Written evidence: Immigration and Asylum Bill (Bill 105)

Submitted by AWRC (Asian Women's Resource Centre), 16 October 2026

We are submitting written evidence to the Public Bill Committee on the Immigration and Asylum Bill[1]. Our evidence focuses on how the Bill will affect migrant and minoritised women facing, or at risk of, domestic abuse, harmful practices and honour-based abuse.

1. Summary

1. Immigration reform that is not shaped by, and led in consultation with, by and for VAWG organisations, migrant rights organisations and community-led organisations working with racial, ethnic and religious minorities risks entrenching stereotypes and discrimination against migrants. The Immigration and Asylum Bill does not reflect the expertise of culturally grounded, needs-based, feminist and anti-racist organisations that support migrant women every day. Instead, it rests on a narrative that treats people seeking safety as a cost, a threat or an abuser of the system. Misinformation and scapegoating of this kind have already deepened hostility towards migrant, minoritised and racialised communities[2]. They also reach the women we support, who are often told by perpetrators that no one in this country will believe or protect them.
2. The Bill will make it harder and more dangerous for migrant women to leave situations of domestic abuse, harmful practices and honour-based abuse (HBA). Perpetrators already weaponise women's insecure immigration status in what has been recognised as ‘immigration abuse’[3]. They threaten deportation, withhold passports, refuse to renew visas and tell women that the authorities are on their side. By tightening Article 8, penalising late disclosure, weakening independent appeals and creating new debts to the Home Office, the Bill turns several of those threats into law. The words "domestic abuse" do not appear anywhere in it.
3. The Bill cannot be read in isolation. It is the fifth immigration act in five sessions of Parliament. It sits alongside the earned settlement proposals, which would double the standard route to settlement to 10 years and extend it to 20 years for refugees and people who have received public funds. It also sits alongside the new 30-month "core protection"

[1]Immigration and Asylum Bill (Bill 105), as introduced, available here, 30 June 2026.

[2]Southall Black Sisters and LAWRS, Written evidence (RTS5786), available here, December 2025.

[3]Domestic Abuse Commissioner, Safety Before Status: letter to the Home Secretary, available here, 9 November 2023.

status for refugees[4] and a charge of around £10,000 for asylum support[5]. Taken together, these reforms present a troubling picture of a Government that is punishing migrants rather than protecting them. For survivors, every extra year of precarious status is another year in which an abuser holds power over them.

4. We recommend that the Parliament incorporate a domestic abuse safeguard into the Bill, remove the most punitive Article 8 and credibility provisions, and retain independent judicial appeals. We also ask the Government to end the No Recourse to Public Funds (NRPF) condition for survivors and to abandon the earned settlement proposals. All women deserve protection from gendered violence, especially migrant women who are systemically made more vulnerable to such violence.

2. About AWRC

5. AWRC (Asian Women's Resource Centre) is a specialist, by and for organisation supporting Black, minoritised and ethnic (BME) women and girls affected by domestic abuse and harmful practices[6]. We have provided frontline, holistic, culturally competent and anti-racist support to victim-survivors for over 40 years. Many of the women we support have insecure immigration status or NRPF.

6. Our work with victim- survivors includes risk assessment, safety planning and independent advocacy, including MARAC referrals. We arrange emergency accommodation and subsistence for women with NRPF, make refuge referrals and support women to obtain non-molestation orders. Our OISC Level 1 adviser makes applications under the Migrant Victims of Domestic Abuse Concession (MVDAC), and we signpost women on for specialist immigration advice. We also run an NRPF helpline for survivors and professionals. We deliver trainings for professionals on harmful practices, using a feminist and anti-racist lens.

7. This submission draws on the experience of AWRC caseworkers across projects and includes anonymised case studies.

[4]Southall Black Sisters, Hibiscus, LAWRS and EVAW, joint statement, available here, July 2026. The Lords Justice and Home Affairs Committee report was published on 23 June 2026.

[5]Centre for Women's Justice, Why the government's 'earned settlement' proposals fail victim-survivors of violence against women and girls, available here, March 2026.

[6]Home Secretary, written ministerial statement HCWS1373, 2 March 2026. See EIN, Major overhaul of asylum system introduces 30-month refugee leave under core protection model, available here, March 2026.

3. How insecure status is used to control women

8. Immigration status is one of the strongest tools of coercive control we see. Any change that makes status more fragile, or the route to safety narrower, makes it more difficult for a woman to leave and access urgent support and services.
9. For many women, dependency is built in from the start. If they arrive as spouses or dependants, their right to remain is tied to the perpetrator. One caseworker described how perpetrators "create this idea that he has been doing this favour on women by bringing them to the UK and women should obey their order and if not then they have a power to cancel their visa and send them back." What women know about their status and its legal implications often comes only from the perpetrator or his family. Our caseworkers consistently report that women are told they will be deported immediately if they leave or report abuse. Perpetrators withhold passports, refuse to renew visas, demand money from the woman's family in return for visa renewals and tell her the police will not believe her.

> ***Case study: Ms A.*** Ms A came to the UK on a spouse visa after an arranged marriage. Even on their honeymoon, her husband told her that if she was unhappy he could send her back to Pakistan. In the UK he controlled where she went, vetted her friends and video-called her to check where she was. Her own family told her to be patient and tolerate it. When he overheard her speaking to her sister, he threatened to divorce her and "return her to Pakistan", cut her shoulder with a knife and would not let her seek medical treatment. After a further assault she called the police. AWRC supported her to apply for the domestic abuse concession, which gave her access to public funds, and to obtain a non-molestation order. The council housed her, she was granted indefinite leave to remain (ILR) and she now holds her own tenancy. Ms A told us she "was not aware of her rights as a woman in a foreign country." Temporary access to public funds was the bridge that let her leave and rebuild her life. It is exactly the kind of reliance the Bill's new public-interest tests would count against a woman.

10. Women with NRPF face a choice between staying with the abuser and homelessness or destitution. Caseworkers describe women returning to abusers because they believe it is their only source of housing, income or immigration stability. As one caseworker warned, "in many of these cases the risks can escalate to death."
11. Our experience is echoed across the specialist sector. SBS, LAWRS, Hibiscus and EVAW have described NRPF as "one of the most powerful tools of coercive control,

trapping women in abusive relationships".[7] From January 2023- October 2026, out of 3232 referrals accepted by AWRC, 677 women had NRPF (20.95%). From January 2025- January 2026, AWRC received 884 referrals, out of which 48 referrals were rejected because we were unable to meet support needs around NRPF (13.01%). Out of the 514 referrals accepted, 132 women had NRPF (25.67%), and for 233 women (45.3%), their access to public funds was uncertain/unknown. This data coupled with an evaluation of the nature of calls received on our NRPF helpline (from professionals and women facing domestic abuse) reveals the extent of misinformation and confusion regarding who has access to public funds, and what support is available for women with NRPF.

In 2023–24, 60% of the cases SBS supported involved NRPF. Of the undocumented women LAWRS supported in 2024–25, 61.3% disclosed immigration abuse and 67.7% disclosed financial abuse.[8] Latin American Women's Aid reports that 51% of the women it supported in 2024–25 had NRPF, and 17% said their status was used to control them.[9] Karma Nirvana found that 23% of victims contacting its honour-based abuse helpline had insecure immigration status.[10]

Looking at this overview, these numbers cannot be disregarded. The misinformation and lack of clarity regarding support options for women with NRPF, coupled with weaponisation of insecure immigration status and hostile anti-immigrant narratives put women at increased risk of prolonged abuse and limit access to life-saving services.

12. Support falls far short of need. SBS and LAWRS note that the Support for Migrant Victims scheme is capped at 475 women a year, against the Domestic Abuse Commissioner's estimate that at least 32,000 victims need it.[11]
13. Harmful practices and HBA deepen this patriarchal control. Threats of deportation sit alongside honour, shame and the stigma of divorce. Women fear rejection, social isolation and ostracisation by family and community, and some face threats to kill if they or their children return to their country of origin. Abuse often comes from several family members at once. For racialised minorities in the UK, their families and communities are

[7]Home Office, Immigration and Asylum Bill 2026: impact assessment, available here, 30 June 2026.

[8] See Surviving Economic Abuse and Ipsos UK, Counting the Cost: The Scale and Impact of Economic Abuse in the UK, available here, 2025.

[9] Home Office, Refugee protection to be reviewed every 30 months, available here, 2 March 2026.

[10]Home Office, Asylum seekers will pay towards costs of accommodation, available here, 30 June 2026.

[11]House of Commons Library, Immigration and Asylum Bill 2026 (CBP-10940), available here, 8 July 2026.

an immense source of support, comfort and safety- leaving them is not easy, and may bring severe consequences to other family members as well.

> ***Case study: Ms B.*** Ms B came to the UK on a spouse visa with NRPF after an arranged marriage. She became the only earner in her husband's household, yet her in-laws took her wages and jewellery and blamed her for her husband's ill health and for not having children. Her husband pushed her, made threatening gestures and threatened suicide to stop her leaving. In 2025 the family told her to leave the home immediately, took her to a hotel and left her to pay for it. She declined police action because she feared retaliation from the family and feared that they would interfere with her immigration status. The in-laws then pressured her family in Bangladesh for money, claiming the cost of bringing her to the UK. With AWRC's support she obtained the domestic abuse concession and was granted ILR within months. Her case shows how quickly a victim- survivor can rebuild their life when a secure route to settlement exists, and how much is at stake if those routes are narrowed or made longer.

14. The legal system often reinforces this threatening messaging of perpetrators. Social services and housing departments frequently treat NRPF as a blanket bar and refuse referrals, without considering other legal duties. Forced marriage and family control are still too often treated by statutory services, including the police, as "cultural or family matters" rather than abuse. This tells women what the abuser already told them: that they have no rights and nowhere to go. Our caseworkers also report a severe shortage of legal aid immigration solicitors, because the process of getting paid by the Government is so difficult. Women can wait months for advice.
15. Fear of immigration enforcement is well founded. The Domestic Abuse Commissioner found that every police force in England and Wales shared a domestic abuse victim's data with Immigration Enforcement between April 2020 and March 2023. As she warned, "even one victim's data being shared is enough to deter others from ever reporting to the police and other public services".[12]
16. Women with children face further barriers. Refuges cannot place sons over 16, so families wait for local authority NRPF support. Transferring child benefit from the father to the mother can take six to eight weeks or longer, which delays Universal Credit.

[12]Home Affairs Committee, Earned Settlement: Examining the Government's proposed reforms, Sixth Report of Session 2024–26, available here, 13 March 2026.

17. This is why the women we support need to stay in the UK. They stay to be safe from the perpetrator and from family members abroad, and to protect their children's safety, schooling and health. For them, return can mean HBA, forced marriage, destitution, exclusion as a divorced woman or separation from their children. There is also immense social stigma, wherein patriarchal attitudes and beliefs are used to blame women for 'failed marriages'.

4. The Bill in context: a pattern of punishment

18. This Bill must be read alongside the Government's wider immigration reforms. It would be the fifth immigration act in five sessions of Parliament, after the Nationality and Borders Act 2022, the Illegal Migration Act 2023, the Safety of Rwanda (Asylum and Immigration) Act 2024 and the Border Security, Asylum and Immigration Act 2025. Each has aimed mainly to deter people from seeking asylum in the UK. None has achieved that aim. Instead, each has added dysfunction, delay and cost to the system and increased harm to people in it. This Bill doubles down on the same approach rather than correcting it.

19. Three other reforms change what this Bill will mean for survivors:

- **Earned settlement.** The Home Office's November 2025 consultation, A Fairer Pathway to Settlement,[13] proposes doubling the standard qualifying period for ILR from 5 to 10 years. It would add 10 more years for anyone who has received public funds for over 12 months, giving a 20-year route, and up to 20 more years for people who entered irregularly or overstayed. Applicants would also need to have no debts in the UK. The Home Affairs Committee warned in March 2026 that the plans would very likely increase child poverty and could have a gendered impact on women who are dependants.[14] It quoted concerns that power and coercive control would shift within families.
- **Core protection.** Since 2 March 2026, people granted refugee status receive 30 months' leave instead of five years.[15] Their protection is reviewed each time, and

[13]Southall Black Sisters and LAWRS, Written evidence to the Home Affairs Committee inquiry on Routes to Settlement (RTS5786), available here, December 2025.

[14]Home Office, Immigration and Asylum Bill 2026: equality impact assessment, available here, 30 June 2026.

[15]Home Office, Immigration and Asylum Bill 2026: impact assessment and equality impact assessment, available here, 30 June 2026.

the route to settlement generally takes 20 years. Refugee family reunion remains paused.

- **A charge for asylum support.** On 30 June 2026 the Government announced that asylum seekers would be required to pay around £10,000 towards the cost of their support.[16] The full amount must be repaid before a person can become eligible for settlement. Part 4 of this Bill creates the power to do this.

20. The specialist VAWG sector and Parliament have both warned against these proposals. The House of Lords Justice and Home Affairs Committee rejected extending the qualifying period to 10, 15 or 20 years and recommended keeping the five-year route.[17] The Centre for Women's Justice has argued that earned settlement would discriminate on grounds of sex, race and disability. It also ignores that irregular status and criminal records are often a direct result of abuse.[18] Hibiscus has warned of "a two-tier system of protection in which some survivors are deemed worthy of safety and others are neglected"[19]. SBS and LAWRS describe how women granted the domestic abuse concession already face a three-month "cliff edge", and how visa fees are used as a tool of financial abuse.[20]
21. Taken together, these measures further strengthen a legal system that punishes migrant women and their families, rather than supporting their rights. People are barred from working while they wait years for an asylum decision, then charged for the support they had no choice but to rely on. That debt, and any time spent relying on public funds, then delays their settlement for years.
22. For a victim-survivor, these penalties stack up. A woman who flees abuse with NRPF often needs public funds, a refuge or social services support to get away safely. She may have debts that the perpetrator ran up in her name, or a period without leave because he let her visa lapse. Under the combined reforms, each of these could lengthen her route to settlement or count against her Article 8 claim. Each extra year of precarious status is

[16] Home Office, Asylum seekers will pay towards costs of accommodation, available here, 30 June 2026.

[17] Domestic Abuse Commissioner, Safety before Status: Improving pathways to support for migrant victims of domestic abuse, available here, 2021.

[18] Home Office, A Fairer Pathway to Settlement: A statement and accompanying consultation on earned settlement (CP 1448), available here, 20 November 2025.

[19] Hibiscus, Hibiscus' response to the government's Violence Against Women and Girls strategy, available here, 2025.

[20] Anti-Slavery International, Parliamentary briefing: Immigration and Asylum Bill second reading, available here, July 2026.

another year in which a perpetrator, or his family, can threaten her with deportation and abuse can increase. Reforms that claim to promote "contribution" and "responsibility" would in practice punish women for the abuse they have survived.

5. Impact of the Bill's provisions on migrant survivors

23. The Government says it wants a fairer and faster system. A fair system cannot be one that increases insecurity and fear for people who need respite after fleeing violence, persecution and abuse. The provisions below will fall hardest on women whose status is already controlled by an abuser.

Part 2: Article 8 (clauses 17 to 20)

24. Article 8 claims are a lifeline for survivors who fall outside the narrow domestic abuse immigration routes. These include women on visitor or student visas, undocumented women, women whose visas the abuser let lapse and women trapped in exploitation, often under pressure to pay off debts. The bar is already high, but an Article 8 claim can offer a way out of a dangerous and precarious life. The Bill would narrow this route sharply. The House of Commons Library notes that the impact assessment suggests around 11,700 more Article 8 refusals.[21] In its central estimate, the Government expects these measures to cost £46 million more than they save over ten years.[22]

25. The Bill changes the Article 8 test in five ways:

- **"No weight" to life built while status was precarious (clause 19, section 117B(4)).** Current law gives "little weight" to such ties, with room for judges to consider harsh consequences. The Bill says "no weight" should be given to private or family life established while a person was without leave or in serious breach of conditions. Someone who has lived, worked and raised children in the UK for a decade will not be able to argue that removal would be disproportionate. Many of our clients lost their status because of the abuse itself: the perpetrator did not renew the visa, withheld documents or gave false information to the Home Office. This provision could erase years of a woman's life because of the perpetrator's control.
- **Financial independence and public services (clause 19, section 117B(3)).** Applicants must show they are, and are likely to remain, financially independent, able to house themselves and not be reliant on public services in the long term.

[21]Home Office, Immigration and Asylum Bill 2026: equality impact assessment, available here, 30 June 2026.

[22]Southall Black Sisters and LAWRS, Written evidence (RTS5786), available here, December 2025.

Survivors are often financially dependent because of economic abuse and NRPF, not by choice. A woman who has fled to a refuge, relied on section 17 support for her children or needs mental health care because of trauma could jeopardise her own legal claim.

- **Criminal convictions, cooperation and "good character" (clause 19, new section 117B(3A)).** Even minor non-compliance, such as failing to update an address in time or missing a reporting appointment through illness, could weigh against an applicant. Abusers often control a woman's post, documents and contact with the Home Office, so it is the perpetrator's conduct that would be held against her. Survivors coerced into offending would also be penalised. This provision has a disproportionate impact on women with limited literacy, limited digital capabilities and access, and limited English fluency.
- **The "core cohabiting family" (clause 18, new section 117AA).** Current law recognises that dependency can exist beyond the nuclear family and lets judges consider the wider family. The Bill limits family life "normally" to the core cohabiting family. A woman who has fled may be in a refuge that cannot house her son over 16, or separated from children who remain with the perpetrator. Fleeing abuse should never weaken her family life claim. Ties to adult children, siblings or other relatives who give her safety would be excluded unless there is extra dependency. This would have a disproportionate impact on racial minorities and migrants for whom extended family networks and community support systems may be what their consider to be family.
- **Children (clause 19, sections 117B(6) and (7)).** Removal must have a "very significant and long-lasting adverse effect" on a child before it counts. The Bill does not mention the best interests of the child, which section 55 of the Borders, Citizenship and Immigration Act 2009 makes a primary consideration. Children who witness abuse are victims in their own right under the Domestic Abuse Act 2021.

26. The Government's own equality impact assessment accepts that women "may be more likely to be indirectly affected" by the stronger socio-economic tests. It also names "destitution or exploitation" as the most significant risk where leave is refused but removal does not follow. It does not mention domestic abuse once.[23]

[23] Migrants Rights' Network, Hostile Office, available here, 2024.

> ***Case study: Ms C.*** Ms C came to the UK in 2025 as the spouse of an EU Settlement Scheme holder, with NRPF. She worked full-time as a housekeeper. Her husband tried to take control of her wages, blamed her for his depression and money problems, threatened to throw her out and punched her near her ear. She left and stayed with a neighbour, next door to her husband. Ms C was not destitute, but she was homeless because of abuse. She called AWRC's NRPF helpline after the police gave her the number. She said: "I had no hope that I would be getting any real help because I had no recourse to public funds." AWRC referred her to immigration solicitors and helped her get a non-molestation order and a refuge place. She is now restarting college and awaiting a decision on her ILR application. Her case shows that a woman in full-time work can still need a refuge and public support to escape. Under the Bill's "financial independence" test, that need would count against her.

Claim notices, late claims and credibility (clauses 11, 12 and 36)

27. Clause 11 allows the Home Office to serve a "claim notice" requiring a person to raise every ground for staying by a deadline, and to explain any later information. Clause 36 says delay, inconsistency or "striking similarity" must be treated as damaging credibility in modern slavery decisions unless there are good reasons.
28. Delayed disclosure is a well-documented response to trauma, not a sign of dishonesty. Women may stay silent for years because of shame, fear of family, language barriers, control by the abuser or not knowing that what happened to them is abuse. Our caseworkers see women recognise forced marriage or family control as abuse only after months of specialist support. A woman who is detained or facing removal is often meeting, for the first time, someone she can disclose to. These provisions will lead to genuine victims being disbelieved and removed. This will have a disproportionate impact on minoritised and migrant women who may not report to law enforcement out of fear of being detained, deported, separated from their children and overall racist discrimination and violence from the system.

Protection status (clause 21)

29. Clause 21 lets the Government create a new "protection status" through regulations, without setting out its length or conditions in the Bill. This would put the 30-month core protection model on a statutory footing and leave the detail to secondary legislation, with

little scrutiny. Short, repeated grants of leave make it harder to find work, rent a home and recover. They also keep women in the precarious status that abusers exploit.

Repayment of asylum support (clauses 23 and 24)

30. The Home Office will be able to require people to repay asylum support, recoverable as a debt and collected through HMRC. The detail, including who pays, how much and when, is left to regulations. The Government has given no estimate of how much the policy will raise or what it will cost to enforce. The impact assessment puts no figure on the costs of this power and accepts that its "behavioural impacts" are uncertain. The equality impact assessment identifies "the potential for direct discrimination on the basis of race (nationality)" in the power.[24]
31. People seeking asylum are largely barred from working while they wait for a decision, so they have no choice but to rely on state support. Forcing them into destitution and then making them repay the Home Office is unjust and inhumane. For survivors, debt is also a tool of economic abuse[25]. An abuser can run up or control debt in a woman's name, and a Home Office debt could hold back her settlement for years. The destitution safeguard in clause 23 is welcome but should be strengthened and extended.

Modern slavery (clauses 35 to 39)

32. Many women we support have experienced threats or actual instances and are at risk of forced marriage, domestic servitude or sexual exploitation, which can amount to trafficking. The Bill is built on an assumption that the modern slavery system is being misused, for which no evidence has been presented. Many migrant women who are exploited may choose not to enter the National Referral Mechanism at all. They are held back by fear, mistrust, trauma, insecure status or not understanding the system. Official figures are therefore likely to underestimate the true scale of trafficking.
33. The Bill would:

    - end the recovery period early after a negative conclusive grounds decision, even within the first 30 days (clause 37);
    - allow disqualification on public order grounds, and for claims made in "bad faith", including claims made when a person was due to be removed (clause 38);

[24]Latin American Women's Aid, Annual Report 2024–25, available here, December 2025.

[25]Southall Black Sisters, Hibiscus, LAWRS and EVAW, Settlement, Citizenship and Integration conclusions will harm migrant women: joint statement, available here, July 2026.

- remove the duty to grant leave to remain to help victims recover (clause 39).

34. Without leave to recover, victim-survivors are left exposed to destitution and re-exploitation. Disqualifying people on public order grounds ignores the direct link that often exists between exploitation and offending. This risks breaching Article 4 of the ECHR and the Council of Europe Convention on Action against Trafficking in Human Beings, which require states to identify and assist victims. The equality impact assessment itself accepts that the modern slavery reforms "may disproportionately impact women, who are more likely to be victims of sexual exploitation".[26] Anti-Slavery International has warned that the Bill would "significantly weaken the UK's response to trafficking and modern slavery".[27]

6. Recommendations

35. We urge the Committee to amend the Bill so that survivors of domestic abuse, harmful practices and HBA are protected rather than penalised. Specifically, Parliament should:

- **Insert a domestic abuse safeguard** requiring decision-makers under Parts 1, 2 and 5 to consider whether a person is or has been a victim of domestic abuse, as defined in the Domestic Abuse Act 2021, including harmful practices and HBA.
- **Remove the "no weight" rule in clause 19.** At minimum, exempt time without leave where the loss of status resulted from domestic abuse.
- **Remove the expanded financial independence and good character tests in clause 19.** At minimum, exempt survivors whose dependency, use of services, offending or non-compliance resulted from abuse or exploitation.
- **Widen the definition of family life in clause 18**, so that a separation caused by fleeing abuse never counts against a woman's family life.
- **Make the best interests of the child a primary consideration** on the face of the Bill.

[26] Harmful Practices are forms of violence which have been committed primarily against women and girls in communities and societies for so long that they are considered, or presented by perpetrators, as part of accepted ‘cultural’ practice. In these cases, religion, culture, patriarchal codes of behaviour and perceived notions of ‘honour’ are used by one or more perpetrators as an excuse for coercive control, threats and abuse. The most common are forced or early marriage, so called 'honour' based violence, female genital mutilation or cutting (FGM/C) and other lesser reported forms such as faith-based abuse, menstrual huts, acid attacks, so called ‘corrective’ rape and others. Harmful practices occur across all sexes, sexual identities and genders. They are not unique to a culture or religion. Often one and more forms of harmful practices occur at the same time, escalating risks and resulting in barriers to disclosure. Read more at the Harmful Practices Repository, AWRC, available here.

[27] Karma Nirvana, 2023–2024 helpline data, available here, 8 October 2024.

- **Protect survivors from credibility and late-claim penalties** in clauses 11, 12 and 36, by stating that trauma, coercive control, HBA, fear of the perpetrator and lack of culturally competent advice in appropriate languages are good reasons for delay.
- **Keep immigration and asylum appeals in the independent First-tier Tribunal.**
- **Remove any debt collection from those seeking asylum**.
- **Restore the duty to grant recovery leave** to trafficking survivors (clause 39) and remove the bad faith and public order disqualifications (clause 38).

36. Beyond the Bill, the Government's wider reforms must be reviewed together for their combined impact on survivors. The Government should:

- **Co-design future immigration reform** with by and for VAWG organisations, migrant rights organisations and community-led organisations working on racism and publish full equality impact assessments.
- **Abandon the earned settlement proposals** and the 20-year route for refugees.
- **End NRPF for victim-survivors of abuse**, so that every victim-survivor can access safe accommodation and financial support whatever her status.
- **Extend MVDAC and the domestic abuse settlement route** to all migrant survivors, not only those on partner visas.
- **Create a data-sharing firewall** between public services, including the police, and Immigration Enforcement, so that women can report abuse safely.
- **Fund legal aid immigration advice**, issue mandatory guidance to statutory services on NRPF, immigration abuse, harmful practices and HBA, and fund specialist by and for services sustainably.
- **Mandate domestic abuse training for all immigration and law enforcement officers** that is feminist and anti-racist and designed and delivered by specialist by and for VAWG organisations.

7. Conclusion

37. For the women we support, insecure immigration status is not an administrative detail. It is how perpetrators keep them in abusive homes. Read alongside earned settlement, core protection and the charge for asylum support, this Bill would make that control easier and the route to safety longer and harder. We urge the Committee to amend it so that no woman has to choose between her safety and her right to remain.

38. Policy that affects migrant survivors must be shaped by the people and organisations closest to them. By and for specialist organisations hold expertise that no other part of the system has. We understand how abuse, racism and immigration control intersect in women's lives, and we are trusted by women who fear and mistrust statutory services. Policy made without the lived experiences of migrant and minoritised women risks repeating the stereotypes and harms this submission describes. We ask the Committee, the Home Office and the Government to invite AWRC and other by and for specialist VAWG organisations into these conversations, from the design of policy through to its scrutiny and implementation.