioning decisions, as well as in their fulfilment of different responsibilities, has posed a massive challenge for the VAWG sector, especially for smaller *by and for* organisations despite some authorities carrying out equality impact assessments. The research is clear on the incomplete nature of such assessments leading to decision-making in commissioning that results in the unnecessary and harmful decommissioning of these services. It is often the case that these organisations have less capacity to apply to a highly competitive process. This arises due to a history of underfunding that has chipped away at infrastructure and core costs. Organisations in this context will always be operating from a position of disadvantage hence, the level playing field, as espoused by procurement policy, is not equitable. We call on government to re-introduce grant funding for specialist services recognising their social value and especially their work to reduce repeat and secondary victimisation. This will ensure a robust economy of provision protecting the social value of these services in providing life-saving support to women who have very few safe access options.

³² For many years, Imkaan, in consultation with its members, has undertaken in depth work on the inequalities in the commissioning landscape for *by and for* organisations.

<https://static1.squarespace.com/static/5f7d9f4addc689717e6ea200/t/61e6a36ba920604b6cad594b/1770906220892/2015+ +Imkaan+ +State+of+the+Sector.pdf>;
https://docs.wixstatic.com/ugd/2f475d_9cab044d7d25404d85da289b70978237.pdf

By and for definition

The strategy states that in the context of a new cross-government commissioning statement a definition of *by and for* and specialist services will be produced. A poor development of the definition will result in a threat to our existence, due to the potential increase in competition for funding. In this analysis, we outline the non-negotiables in the evolution of this definition.

By and for organisations are led by and for the communities we serve. The definition of our services must be understood alongside histories of struggle and resistance. In this vein, defining *by and for* services requires consideration of how historical and structural discrimination has exacerbated the exclusion of victim-survivors experiencing marginalisation from statutory agencies and mainstream services.

A definition of *by and for* services cannot be considered in isolation. It must recognise that our services have been historically established through the fight against racism, exclusion, violence and discrimination against our communities. *By and for* organisations come from the grassroots, with the aim of reducing the exclusion of victim-survivors who are often left with no support. *By and for* organisations are not services that have shifted their focus to take advantage of funding opportunities or trends. Our priorities and focus have remained consistent, as the struggle of our communities continues. Because of this, they are of particular importance and value to those they support.

The specialist domestic abuse sector has long recognised the value of specialist support delivered *by and for* people from communities subjected to marginalisation. This was supported by findings from the Domestic Abuse Commissioner's mapping report of domestic abuse services across England and Wales: 'A Patchwork of Provision',³³ which found that 67% Black and minoritised survivors, 68% LGBT survivors and 55% disabled survivors want to access specialist *by and for* support delivered by their communities. In the same report, the DAC office found that of the Black and minoritised ethnic survivors who accessed *by and for* services, 78% felt safer and 76% felt more in control of their lives, compared to 48% and 55% of those who had accessed another kind of service.

The clear distinction between specialist and generic services is also recognised in the Domestic Abuse Act 2021, in which *by and for* refuge accommodation is referred to as specialist safe accommodation. This statutory guidance has been vital in ensuring that Local Authorities are required to address the needs of racialised and migrant women, by including specific requirements in their commissioning process and provide specialist *by and for* services.

In this sense, any new definition of our services needs to be crafted carefully and in consultation with *by and for* frontline organisations playing a meaningful role, ensuring geographical representation of services and diversity of groups subjected to discrimination, racism and VAWG. Otherwise, the strategy risks causing an immense harm to Black and minoritised migrant and asylum-seeking victim-survivors.

³³ [DAC Mapping-Abuse-Suivivors Long-Policy-Report Nov2022 FA.pdf](#)

Funding

The strategy outlines some funding commitments, including a fund for *by and for* provision. However, there is no clarity in allocations or distribution across the sector and the country. It is key that the definition of this fund is done in consultation with the frontline *by and for* organisations.

Funding must move beyond a narrow focus on short-term service delivery. Currently, commissioning models often incentivise organisations to develop new project-based initiatives specifically to access funding, rather than strengthening and sustaining specialist provision. This can fragment services, divert resources away from frontline support, and undermine long-term organisational stability. There is an urgent need for investing in core and infrastructure funding, including leadership, governance, financial management, training, data systems, and partnership development, to ensure that specialist and *by and for* organisations can operate sustainably and respond flexibly to meet emerging needs. Unrestricted funding is particularly important in enabling organisations to allocate resources where they are most needed, innovate in responses to victim-survivors demand, and maintain independence in advocacy and policy work. Without meaningful core and multiyear investment, the sector risks continued precarity, staff burnout, and loss of trusted community-based provision that migrant and minoritised women rely upon.

We cautiously welcome an increase in the length of funding commitments from one to three years, that enables organisations to plan and deliver services of high quality and reduce the costs of recruitment and loss of experienced staff. However, extending this period to at least 5 years will provide further sustainability, while at the same time reducing the costs for commissioners in processes that tend to be onerous.

Monitoring and evaluation

We understand the importance of evaluating public policy intervention. However, setting the target of halving the number of cases reported disowns the impact that institutional violence has on migrant and racialised survivors who often avoid reporting to the police and other statutory services. Many survivors of VAWG do not seek punitive justice as part of their recovery journey and having an approach that solely focuses on measuring reports disregards other forms of support that effectively address women's needs. Furthermore, in many cases, if women feel it is safe to report VAWG related crimes, the number of records may increase, and this will not necessarily mean a failure in policy intervention. Conversely, a reduction in the number of reports does not necessarily indicate a decrease of abuse. In the context of a hostile environment, fear of data-sharing with IE deters victim-survivors from coming forward. Underreporting could be misinterpreted as a step towards the aim of reducing VAWG rather than a reflection of the entrenched structural barriers migrant women face when seeking help.

Another critical issue to consider is the monitoring and evaluation of the strategy itself. Despite the explicit commitment to public accountability, there is no reference to shadow reporting mechanisms, independent parallel reporting by the VAWG sector, or any formalised external evaluation structures beyond annual government progress reports and parliamentary scrutiny. More concerning still, there is no recognition of the distinct role *by and for* organisations play in supporting Black, minoritised and migrant

victim-survivors, which is essential to ensure all are appropriately supported and gaps in service delivery are addressed. There is no commitment to ringfenced monitoring roles for specialist organisations, apart from vague references to their engagement.

Independent monitoring structures are key to accountability, and if the VAWG strategy aims to progress the government's efforts to halve VAWG in a decade, it must incorporate formal mechanisms for external scrutiny with ringfenced positions for *by and for* organisations. Without this oversight, progress risks being measured solely by government-defined metrics rather than the lived impact on victim-survivors and organisations

Recommendations

- Establish transparent, accessible and meaningful spaces for consultation and accountability for *by and for* organisations to actively be informed about the delivery of the strategy.
- Designate a frontline *by and for* organisation working with migrant women as a permanent member of the Strategy Advisory Board overseeing the implementation of the strategy.
- Ensure *by and for* organisations are at the forefront of the consultation process for the new definition of *by and for* services.
- Reject the introduction of earned settlement models and changes to asylum protection which will harm Black and minoritised migrant, asylum seeking and refugee women.
- Remove proposals involving a surveillance-based “perpetrator management” such as facial recognition, predictive policing, and anti-terrorism-style approaches.
- Introduce clear ring-fenced funding for *by and for* organisations and grant based commissioning. Set up accountability mechanisms for Local Authorities and other commissioners. MOPAC’s *by and for* grant program can be used as guidance model.
- Introduce safeguards for women in prison and immigration detention, including specialist support, trauma-informed assessments, and protection from deportation.
- Establish a full firewall between statutory services (including the police) and Immigration Enforcement, replacing the “consent-based” forms and drawing on tested approaches.
- Remove NRPF restrictions for victim-survivors by extending existing immigration protections for all women such as the DVILR.
- Ensure RSHE is culturally informed, linguistically accessible, and co-designed with young women and specialist *by and for* organisations.
- Set out a clear monitoring and evaluation framework, including how data will be collected, assessed, and reported, and how it will meaningfully reflect intersecting inequalities and experiences.
- Establish independent oversight and monitoring bodies, with clear accountability mechanisms for statutory bodies failing to work towards tackling VAWG.

This response is supported by the following organisations:

1. Asian Women's Resource Centre (AWRC)
2. London Black Women's Project
3. Asha Projects
4. Middle Eastern Women and Society organisation-MEWSO
5. HUMRAAZ
6. Rochdale Women's Welfare Association
7. Roshni
8. Ashiana Network
9. Kurdish and Middle Eastern Women's Organisation
10. Bawso
11. Halo Project
12. P.H.O.E.B.E.
13. ANAH Project
14. End Violence Against Women (EVAW) Coalition
15. Refuge
16. Advance
17. Surviving Economic Abuse
18. Welsh Women's Aid
19. IRISi
20. Standing Together Against Domestic Abuse
21. Woman's Trust
22. SafeLives
23. Respect
24. The Drive Partnership
25. Honour Thy Woman Group
26. The Pankhurst Trust (inc Manchester Women's Aid)
27. SATEDA
28. Bexley Women's Aid
29. Welwyn Hatfield Women's Refuge and Support Services
30. Staying Put
31. East Surrey Domestic Abuse Services
32. Liverpool Domestic Abuse Service
33. NIDAS - Nottinghamshire Independent Domestic Abuse Services
34. Women's Aid Luton
35. Sheffield Women's Aid
36. EVA Women's Aid
37. Nottinghamshire Women's Aid
38. Oasis Domestic Abuse Service
39. Independent Choices Greater Manchester

40. After Exploitation
41. Focus on Labour Exploitation (FLEX)
42. Kalayaan
43. UK BME Anti-Slavery Network, part of AFRUCA Safeguarding Children
44. Lived Experience Collective
45. AFRUCA Safeguarding Children
46. VOICE Lived Experience Panel of West Midlands Anti Slavery Network
47. Working Chance
48. Birth Companions
49. Street Talk
50. Beyond Detention
51. Detention Action
52. South East and East Asian Women's Association (SEEAWA)
53. West London Welcome
54. Joint Council for the Welfare of Immigrants (JCWI)
55. Migration Justice at Law Centre NI
56. The William Gomes Podcast