

Analysis of the UK Government's May 2025 Immigration White Paper



September 2025



This document sets out the proposals outlined in the UK Government's White Paper "Restoring Control over the Immigration System"¹ and Technical Annex, and provides an assessment of how the proposed changes would impact women and migrant survivors of violence against women and girls, as well as those at risk of exploitation and modern slavery.

Category	Change	Impact on survivors of VAWG, exploitation and modern slavery
Skilled Worker Route Higher Salary Threshold Higher Skills Threshold	For entrants to the Skilled Worker route, from 22 July 2025: - The general salary threshold for Skilled Workers is rising from £38,700 to £41,700* - The skills level has increased from A-level equivalent to degree level equivalent, cutting around 180 eligible occupations** * There is a transitional general salary threshold of £31,300, for Health and Care ASHE roles and people who were granted prior to 4 April 2024 who have been Skilled Workers continuously since then, and who make any further applications before 4 April 2030. ** Individuals granted prior to 22 July 2025, can continue to renew, change employment, and take supplementary employment in occupations beneath degree level. However, it is unclear how long these arrangements will be in place.	- Both of these changes will directly impact recruitment into the <i>by and for</i> VAWG specialist sector. VAWG organisations will struggle to recruit and retain staff that provide the lived experience and cultural awareness necessary to provide effective support to survivors of abuse and exploitation. This poses an existential threat to our organisations, and to the only services that exist that centre Black, minoritised and migrant women. - Gender pay gaps mean women are less likely to meet the higher salary threshold. - The higher skills threshold will disproportionately impact racialised women who often take work in "lower-skilled" roles, or are not promoted as quickly as their male counterparts, including due to caring responsibilities for children.

¹ Home Office, May 2025, *Restoring control over the immigration system: white paper*. Online: <https://www.gov.uk/government/publications/restoring-control-over-the-immigration-system-white-paper>

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Temporary Shortage List (TSL)	- The only new entrants to Skilled Worker who can be sponsored beneath degree level, are those on a shortage list: currently either the Immigration Salary List (ISL) or the Temporary Shortage List (TSL). - A person entering the Skilled Worker route on or after 22 July 2025, who is sponsored beneath a degree level role on the ISL or TSL cannot ordinarily bring their dependent partner or child(ren) with them to the UK. - The TSL will only provide time-limited access. All of the occupations (other than care workers and senior care workers) are due to be removed by the end of 2026, but could be removed sooner. MAC will advise on the terms and conditions for the TSL, and there may be caps. The ISL will be abolished in the future.	- Minoritised women and survivors will find it more difficult to come to or stay in the UK on roles beneath degree level. - Those who manage to find sponsorship in these roles will not be able to sponsor their dependents, including their children, which may result in separation unless an exception applies, e.g. they have sole responsibility or are the sole surviving parent. - These changes remove avenues for survivors and their dependents to leave situations of abuse and obtain/maintain a long-term form of immigration status in the UK.
Closure of Overseas Care Worker Visa	- It is no longer possible to apply overseas to join the Care Worker route. - However, for a transition period, until 22 July 2028, those already in the UK (who have the right to work) can extend, but their route to settlement is unclear after 22 July 2028. - Providers can also sponsor staff who are in the UK under another route, to switch into this route, if they have been employed by their sponsor as a care worker or senior care worker for at least 3 months.	- The closure will disproportionately affect migrant women, including survivors, who often work in care. - They will now have fewer routes to come to the UK, and may instead need to rely on a partner to sponsor them, increasing their vulnerability to abuse and economic dependence.
Overseas Domestic Worker (ODW) visa	The White Paper says the Government will "reconsider the purpose of this route, acting to stop employers exploiting their staff"	- There is no clear timeframe for the "reconsideration". - What is needed is not closure of this route but restoration of the protections the route provided between 1998 and 2012, which allowed women to leave exploitative employers, to find new employers, to be joined with their family members, and to have a route to settlement.

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Family Immigration Policy and Exceptional Circumstances	- Before the end of 2025, there will be a new family immigration policy with the government exploring tighter suitability rules. For those who cannot meet the new policy, there will be a “clear framework to be endorsed by Parliament” that: - strengthens the public interest test - clarifies Article 8 rules for different immigration routes, so fewer cases are treated as “exceptional” - sets out when/how to make a claim on the basis of exceptional circumstances. This ‘legislation’ will be underpinned by regular assessment and updates of impact. It aims to limit claims by: - short-term visitors seeking to stay on the basis of a family relationship - those frustrating and delaying removal with spurious claims - those making immediate claims for wider family members after arriving in the UK, including after a dangerous journey	- It may be more difficult to meet the requirements of the new family immigration policy. - More people may thus be pushed into the new “exceptional circumstances” framework, under which the Government intends for there to be fewer successful applications. - This may disproportionately impact survivors with insecure immigration status, or those who are visitors, who cannot meet the immigration status requirement and currently apply on the basis of “exceptional circumstances”.

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Deportation and Removals	Measures mentioned include: • Simplification of Rules and processes for deporting foreign national offenders • Further targeted action against any recent arrivals who commit crimes • “Stronger powers and proper enforcement” against those who break rules/laws in a bid to “track them down, arrest them, and remove them” • Reforms and stronger measures to ensure laws are upheld and streamlining and speeding up the removals process also due later in 2025 Simultaneously, the Border Security, Asylum and Immigration Bill creates a presumption that a person has committed a particularly serious crime for the purpose of the Refugee Convention if they receive any conviction that would result in them being placed on the Sex Offenders Register, regardless of the length of sentence they receive.	• Will place exceptional burden on survivors who will have to navigate not only hesitation to report abuser(s) to the police but also the subsequent risk that their reporting may lead to deportation of the abuser – in many cases a spouse or other family member • Potential risk of leaving women as long-term sole carers of children
Enforcement	Use information from the eVisa database to: • remind people when their visas are due to expire, or have already expired • identify people staying or working without permission, “track them down and take action against them”	• Lack of safeguards in the system to account for the fact that some people will have insecure immigration status as a result of abuse • Action taken to track people down and take action will aid abusers who seek to control women and girls • Risk of individuals with lawful immigration status being mistakenly recorded as having no status due to eVisa errors or delays in the system leading to wrongful enforcement action and further harm, especially for those already in vulnerable situations.

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Survivors of exploitation of Trafficking and Modern Slavery	Even though the White Paper recognises that “many victims face long waits in having their status as a victim of modern slavery confirmed through the national referral mechanism” and that the delay “can lead to prolonged uncertainty and mental health suffering” it makes no proposals for policy reform.	Migrant women experience overlapping forms of abuse, including trafficking, sexual violence and exploitation. Currently, there are severe delays to the National Referral Mechanism (NRM). This coupled with insecure immigration status compounds their vulnerability and leaves survivors at risk of re-trafficking and further abuse.
Women in need of asylum or humanitarian protection	The White Paper promises: • further reforms to the asylum system and border security, “later this summer”, to stop small boats, end the use of asylum hotels, and reduce irregular migration. • “new policies” with tighter controls, restrictions and scrutiny of those arriving on regular routes (such as student and work routes), who claim asylum, when there has been ‘no material change in their home country’. • improved “robustness of the age assessment process, which includes exploring scientific and technological methods to ensure adults are not wrongly identified as children”, with the Home Office recently announcing the use of an AI technology for “Facial Age Estimation” However, it contains no measures or safe routes for women and girls in need of asylum or humanitarian protection.	• The change is likely to deepen the culture of disbelief, high standard of proof, and difficulty showing they are part of a particular social group that women and girls seeking protection here face • Women and girls are likely to continue to have no safe route to the UK, from their country of persecution, leaving a dangerous journey across Europe to France or the UK as their only option • Women and girls who do arrive in the UK on other safe routes are likely to be considered to be “abusing” the system • Girls may be incorrectly age assessed as adults, through the use of AI-driven technology

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Data sharing and safe reporting for survivors of domestic abuse	For migrant victims of domestic abuse, the White Paper says it will “strengthen the protections in place to support them to take action against their abusers, without fear of repercussion on their immigration status”.	• There is no mention of expanding the scope of immigration protections for migrant victims. • There is no clear promise of a secure reporting mechanism or a commitment to end data sharing between the police and other statutory services and immigration enforcement. It continues to enable impunity for perpetrators and undermines public trust in authorities, if immigration enforcement is prioritised over law enforcement and the protection of victims of abuse. • Migrant survivors are less likely to report abuse or access support for fear of detention and/or deportation.
“Earned settlement”	• The standard qualifying period for settlement will increase from 5 to 10 years, but it can be reduced based on contributions to the UK economy and society. • There will still be a shorter pathway to settlement for dependents of British citizens, provided they remain compliant with the requirements of their leave. • The existing safeguards to protect vulnerable migrants, including settlement rights for victims of domestic abuse, will be retained.	• The extension of the qualifying period for settlement will mean a significantly longer period of insecure immigration status for migrant women in the UK, who will be excluded from recourse to public funds and other state support should they need it. • Migrant women in this position who experience VAWG, but are ineligible for immediate settlement, are less able to exercise their rights to support and safety from abuse through fear of gatekeeping by authorities and/or interfering with or jeopardising their own route to settlement. • Not yet clear, but if “earned settlement” is further tied to a contribution requirement based on income, this may also disproportionately impact women, who are more likely to be in lower-paid, insecure, or part-time work - especially those with caring responsibilities or who have been isolated or prevented from progressing due to abuse.

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English Language Requirements	• Stricter English language requirements across broader visa pathways and settlement, applicable to both main applicants and dependants. • For example, language requirements for workers where a language requirement already applies will increase from B1 to B2 CEFR, and a new A1 CEFR language requirement will be introduced to all adult dependants of workers and students. • For settlement applications, the existing English language requirement of B1 CEFR will increase to B2 CEFR.	• May disproportionately impact migrant survivors who have been socially isolated and/or prevented from learning the English language and accessing resources as a direct result of domestic abuse. • Risk of migrant survivors of becoming undocumented and/or as a result of being dependent on the perpetrators visa. • This also affects the ability to access legal advice, navigate immigration routes and NRM systems, and/or challenge decisions - especially without the support of <i>by and for</i> VAWG organisations.
Legal Aid and Access to Justice	No changes outlined.	The White Paper offers no clarity on how those affected will be supported to understand and navigate these immigration changes. Access to legal advice and representation is crucial for migrant survivors to secure safety and justice. Without high quality, accessible free legal advice and representation: • Women and girls will be at further risk of losing their status and therefore more likely to fall prey to abusers and exploiters. • There will be critical delays in case progression, placing survivors of domestic abuse and trafficking at further risk of abuse or exploitation. • Survivors will not know their rights or be able to challenge refusals or secure protection, especially if they face language, cultural, communication or digital barriers