



## 10 Ways Greater Manchester Combined Authority Must Support Migrant Women Survivors of Violence Who Have No Recourse to Public Funds

*“Women with insecure immigration status are excluded, disadvantaged, and increasingly unpopular. Their existence in society has been considered illegitimate, and accordingly the violence against them has been disregarded and their access to justice and safety denied.”<sup>1</sup>*

Immigration status adds barriers to escaping abuse. Migrant survivors worry data will be shared with immigration enforcement and risk deportation if they report. They do not know how to access help. They face difficulties communicating without interpretation, a legal aid sector devastated by cuts, and services unable to assist as they have no recourse to public funds (NRPF). During the pandemic, Safety4Sisters saw demand doubling with 100 percent of women referred initially refused refuge space due to the NRPF condition.<sup>2</sup> In the absence of response, these survivors and their children are left with violent abusers while black and minority ethnic (BME) services struggle to fill gaps in accommodation, counselling, subsistence, and interpretation.

The Greater Manchester Combined Authority (GMCA) has the opportunity to shift these realities, with the development of Homelessness and Gender Based Abuse strategies key entry points to do so. Safety4Sisters charts ten ways the GMCA can reinforce the safety net to make sure all in Greater Manchester – including migrant survivors – are protected.

1. **Encourage Greater Manchester Police to put in place mechanisms for safe reporting by developing guidelines that officers will not share information on migrant survivors with immigration enforcement and establishing safe reporting pathways for migrant victims and witnesses.** This guidance must be socialised with police officers and included in public information campaigns. Doing so would bring the Greater Manchester Police in line with recommendations made by Her Majesty’s Inspectorate of Constabulary and Fire and Rescue Services, College of Policing and the Independent Office for Police Conduct.<sup>3</sup>
2. **Ensure emergency accommodation as a stopgap until refuge space is secured via A Bed Every Night continuing to include NRPF women survivors and providing safe women-only provision accessible to them.** At present, only four spaces across GMCA are for NRPF women specifically and other spaces are mixed and unsuitable for women who have experienced violence. The A Bed Every Night scheme should be extended past its 31 March deadline and the number of safe, women-only spaces for NRPF women increased to at least 20.
3. **Establish an annual NRPF fund of at least £100,000 from GMCA sources not subject to the NRPF condition such as the We Love MCR Charity dedicated to unprotected survivors while they regularise their immigration status.**<sup>4</sup> Safety4Sisters data<sup>5</sup> indicates £100,000 should be initially allocated and more robust data collection can help inform future budgets.

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<sup>1</sup>Safety4Sisters, ‘Migrant Women’s Rights to Safety Pilot Project,’ 2016, p. 3.

<sup>2</sup>Safety4Sisters, ‘Locked in Abuse, Locked Out of Safety: The Pandemic Experiences of Migrant Women,’ 2020, p.5, p.7.

<sup>3</sup>College of Policing, Her Majesty’s Inspectorate of Constabulary and Fire and Rescue Services, and the Independent Office for Police Conduct, ‘Safe to Share? Report on Liberty and Southall Black Sisters’ Super-Complaint on Policing and Immigration Status,’ 2020.

<sup>4</sup>At present, women on spousal visas who experience domestic violence can access the destitute domestic violence provision, local authorities can use their powers to provide accommodation and/ or financial support for families with children under the Children Act 1989, and single women with needs under the Care Act 2014 can access public funds.

<sup>5</sup>From April 2020 to March 2021, Safety4Sisters spent £82,288.53 on accommodation and subsistence costs. This money was spent on providing 31 women who were unable to access refuges due to their immigration status with

4. **Provide violence against women and girls (VAWG) services with either the funding for or access to free interpretation** so language is not a barrier to safety. Of Greater Manchester's 2.7 million residents, 8 percent do not have English as a first language.<sup>6</sup> Many migrant survivors lack the necessary English to access healthcare, housing and legal services and welfare benefits. Access to quality interpretation is a pre-requisite to providing support.<sup>7</sup>
5. **Ensure all GMCA local authorities contribute to funding quality immigration legal aid services to work with NRPF women survivors.** These services will support these women to regularise their immigration status, after which they may not be subject to NRPF and, in many cases, their perpetrators will lose one form of control over them.<sup>8</sup>
6. **Incorporate distinctive support for NRPF women survivors into all commissioning processes and specifications** including additional services such as interpretation, safe accommodation and transport and ring-fence funding for BME specialist services. Currently, commissioning services do not reflect the needs of NRPF women in their criteria. As a result, services commissioned do not always prioritise NRPF women or know how to support them.
7. **Roll out a VAWG strategic communications campaign which includes NRPF women survivors** by being accessible, produced in print, audio and video in different languages, and reaching migrant communities. This campaign should let all women experiencing violence know help is available and how to access it and tackle issues they may worry about (such as data sharing with immigration enforcement). It should include specialist groups working with migrant survivors in design and implementation and be adequately financially resourced.
8. **Better data collection and collation, using qualitative and quantitative methods and a shared working definition of NRPF.** More rigorous data<sup>9</sup> will provide an evidence base for developing and adapting interventions and enabling robust monitoring, evaluation and learning. This process must involve statutory sector leads in social services, housing, police, health and probation, domestic abuse strategic leads, and VAWG services and organisations.
9. **Include VAWG services who work with NRPF women survivors in decision making including in the GMCA Homelessness and Domestic Abuse Fora.** By involving these organisations, including Safety4Sisters, their specialist expertise can inform the development and operationalisation of strategies to effectively support migrant survivors with NRPF.
10. **Advocate for NRPF women survivors with other local governments and with national government.** If these recommendations are implemented, GMCA will serve as a model of good practice. The Mayor must share progress made and lessons learned to persuade other local governments to adopt similar measures and argue for changes to national law and policy.

Safety4Sisters supports migrant women across the North West who have experienced violence and who have no recourse to public funds or state benefits. For more information please contact [info@safety4sisters.org](mailto:info@safety4sisters.org) and visit our website: <https://www.safety4sisters.org/>.

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accommodation and/ or subsistence (average of £2,077 per year per woman), 21 women with accommodation, and 10 women with living subsistence. Of the 125 calls for referral, advice and advocacy that Safety4Sisters received during this time, 38% were calls from Greater Manchester statutory services.

<sup>6</sup>Sisters for Change, 'Unequal Regard, Unequal Protection 2: Spotlight on Manchester,' 2019, p. 17.

<sup>7</sup>From April 2020 to February 2021, Safety4Sisters spent almost £8,000 on interpretation.

<sup>8</sup>At present, only Manchester Local Authority funds immigration legal aid.

<sup>9</sup>For example, on the numbers of migrant survivors presenting with NRPF, whether they are accommodated or turned away, their outcomes, and their challenges and barriers accessing assistance.