

## **Written evidence submitted by Southall Black Sisters (COR0082)**

### **Summary**

- Southall Black Sisters (SBS)' submission to this inquiry assesses the government's response to the Covid-19 pandemic through the lens of preventing violence against women and girls (VAWG), including domestic abuse. It outlines some of the factors that have placed women at greater risk of harm, with a focus on BME and migrant women.
- There has been a complete failure on the part of government to provide a centrally co-ordinated crisis response to VAWG. Responses from statutory bodies such as social services have been inconsistent and problematic in the current crisis.
- Funding announcements made by the government to protect abused women during the lockdown are inadequate and lacking in transparency. There is considerable uncertainty, chaos and confusion in the VAWG sector about the proportion of funding available to accommodate and support abused women and children in safe spaces. There are also unacceptable levels of inconsistency in local government support for abused women.
- The failure of the government to suspend the No Recourse to Public Funds (NRPF) condition and 'hostile environment' immigration policies has impacted on the most vulnerable women, creating not only a public health crisis but also heightening the risk of abuse for vulnerable migrant women and children.
- The government's response is likely to aggravate pre-existing inequalities, by further marginalising already disadvantaged groups, such as abused BME and migrant women who are disproportionately impacted by Covid-19.
- In order to respond to immediate needs in the context of rising domestic homicides and calls to national helplines, SBS and Compassion in Politics launched a campaign to source hotel and hostel accommodation for abused women supported by the VAWG sector and the London Victim's Commissioner, Victim's Commissioner, Domestic Abuse Commissioner and the Deputy Mayor for Policing and Crime.
- The government must act by making an immediate financial commitment to underwrite the costs of hostels/hostels and support specialist services to meet the additional support needs of abused women and children. The government must develop a central government co-ordinated action plan on VAWG; lift the 'no recourse to public funds' condition; suspend all immigration policies that create the 'hostile environment' and include the Domestic Abuse Commissioner and Victims' Commissioner in all relevant planning and coordination groups, particularly the Covid-19 ministerial group and relevant COBRA meetings.

### **Introduction**

1. Founded in 1979, Southall Black Sisters (SBS) is a leading UK based non-governmental organisation (NGO) for black and minority ethnic (BME) and migrant women. The bulk of our

work is directed at assisting women and children - overwhelmingly survivors of domestic and other forms of gender-related violence - to obtain effective protection and to assert their fundamental human rights. SBS provides advice, advocacy and support to BME and migrant women who represent some of the most marginalised and disadvantaged groups in our society. Many arrive at SBS having experienced violence and abuse and related problems of homelessness, mental illness, poverty and insecure immigration status. Our advice and casework ranges from dealing with one-off enquiries to undertaking mid to long-term casework which covers a number of overlapping support needs. We handle on average 500 new cases and 6500 calls to our helpline each year.

2. Whilst domestic abuse affects women and girls across stratifications of ethnicity and socioeconomic status, SBS and other specialist services for BME women, have long highlighted the fact that there are internal and external factors that place BME and migrant women at greater risk of harm; and act as additional barriers to escaping abuse. BME women are more likely to suffer abuse for longer periods of time and from multiple perpetrators, and are often subjected to discriminatory and unjust responses when they seek help from within their communities or outside bodies.
3. Overall, BME and migrant women are vulnerable to high rates of domestic and sexual violence, sexual and economic exploitation, domestic homicide (including so called 'honour' killings) and suicide.<sup>1</sup> There is some evidence to suggest that migrant and BME women suffer from disproportionately higher rates of these types of deaths linked to a history of abuse.<sup>2</sup>
4. At least 60 per cent of the women that SBS works with have insecure immigration status. Some of these women are dependent on their partners or spouses for their immigration status, whilst others arrive in the UK through other immigration routes. Most become destitute once they flee domestic abuse and then find themselves unable to obtain safety through access to safe alternative accommodation or benefits, due to the NRPF requirement in immigration law. The NRPF requirement is a legal restriction imposed by the UK Border Agency on people subject to immigration control, preventing them from accessing non-contributory welfare benefits and social housing. Breaching this condition puts a person's current or future right to be in the UK at risk. As a consequence, many abused women with NRPF are left homeless and penniless, and often forced to find other means of survival that are full of immense risks and dangers, or to reconcile with their abuser(s).
5. In the UK, in the context of the government's 'stay at home' guidance, the NRPF requirement and cumulative 'hostile environment' policies have heightened the risk that migrant women face, trapping them in abusive environments.
6. This submission assesses the government's response to the Covid-19 pandemic through the lens of preventing VAWG, including domestic abuse, and outlines some of the factors that

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<sup>1</sup> Siddiqui, H. and Patel, M/SBS (2010) Safe and Sane, Available at <http://www.southallblacksisters.org.uk/reports/safe-and-sane-report/>

<sup>2</sup> Mayor of London (2010) The Way Forward Taking action to end violence against women and girls Final Strategy 2010 – 2013, Available at [https://www.london.gov.uk/sites/default/files/the\\_way\\_forward\\_-\\_strategy.pdf](https://www.london.gov.uk/sites/default/files/the_way_forward_-_strategy.pdf)

place women, particularly BME and migrant women, at greater risk of harm. We conclude with some key recommendations to ensure that the government's response to Covid-19 does not continue to exacerbate the risk of harm for these women, or entrench existing inequalities and powerlessness.

### The prevalence of domestic abuse in the current crisis

7. There is long-standing evidence to show that rates of VAWG typically increase in periods of crisis and conflict, including wars<sup>3</sup> and natural disasters. Emerging international evidence from countries including China, Brazil and Cyprus, shows a rise in levels of domestic abuse during the pandemic.<sup>4</sup> It is also well known that these moments of crisis aggravate pre-existing inequalities, by further marginalising already disadvantaged groups.<sup>5</sup> A recent report by the Women's Budget Group states that women constitute the majority of those providing care (both paid and unpaid), the majority of health workers, are more likely to be employed in the service sector, on zero hour contracts and dependent on social security and housing. This means that they are more likely to be exposed to Covid-19 and are more likely to be affected by lockdown and social isolation measures. All of which also increases women's vulnerability to domestic abuse, which intersects with race, age, disability and class, creating immense inequalities.<sup>6</sup>

8. The recent measures announced by the Government in response to the outbreak of Covid-19 have in fact created a conducive context for abuse, particularly the direction for people to 'stay at home'. This is outlined in a briefing by the End Violence against Women and Girls coalition, of which SBS is a member. It says:

*"Isolation is an ideal context for control, for not being detected and for impunity, as connections to colleagues, friends and family are reduced. Any sense of "lawlessness", of the police and other statutory services being diverted elsewhere, and there being fewer onlookers as everyone stays home, can drive perpetrators of sexual violence and exploitation to be more confident to offend, both in families and in the broader community. This means there is a serious risk of increased child sexual abuse online, child sexual exploitation of children and young people who are not in school and unsupervised, and sexual violence against girls by their 'peers' (on and offline), during this crisis."*

9. We don't yet have official figures on the rates of domestic abuse or other forms of VAWG since the Government issued the 'stay at home' guidance in the UK, commonly referred to as 'lockdown', on 23 March. However, multiple sources of data suggest that rates of abuse may have already increased. Between 23 March and 16 April, at least 16 women and two children were killed by their partners or family members.<sup>8</sup> This compares with an average of

<sup>3</sup> <https://www.rescue-uk.org/sites/default/files/document/2051/p868ircsynthesisbriefreportlr.pdf>

<sup>4</sup> <https://www.theguardian.com/society/2020/mar/28/lockdowns-world-rise-domestic-violence>

<sup>5</sup> <https://www.odi.org/sites/odi.org.uk/files/resource-documents/11113.pdf>

<sup>6</sup> <https://wbg.org.uk/wp-content/uploads/2020/03/FINAL-Covid-19-briefing.pdf>

<sup>7</sup> <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/EVAW-Coalition-Briefing-on-COVID19-Pandemic-and-Duty-to-Prevent-VAWG-April-2020-FINAL.pdf>

<sup>8</sup> <https://kareningalasmith.com/2020/04/14/2020/>

five women killed in the same period over the past decade,<sup>9</sup> and we are still awaiting information about a further four women. In the first week of lockdown, the charity Refuge highlighted a 25% increase in calls to the national helpline.<sup>10</sup>

10. We are also concerned that the lockdown will put vulnerable women and children at greater risk of suicide and self-harm in this pandemic, due to increased isolation and reduced access to networks of support. Prior to the pandemic, evidence shows that everyday almost 30 women attempt suicide as a result of experiencing domestic abuse, and three women a week die by suicide to escape abuse.<sup>11</sup> Rates of domestic-abuse related suicide are starker for both black<sup>12</sup> and Asian women.<sup>13</sup>
11. It is our view, and that of many organisations in the VAWG sector, that we won't fully know the extent of VAWG during the pandemic until 'after the crisis'. As with other forms of abuse, the majority of women don't disclose domestic abuse at the time,<sup>14</sup> and the nature of the lockdown also means that many women will be living in circumstances where they are unable to safely seek help, due to living with the abuser(s) and the withdrawal of many front line services and traditional points of face-to-face contact, such as GP appointments. One manager at a refuge explained: *"People are grabbing any free minute to speak to us to arrange to leave safely... There are women whose only opportunity to talk is when they go to the shop, which might not happen again for another few days."*<sup>15</sup> In our experience, rates of disclosure are typically even lower for BME women, particularly South Asian women.
12. The impact of the lack of support for the VAWG sector is likely to fall disproportionately on specialist BME organisations, impacting on their survival and ability to sustain the vital work that they do.<sup>16</sup>
13. This is why we are extremely concerned about the government's inertia in responding to VAWG. It has been extremely frustrating for those of us who work on the frontline to be told that government departments such as the Ministry for Housing, Communities and Local Government (MHCLG) are not in a position to support abused women who need safe accommodation, without first carrying out mapping exercises and surveys to assess levels of demand and the types of accommodation needed. Whilst these are legitimate areas of inquiry in 'normal' circumstances, they cannot be said to constitute a crisis response in the current situation. Urgent interim measures need to be implemented that can thereafter be

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<sup>9</sup> <https://www.theguardian.com/society/2020/apr/19/hotels-refuge-abuse-snubbed>

<sup>10</sup> <https://www.refuge.org.uk/25-increase-in-calls-to-national-domestic-abuse-helpline-since-lockdown-measures-began/>

<sup>11</sup> <http://www.nspa.org.uk/wp-content/uploads/2018/05/Domestic-Abuse-and-Suicide.pdf>

<sup>12</sup> <http://www.cbmeforum.org/wp-content/uploads/2018/02/BAME-domestic-abuse-project-BCWA-BME-forum-2.pdf>

<sup>13</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6068754/>

<sup>14</sup> According to CSEW data for the year ending March 2018, only 18% of women who had experienced partner abuse in the last 12 months reported the abuse to the police: <https://www.womensaid.org.uk/information-support/what-is-domestic-abuse/how-common-is-domestic-abuse/>

<sup>15</sup> <https://www.telegraph.co.uk/women/life/have-five-minutes-need-help-life-domestic-abuse-frontline-coronavirus/>

<sup>16</sup> [https://docs.wixstatic.com/ugd/2f475d\\_9cab044d7d25404d85da289b70978237.pdf](https://docs.wixstatic.com/ugd/2f475d_9cab044d7d25404d85da289b70978237.pdf)

reviewed and adjusted on a regular basis. Indeed, policy recommendations to prevent VAWG during periods of crisis or conflict explicitly state that ‘prevalence data...should not be a prerequisite for funding VAWG programming.’<sup>17</sup>

14. For all these reasons, we are alarmed by the lack of a central government led co-ordination on the prevention of VAWG in the context of Covid-19. There has been no crisis response or central planning, resulting in an utter lack of transparency, as well as confusion and chaos on the ground as to what local authorities should be providing by way of protection and support to abused women and children.

### **The impact of the pandemic on abused black and minority women**

15. After the lockdown was announced, the SBS helpline began to receive calls from women expressing fears for their safety due to the government guidance for families to stay at home. One caller told us:

*“I don't know how long this situation with the virus will last but I'm sure that it's going to be difficult and very stressful for us. It is not obvious and tricky, the gaslighting and the crazy making... I've reached a point like today when my hands are shaking during an argument and I can't stop it! I need your help and your experience to make this self-isolation bearable for me and my son.”*

16. Another caller described her concerns about her husband flouting the ‘stay at home’ guidance, putting her and her children at risk of catching the virus and jeopardising their safety:

*“We are separated but we are still living under the same roof as he refuses to move out. It was okay before because he would be out until late, but the Covid pandemic is causing more upset. I feel pressure because he shouldn't be going out the house anymore, but I have no control over him. He chooses when he wants to go out, putting my children and I at risk of catching the virus. He went out drinking recently, then came home and called me names in front of my child. I'm trying to shield my children from it but I can't. With Covid-19, it's even more intense. I've pleaded with him to go and stay with his family or friends, I told him not to drink at home but he won't listen. He does what he wants, it's a control thing. I feel depressed, alone. I can't call my family to come round anymore, as I don't want to put them at risk. I'm getting more and more anxious that he's going out when he shouldn't be. I'm having to negotiate with him when I don't want to, and I don't know when he's going to retaliate.”*

17. In the light of this, our concern about the declining number of bed spaces available for women in refuges during the pandemic has been realised. By the end of March for instance, at one stage, there was only 1 bed available in refuge accommodation in the whole of Wales

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<sup>17</sup> <https://www.rescue-uk.org/sites/default/files/document/2051/p868ircsynthesisbriefreportlr.pdf>

and a Women's Aid member of staff also reported a 45% reduction in bed spaces. Many refuges suspended new referrals within the first two weeks of the lockdown due to the need to isolate and safeguard other residents or because of the lack of available 'move-on' accommodation. Refuge providers have described the challenges in housing new women, including loss of capacity as increasing numbers of their staff have fallen sick or have been self-isolating. The lockdown measures have also made it more challenging to move women to new accommodation when they are ready to vacate refuge spaces. For example, it has been difficult for refuge providers to assist women to move into new accommodation during the pandemic, because they are unable to obtain key items of furniture such as beds, a fridge or a cooker or to obtain and connect key utility services in the accommodation. .

18. The challenges that we have faced in assisting abused women with safe accommodation are highlighted by our advocacy manager in the following case study:

*"I received a message in the late afternoon from our reception from a police station, who stated that a woman they had arrested wanted to speak to me. Another member of staff, a domestic violence advocate, called the police station to follow up on this, but the officer told her that she only wanted to speak to me and that she was presenting as very distressed. I managed to get through to the police station and it turns out it was a woman I had assisted many years ago, who experienced domestic abuse but had reconciled with the partner, due to familial pressure and her fears about upholding her family's 'honour'.*

*The husband and their child had called the police on her, alleging that she had attacked them. The officer passed the phone to the woman, who explained that the husband and the child had cooked up a story to report her. This was egged on by a family member of the husband coming to live with them recently. The client was very distressed and tearful. I informed the officer that there is a history of abuse and that the woman had been compelled to return due to family pressure/honour. I managed to get the charges dropped.*

*By this time, it was about 6pm and the police were trying to find a place for her to go to. I did a refuge search but none were available. The client tried to call a friend and a relative, but they did not want her in the house due to Covid-19.*

*I tried out of hours social services but the client was too distressed and said she was frightened of being away from the local area, and for her safety in shared accommodation due to Covid-19. By this time, it was 9pm - I did not want to add to her distress. She agreed to go into a hotel.*

*The officer then called me and said he had tried the hotel the client suggested but they were not offering any space. He also tried to call hotels in the area but they were not taking anyone in due to Covid-19. I then called the landlords of the B&B that we sometimes use for women who are abused and destitute and asked if there was a room there. They confirmed that fortunately a room had become available and were able to take the client in for a short period of time.*

*I am working with the client to have her placed in a refuge or to be accepted by local authorities but she remains really distressed by this."*

### **The wider impact of the Covid-19 crisis on abused migrant women**

19. We are particularly concerned about the plight of migrant women impacted by the government's wider 'hostile environment' strategy which continues to deter many from seeking help, even as they are trapped in abusive households as a result of the 'stay at home' guidance. The government has not taken the necessary steps required to reduce or avert domestic abuse towards migrant women in this period, by either suspending the NRPF condition or wider immigration policies that have created the 'hostile environment'.
20. For many migrant women who experience abuse, the NRPF condition leaves them with a dangerous 'choice' between staying in an abusive relationship or facing destitution, homelessness and possibly detention and deportation (with potentially fatal consequences). Many women are too scared to report their experiences to statutory agencies because they are wholly financially and otherwise dependent on their abusive spouses or partners, many of whom use women's immigration status as a weapon of control and coercion. Please see our Domestic Abuse Bill Briefing Paper 2 for case studies of women who were trapped in violent households due to the NRPF condition.<sup>18</sup>
21. As a specialist organisation supporting such women, we have faced even greater difficulties providing safe accommodation for abused women, due to the NRPF condition. Prior to the crisis we faced ongoing challenges since most refuges did not accept abused migrant women with NRPF because of a lack of funding attached. However, we have found that there even the limited refuge spaces that were available have diminished. Supporting migrant women is resource-intensive and most refuges simply do not have the finances to assist with meeting rental and subsistence costs, or the skilled or experienced staff required to resolve migrant women's complex immigration matters. Such women are now less able to stay with friends or family due to the guidance on social distancing and the need to self-isolate. As a consequence, SBS has had to rely on its own finances to place abused migrant women with NRPF, and their children, in selected local B&Bs, but spaces are now full.
22. Another area that concerns us is the policy or practice of data-sharing between the police and the Home Office, when victims report abuse. This policy or practice is the subject of a joint super-complaint between SBS and Liberty<sup>19</sup>, and a legal challenge against the Metropolitan Police, led by SBS. For almost 40 years, SBS has observed that many migrant women with insecure immigration status are too afraid to report their experiences of abuse to the police for fear of retribution from perpetrators and from the state. Perpetrators use women's immigration status as a means of exerting control, allowing them to abuse and exploit women with impunity.

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<sup>18</sup> <https://southallblacksisters.org.uk/wp-content/uploads/2020/03/DA-Bill-Briefing-Paper-2.pdf>

<sup>19</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/767396/Super-complaint\\_181218.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/767396/Super-complaint_181218.pdf)

23. In a super-complaint that we submitted jointly with the civil rights group – Liberty, we stated:

*“In some cases, [abused migrant women] are subjected to an immigration investigation by the police or even arrested, cautioned and detained and even charged with immigration offences, rather than assisted as victims of domestic abuse. It would seem from many of the cases that we have encountered that the police’s overwhelming concern is not the safety and well-being of the women or any children involved but whether or not they are lawfully in the UK. More often than not, no account is taken of the fact that many of these women have a right to make an application to regularise their stay as victims of domestic abuse, but have never had the opportunity to do so or obtained the support needed because they are trapped in abusive marriages or relationships due to fear of and intimidation by their perpetrators who use their immigration status to exert absolute control over them.”*

24. Our concern is that in the current crisis, abused migrant women will be further obstructed from escaping abuse due to the embedding of immigration surveillance in all public and essential services; including healthcare<sup>20</sup>, schools<sup>21</sup>, housing<sup>22</sup> and emergency services, as well as NHS charging for migrants.
25. Whilst Covid-19 has been placed on the list of exempt conditions for NHS charging, this is not sufficient to ensure equitable access to healthcare, as evidence shows that the existence of healthcare charging and ID checking in and of itself will deter migrant populations from seeking help. For example, there is evidence that the current NHS charging policy has a deterrent effect on people with TB, despite TB being an exempt condition.<sup>23</sup> This policy relates to VAWG as healthcare appointments may represent the ‘one chance’ that migrant women have to speak to a professional and disclose abuse, but too many are deterred from accessing these services due to fear of immigration enforcement. One consequence of immigration surveillance in the NHS is the increased likelihood of migrant women being trapped in abuse because a key route to reporting that abuse – through health services – is not available to them.
26. Not only does the threat of immigration enforcement during the pandemic deter migrants from accessing healthcare should they become ill with the virus, it also increases the risk of serious harm to migrant women trapped in abusive households, with limited routes to safety.
27. The government has so far refused to suspend the NRPf condition in the context of the pandemic, despite this demand being made over a month ago by a coalition of organisations, including SBS, the Joint Council for the Welfare of Immigrants, Liberty and Doctors of the World, in a letter dated 16 March, to the Home Secretary.<sup>24</sup> On 30 March, a coalition of more than 40 BME and migrant specialist frontline services, as part of the Step

<sup>20</sup> <http://www.docsnocops.co.uk/about/>

<sup>21</sup> <https://www.schoolsabc.net/>

<sup>22</sup> <https://www.theguardian.com/uk-news/2019/mar/01/right-to-rent-scheme-ruled-incompatible-with-human-rights-law>

<sup>23</sup> <https://www.jcwi.org.uk/covid-19-briefing-to-the-home-affairs-select-committee>



Up Migrant Women coalition, also called on the Home Secretary to abolish the NRPF condition and to ease other immigration restrictions. We have received no response. A separate letter dated 31 March, was sent by The Public Interest Law Centre and Solace Women's Aid to the Secretary of State for Housing, Communities and Local Government, supporting this demand and urging the government to take other immediate measures to protect and support domestic abuse survivors which.<sup>25</sup> As far as we are aware, there has been no response to this either.

### **No Recourse to Public Funds and the response from social services**

28. A substantial proportion of persons with NRPF are single women or women with dependent children. Between 2013 and 2015, over 50,000 individuals with dependents were granted leave to remain in the UK, with the NRPF condition attached.<sup>26</sup>
29. Where there are destitute women with children subject to NRPF, according to legislation local authorities are obliged to safeguard the welfare of children, young people and other vulnerable adults. This includes the provision of accommodation and financial support.<sup>27</sup> However, even prior to the pandemic this was not always realised in practice for a number of reasons, including the climate of austerity and the absence of adequate government statutory guidance and support for those with NRPF. There was and remains considerable inconsistency of practice across the UK, particularly in the context of funding cuts to local authorities which amount to nearly 50 per cent since 2010/11.<sup>28</sup>
30. Our experience and that of other women's organisations, show that local authorities are regularly failing to meet their responsibilities to vulnerable families. On an almost daily basis, SBS is witness to the ways in which abused women and children are turned away by local children's services. Sometimes they are deliberately and disingenuously sent to another agency or another borough and sometimes they are advised to return to their abuser(s) or to their countries of origin - without having gone through the requisite risk or needs assessment. We frequently have to challenge social services both for their failure to carry out assessments, and/or the poor quality of such assessments when they are carried out. For example, between July and September 2019, SBS legally challenged social services on 18 occasions for refusing to provide support under Section 17 to NRPF women with children in the first instance.
31. In the context of the Covid-19 pandemic, local authority responses have become even more problematic. It is taking our advocates significantly longer to make contact with and engage social services and local authority housing departments. Whereas previously, we could attend their offices with our users, this point of access is no longer open to us. This means that we have to spend more time trying to make contact online and by phone, but the waiting time is so lengthy that the chances of making contact at the first attempt are

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<sup>26</sup> <https://www.childrenssociety.org.uk/sites/default/files/nrpf-pen-portrait.pdf>

<sup>27</sup> [http://www.nrpfnetwork.org.uk/policy/Documents/NRPF\\_national\\_picture\\_final.pdf](http://www.nrpfnetwork.org.uk/policy/Documents/NRPF_national_picture_final.pdf)

<sup>28</sup> <https://www.nao.org.uk/naoblog/local-government-in-2019/>

severely limited. Even when our advocates manage to make contact, the process of engagement and resolution of a matter takes much longer. Whereas previously it might have taken two days of physical attendance at social services offices to resolve a matter, vulnerable women and children are now left in conditions of destitution and at serious risk for longer periods of time.

32. SBS operates a 'No Recourse Fund' to provide short term assistance to abused and destitute women and children with NRPF, or those who are denied Section 17<sup>29</sup> or Asylum support, however it is nowhere near enough to meet the level of need or to meet rising demand across the UK. Prior to the crisis, we were campaigning for amendments to the Domestic Abuse Bill, to ensure that it provides meaningful protection for all abused migrant women, many of whom are currently excluded from accessing safety.<sup>30</sup> Our concern is that the current crisis leaves abused migrant women at even greater risk of harm.

### **The inadequacy of government measures on domestic abuse during Covid-19**

33. The government's coronavirus action plan, published 3 March 2020, contained absolutely no information or plans related to addressing or preventing VAWG.<sup>31</sup>
34. On 29 March, 6 days after lockdown was announced, the Home Office published advice and guidance for those experiencing or at risk of domestic abuse during the Covid-19 outbreak. The guidance 'acknowledged' that measures to tackle Covid-19, such as the order to stay at home, can cause anxiety for this group, and provided a list of services available for those who need help.<sup>32</sup> As we understand it, specialist VAWG organisations were not consulted on the content of this guidance. The Home Secretary also stated that £1.6 billion had been given to local councils to help those in need.<sup>33</sup> However, there was no specific guidance to local authorities to use the funds specifically to ensure the safe exit of those trapped in abusive homes, including abused migrant women subject to the NRPF condition or women who do not have leave to remain (such as refused asylum-seekers).
35. On 8 April, 16 days after the lockdown was announced, the Chancellor of the Exchequer announced £750 million for frontline charities, to include those supporting domestic abuse victims. The Chancellor also announced that the government would match public funds raised by the BBC's Big Night In Charity appeal (yet to occur on 23 April).<sup>34</sup> To date, there has been no clarity about what proportion of that funding will be allocated to domestic abuse

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<sup>29</sup> <http://www.legislation.gov.uk/ukpga/1989/41/section/17>

<sup>30</sup> <https://southallblacksisters.org.uk/wp-content/uploads/2020/03/DA-Bill-Briefing-Paper-2.pdf>

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/869827/Coronavirus\\_action\\_plan\\_-\\_a\\_guide\\_to\\_what\\_you\\_can\\_expect\\_across\\_the\\_UK.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/869827/Coronavirus_action_plan_-_a_guide_to_what_you_can_expect_across_the_UK.pdf)

<sup>32</sup> <https://www.gov.uk/government/publications/coronavirus-covid-19-and-domestic-abuse/coronavirus-covid-19-support-for-victims-of-domestic-abuse>

<sup>33</sup> <https://www.bbc.co.uk/news/uk-52081280>

<sup>34</sup> <https://www.gov.uk/government/news/chancellor-sets-out-extra-750-million-coronavirus-funding-for-frontline-charities>

services, including specialist BME services, and there remains uncertainty within the sector about how and when this funding will be received. There are concerns that if funding is provided via existing commissioning channels, rather than directly to charities, this could disadvantage smaller organisations, especially BME VAWG organisations that support marginalised women.

36. On 11 April, 19 days after the lockdown was announced, the Home Secretary launched a public awareness-raising campaign to communicate what forms of help will be available for those at risk of, or experiencing domestic abuse. The campaign, under the hashtag #YouAreNotAlone has sought to reassure victims that support services remain available, and to encourage members of the general public to show solidarity and support by sharing government digital content or a photo of a heart on their palm.<sup>35</sup> But this has not been matched by the resources that are needed to accommodate and support those needing to escape abuse.
37. The following week (commencing 20 April), the government's aim is to publicise adverts raising awareness of how people can seek help across social media, with materials made available to 'a wide range of partners' including charities and supermarkets. The launch was accompanied by the announcement of £2million in funding to 'immediately bolster domestic abuse helplines and online support.'<sup>36</sup>
38. The public awareness campaign has created considerable frustration and 'nervousness' since it 'pushes survivors' to reach out to VAWG services that are already struggling with demand, with no additional resources provided to meet that demand. There are ongoing concerns that frontline services do not have sufficient resources to provide safety to those that need it. Prior to the pandemic, refuges were already unable to cope with current levels of demand. For example, in 2018-19, 64% of referrals to refuges in England were declined. Provision of safe alternative accommodation for migrant women was even worse. In the same year, only 5% of refuge vacancies listed could accommodate women with NRPF<sup>37</sup>. This is precisely why SBS has long had to resort to housing incredibly vulnerable women in B&B accommodation as an emergency measure.
39. We are very concerned that overall, even where government help is forthcoming it is directed at the larger VAWG charities offering helpline support, over smaller specialist charities that work to accommodate and support some of the most marginalised abused women with complex needs.

#### **SBS' campaign to house women in emergency hotel accommodation**

40. In response to the urgent need for emergency accommodation, and in the absence of any national plan of action from government, on 27 March, SBS and the organisation,

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<sup>35</sup> <https://www.gov.uk/government/news/home-secretary-announces-support-for-domestic-abuse-victims>

<sup>36</sup> <https://www.gov.uk/government/news/home-secretary-announces-support-for-domestic-abuse-victims>

<sup>37</sup> <https://www.womensaid.org.uk/funding-crisis-for-domestic-abuse-sector-with-64-of-refuge-referrals-declined/>

Compassion in Politics, wrote a letter to a number of leading hotel chains requesting accommodation, free of charge, for women and children fleeing abuse, in publicly undisclosed locations.<sup>38</sup> Our letter stated that specialist women's support services would need to have an ongoing role in supporting women and children in any such hotel bed scheme to limit risks and ensure safety as much as possible in the crisis situation. This call was supported by over 30 organisations from the VAWG sector, as well as the Chair of the APPG on Domestic Violence and Abuse, Jess Phillips MP, the London Victim's Commissioner, the Victim's Commissioner and the Domestic Abuse Commissioner. The Victim's Commissioner and the Domestic Abuse Commissioner also wrote a separate joint letter to hotels supporting our initiative.<sup>39</sup>

41. Within days of our request, we received an overwhelmingly positive response from large hotel chains and hostel providers. Although they were unable to meet our request to provide rooms free of charge, they offered rooms across the UK at hugely subsidised costs on the basis that they wanted to make a 'contribution to society'. They offered to identify a selection of suitable accommodation options for women and children escaping abuse across the UK, in both major city centres and rural areas. In addition, the hostel provider's offer included locations with garden spaces for women and children to enjoy, meal options and self-catering facilities.
42. On 3 April, we conveyed these offers to the Domestic Abuse team at the Ministry for Housing Communities and Local Government (MHCLG) and reiterated the urgency of meeting the costs of the emergency accommodation, particularly for migrant women and children with NRPF. On 6 April, we provided the MHCLG with an anonymised summary of the hotel and hostel accommodation offers and costs involved. We have yet to receive any further response or information about the MHCLG's plans.
43. On 9 April, we wrote to Chancellor of the Exchequer and the Home Secretary, urging them to respond to our request to underwrite the costs of the hotel and hostel accommodation offered to the VAWG sector. The letter highlighted the fact that there had already been 12 women and children killed by partners or family members since the lockdown. It also referenced similar schemes that had already been established internationally, including in France<sup>40</sup> and Australia.<sup>41</sup> We also outlined the need for additional funding for the VAWG sector to coordinate the hotel bed scheme, and to maintain service delivery during the pandemic. Our letter was again supported by over 30 organisations, and was also endorsed by the Deputy Mayor for Policing and Crime. A spokesperson from one of the nation's largest hotel chains, who has agreed to work with us to implement this initiative said:

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<sup>38</sup> <https://southallblacksisters.org.uk/wp-content/uploads/2020/03/Letter-to-hotel-from-VAWG-sector-Friday-27-March-2020.pdf>

<sup>39</sup> <https://www.theguardian.com/society/2020/apr/19/hotels-refuge-abuse-snubbed>

<sup>40</sup> <https://www.france24.com/en/20200330-france-to-put-domestic-violence-victims-in-hotels-as-numbers-soar-under-coronavirus-lockdown>

<sup>41</sup> <https://www.independent.co.uk/news/world/australasia/coronavirus-homeless-housing-hotels-australia-rough-sleepers-five-star-perth-a9437966.html>

*“We recognise and support the need to help domestic abuse survivors at this critical time. We also understand the urgent need for this to happen and the emotional and physical cost of not doing so. However, we simply cannot do it without government support. We urgently need them to underwrite for us the basic financial costs involved in opening our hotels so that our staff can be un-furloughed and paid, in addition to the right support and security resources being provided to those who come to us for sanctuary.”*

44. We have yet to receive any response from the Home Secretary or Chancellor to our latest letter.
45. Our campaign to secure emergency accommodation for abused women and children received widespread coverage from the likes of the BBC<sup>42</sup>, the Times, The Telegraph<sup>43</sup> and the Guardian.<sup>44</sup> We also launched a campaign video online, of actors reading out the accounts of women who have contacted SBS seeking help during the pandemic, to highlight the distressing circumstances that abused women and children find themselves in, trapped at home with abuser(s)<sup>45</sup> with no alternative accommodation options available to them.
46. In the meantime, we are in contact with the Mayor’s Office for Policing and Crime (MOPAC) about progressing an emergency hotel bed scheme in London, with funding provided by MOPAC. This follows a similar initiative established by MOPAC for homeless people towards the end of March.<sup>46</sup> However, the absence of any funding commitment or coordination from central government means that women and children outside of the capital remain at risk of abuse for the foreseeable future, with inadequate provision to support women and children when they do exit abuse. The level of inconsistency in government’s response and in the provision of life- saving accommodation across the UK is simply untenable and unacceptable, since it exacerbates regional and other inequalities.

#### **Other problems with the government’s response to Covid-19 for VAWG service providers.**

47. A recent investigation by the Sunday Times into the government’s response to the pandemic reported ‘a failure to give an early warning sign to private firms that there might be a lockdown so that they could start contingency planning.’<sup>47</sup> The same can be said for the charity and VAWG sector. We were given no advanced notice of the pending lockdown or guidance about how to support vulnerable groups during the lockdown.
48. The week before lockdown was implemented SBS had a week within which to develop contingency plans in the delivery of frontline services to some of the most vulnerable and isolated women and children in our society. We had to move our entire frontline service to

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<sup>42</sup> <https://www.bbc.co.uk/news/uk-52081280>

<sup>43</sup> <https://www.telegraph.co.uk/women/life/have-five-minutes-need-help-life-domestic-abuse-frontline-coronavirus/>

<sup>44</sup> <https://www.theguardian.com/society/2020/apr/19/hotels-refuge-abuse-snubbed>

<sup>45</sup> [https://www.youtube.com/watch?v=g4nY10OtgYo&feature=emb\\_logo](https://www.youtube.com/watch?v=g4nY10OtgYo&feature=emb_logo)

<sup>46</sup> <https://www.theguardian.com/world/2020/mar/27/councils-told-to-house-all-rough-sleepers-in-england-by-weekend>

<sup>47</sup> <https://www.thetimes.co.uk/article/coronavirus-38-days-when-britain-sleepwalked-into-disaster-hq3b9t1gh>

remote working which meant suspending urgent face to face contact with those seeking help and assistance. This meant closing our face-to- reception, advocacy, support group, language, outreach, training and counselling services. Moving to telephone and online services within a week has been financially and practically challenging. Only this week (commencing 20 April), have we been able to offer our weekly outreach advice surgeries online via Facebook messenger or email, for those who cannot safely contact us by telephone. <sup>48</sup>All staff, and more importantly users, have needed considerable additional support during our transition to working from home, which has added a considerable burden on our IT and technical resources.

49. Since the lockdown measures were put into place, we have noticed an increase in demand from existing users. As a result, we have had to undertake an increased amount of intense advocacy work over the phone or online with each user who contacts us. This means that each engagement with users takes longer than usual in respect of taking statements, gathering evidence and providing much needed legal and other support. This has also involved fielding more helpline enquiries as other routes to seeking help have diminished. Moreover, in the absence of face to face support and the ability of women to 'walk-in' in order to access our services, we have had to increase welfare checks on the most vulnerable users to ensure that they are able to cope with heightened isolation and trauma. This means that checks made on existing users have increased to at least twice a week.
50. The organisation Advice Services Alliance, based in London, conducted a survey of 88 frontline advice services in the last 10 days of March, to assess the impact of the Covid-19 on delivery. The most common concern related to the immediate closure of advice services, particularly face-to-face services for vulnerable client groups. Respondents outlined the practical problems resulting from the immediate and complete closure face to face services, with consequences such as:
- Being unable to help clients with online applications and accounts
  - Difficulties communicating with digitally excluded clients
  - Language barriers relying on phone advice/ no access to translators
  - No home visits
51. SBS' experience very much echoes this conclusion. We are particularly concerned about abused women and children who continue to need some physical support in completing and signing urgent documents for court hearings, for obtaining welfare support, and with travelling to alternative accommodation. Many also need to rely on our IT resources to engage in essential court hearings or appointments via video link. Migrant women who are destitute continue to rely on us to physically deliver food and other necessities and/or make subsistence payments to them on a weekly basis. We have not been provided with any Personal Protective Equipment (PPE) for this essential work.

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<sup>48</sup> <https://southallblacksisters.org.uk/news/sbs-launches-live-outreach-advice-surgeries/>

52. The lack of support for the VAWG sector is likely to fall disproportionately on specialist BME organisations, as this is a group with a 'long history of underfunding and political marginalisation'. Increasing pressure on specialist BME services during the pandemic, without additional funding, could lead to the loss of services and the absorption of smaller providers into generic charities. The withdrawal of high-quality, specialist support for BME women facing abuse will further exacerbate existing inequalities in their access to safety.<sup>49</sup>
53. All of the issues above point to a glaring lack of coordination and inadequate financial support from the government for front-line service providers that are supporting vulnerable groups during the crisis. We have had to absorb the additional cost required to ensure that the needs of our users are met, with varying degrees of success.

### Conclusion and recommendations

54. The Covid-19 pandemic is not only a medical crisis, but a social and political crisis. It is not the virus itself that increases the risk of VAWG, but the combination of its impact and the failure of government to integrate the reduction and prevention of VAWG into its crisis management strategy. There appears to be no sense of urgency on the part of government to ensure that all women and children who face abuse in the UK have effective routes to safety, irrespective of their backgrounds.<sup>50</sup> In order for the government to reduce harm during the Covid-19 pandemic and support all victims of domestic abuse, we make the following recommendations.
55. The government must:
- Make an immediate commitment to provide ring-fenced funding for emergency hotel and hostel accommodation for all women and children escaping abuse, including migrant women with insecure immigration status. This must be accompanied by additional funding for the specialist sector to meet additional support needs and a public awareness campaign that informs abused women and children, not just about the existence of helplines, but of the existence of alternative safe accommodation and support to enable them to escape abuse and live without fear.
  - Lift the 'no recourse to public funds' condition on all visas so that all migrant families, including abused women, can escape abusive households without fear of destitution (or detention)<sup>51</sup>;
  - Develop and publicise a policy that suspends data-sharing in relation to migrants between all statutory services - including the police and healthcare services - and the Home Office, and launch a public information campaign that makes clear that migrants will not face immigration enforcement for reporting abuse;
  - Suspend all immigration policies that create the 'hostile environment for migrants, preventing them from seeking urgent help from statutory services. For example, ensure that

<sup>49</sup> [https://docs.wixstatic.com/ugd/2f475d\\_9cab044d7d25404d85da289b70978237.pdf](https://docs.wixstatic.com/ugd/2f475d_9cab044d7d25404d85da289b70978237.pdf)

<sup>50</sup> [https://www.basw.co.uk/system/files/resources/basw\\_90706-2\\_0.pdf](https://www.basw.co.uk/system/files/resources/basw_90706-2_0.pdf)

<sup>51</sup> There are reports that migrants are still being taken into immigration detention during the pandemic, even where it is known that no removal can take place:

<https://twitter.com/BellaSankey/status/1247875611554709504>

migrant groups are not deterred from accessing any form of healthcare during the crisis, by suspending the NHS Charging Regulations and Section 39 of the Immigration Act 2014

- Deliver an immediate cash injection to the VAWG sector, including ring-fenced funding for services led 'by and for' marginalised groups.
- Include the Domestic Abuse Commissioner and Victims' Commissioner in all relevant planning and coordination groups, particularly the Covid-19 ministerial group and relevant COBRA meetings. Every relevant Secretary of State should receive instructions to ensure that the interests of survivors of VAWG are represented at all levels of departmental Covid-19 response planning and include the prevention of increased levels of VAWG among their priority objectives.
- Ensure that the Domestic Abuse Bill is used as an opportunity to provide meaningful protection for all abused migrant women irrespective of background, taking account of our three proposed amendments in our briefing paper 2.

April 2020