

# Inquiry: Routes to Settlement



Home Affairs Committee

## Response by the Latin American Women's Rights Service (LAWRS) to the Home Affairs Committee

December 2025

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### About the Latin American Women's Rights Service (LAWRS)

LAWRS is a human rights, feminist organisation run by and for Latin American migrant women living in the UK. We support women who are exposed to violations of their fundamental human rights, facing violence against women and girls, exploitation in low-paid sectors, trafficking, and/or enduring severe poverty and deprivation.

We also advocate for women's rights, migrants' rights and the rights of ethnic minorities at local, national and EU levels, working with sister organisations in the women, anti-trafficking, immigration and racial justice sectors, to tackle the vulnerabilities faced by Latin American women who are affected by intersectional layers of discrimination.

For further information, please visit our website: [www.lawrs.org.uk](http://www.lawrs.org.uk)

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## Summary

As an organisation working with — and composed of — migrant women, we are deeply concerned that longer routes and stricter requirements for settlement will have devastating impacts on migrant households and communities.

The existing immigration system, including its extortionate visa fees and the No Recourse to Public Funds (NRPF) policy, already creates significant financial hardship for migrant women. The proposed changes will deepen migrant destitution, homelessness and child poverty, increasing vulnerability to domestic violence, abuse and exploitation for migrant women. In turn, this devastating impact will incur economic costs to local, regional and national governments, whilst making it exceptionally difficult for the Government to reduce Violence Against Women and Girls (VAWG), homelessness or child poverty.

From a social and personal perspective, the proposals are also likely to increase the risk of falling into an irregular migration status. The fear and uncertainty created will discourage migrant women from engaging with essential services and directly harm the health and wellbeing of migrant households, including children.

Despite the stated aims of these proposals, by increasing poverty, hardship and vulnerability for migrant households, they will make it much more difficult for people to integrate in the UK, both economically and socially. Moreover, a contribution-based model threatens to unfairly disadvantage and punish the most vulnerable migrants. It would be exceptionally difficult for those on low-incomes trying to save for visa fees, for women with caring responsibilities and for victims of domestic violence and exploitation to ‘contribute’ in the ways outlined. Paradoxically, the long-term exclusion of these women will make it even more difficult for them to integrate.

## Introduction

Since the publication of the Immigration White Paper in May 2025<sup>1</sup>, the Government has announced a series of changes to immigration policy, some of which have taken effect already. Proposals around extending the standard qualifying period for settlement or Indefinite Leave to Remain (ILR) from five to ten years, and introducing stricter requirements for settlement eligibility, including language and character-based requirements, are currently being consulted on, and have been partly elaborated in subsequent announcements, including the Home

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<sup>1</sup> 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>

Secretary's November 2025 statement to Parliament.<sup>2</sup> This statement introduced the consultation and outlined a number of additional proposals, including extending the settlement route for refugees to twenty years, and adding penalties of five or ten years to settlement routes for people who claim benefits. No additional protections for victims of domestic violence, abuse or exploitation have been announced.

These proposals, which represent the most devastating escalation of the UK's hostile immigration agenda, are not evidence-based solutions to the problems the government attributes to migration. They are the cruel response to a misleading and institutionally racist narrative that scapegoats migrant communities for systemic failings of the State. With these proposals, the government will only exacerbate harm and discrimination against migrant communities, with the most severe consequences impacting those facing intersecting forms of marginalisation under the current system.

### ***1. What is the likely financial and economic impact of longer routes and stricter requirements for settlement on migrant households already in the UK?***

The likely financial and economic impact of longer settlement routes and stricter requirements is increased poverty, destitution and hardship for migrant households. In turn, this devastating impact will incur economic costs to local, regional and national governments, whilst making it exceptionally difficult for the Government to reduce Violence Against Women and Girls (VAWG), homelessness or child poverty.

### **Migrant destitution**

In 2024, the All-Party Parliamentary Groups (APPGs) on Poverty and Migration characterised the UK's immigration system as creating 'destitution by design', through restrictions like the No Recourse to Public Funds (NRPF) condition and the extortionately high costs of visa applications.<sup>3</sup>

The NRPF condition, which applies to most temporary visas and limits a person's ability to access financial support, dramatically deepens poverty for migrant households. The majority

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<sup>2</sup> Home Office. (November 2025). "The current definition of settlement", A Fairer Pathway to Settlement: statement and accompanying consultation on earned settlement. Online: <https://www.gov.uk/government/consultations/earned-settlement/a-fairer-pathway-to-settlement-statement-and-accompanying-consultation-on-earned-settlement-accessible>

<sup>3</sup> All-Party Parliamentary Group on Migration & All-Party Parliamentary Group on Poverty. (April 2024). The Effects of UK Immigration, Asylum and Refugee Policy on Poverty: A Joint Inquiry by the APPG on Migration and the APPG on Poverty. Online: [https://appgpovertyinequality.org.uk/wp-content/uploads/2024/04/MigrationandPoverty\\_Report2024\\_V2.pdf](https://appgpovertyinequality.org.uk/wp-content/uploads/2024/04/MigrationandPoverty_Report2024_V2.pdf)

(80%) of low-income families with NRPF go without essentials, compared to 59% of similarly low-income families who can access public funds. Half of low-income NRPF households go into debt to pay for necessities, and 60% are in arrears on essential bills, reflecting chronic financial instability.<sup>4</sup> NRPF conditions are especially damaging for people in low-paid, insecure work or people who face sudden changes in circumstances.<sup>5</sup>

An estimated 4 million people are currently subject to the NRPF condition, including 507,000 children.<sup>6</sup> By excluding them from vital safeguards against poverty, long-term severe hardship becomes widespread. Migrant destitution has risen by 136% since 2019, with migrants facing a 35% higher risk of destitution than the UK average.<sup>7</sup> As the APPGs on Poverty and Migration have made clear, tackling migrant destitution is central to meeting key policy objectives, such as ending homelessness and reducing child poverty.<sup>8</sup> Longer settlement routes, which would lengthen the time migrants and their children are subject to the NRPF condition, would therefore deepen widespread migrant destitution, exposing families to long-term hardship.

## Immigration fees

The UK's complex and costly immigration system already creates significant financial pressures for both newly-arrived and long-term migrants. Longer and stricter settlements would increase both direct and indirect costs, exacerbating long-term financial hardship and debt for migrant households.

Over the course of a settlement route, migrants are subject to exceptionally high visa application fees and the costly Immigration Health Surcharge, which can amount to thousands of pounds in application costs.<sup>9</sup> As a frontline organisation, we frequently see migrant families choosing between essential living costs and their visa fees, with many women going into debt to cover costs. Indeed, the Children's Society describes debt as 'a fact of life' for families with NRPF

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<sup>4</sup> Maudie Johnson-Hunter (8th August 2025). "Families with no recourse to public funds are trapped in hardship." *Joseph Rowntree Foundation*. Online: <https://www.jrf.org.uk/deep-poverty-and-destitution/families-with-no-recourse-to-public-funds-are-trapped-in-hardship>

<sup>5</sup> Praxis. (16th December 2024). "Why this Government must address the unique challenges facing migrant children." Online: <https://www.praxis.org.uk/learn/child-poverty-strategy-migrant-children>

<sup>6</sup> Johnson-Hunter. 2025; Praxis. 2024.

<sup>7</sup> Lucy Leon. (7th June 2024). "Beyond the Headlines: Why Rising Migrant Destitution in the UK Needs an Urgent Policy Response." *COMPAS*. Online: <https://www.compas.ox.ac.uk/article/beyond-the-headlines-why-rising-migrant-destitution-in-the-uk-needs-an-urgent-policy-response>

<sup>8</sup> APPG on Migration & APPG on Poverty. 2024.

<sup>9</sup> The Immigration Health Surcharge is currently set at £1,035 per year for most visa and immigration applications and has to be paid up-front for the duration of the visa. For example, someone applying for a 3-year visa must pay £3,105 on top of their application fees. This unfair surcharge means many migrants pay for healthcare twice, given that it is still applied to people who are already contributing to the National Health Service (NHS) via general taxation and National Insurance Contributions.

on the 10-year settlement route<sup>10</sup>, creating a ‘decade of destitution and debt’ for low-income households.<sup>11</sup> The financial burden of these repeated visa costs on the 10-year route directly drives food insecurity and poor mental and physical health, making it exceptionally difficult to escape poverty.<sup>12</sup>

This financial pressure is compounded by the complexity and hostility of the UK’s immigration system. Families are often reliant on specialist legal advice and support from voluntary organisations to understand their options and rights; without this, people risk falling into irregularity or further into destitution.<sup>13</sup> The chronic inaccessibility of free legal advice means our service users often take on additional debt to pay for private advice, adding to the extortionate costs faced.<sup>14</sup> For migrant survivors of domestic violence, abuse and exploitation, these high costs are a barrier to fleeing abuse and accessing justice and safety.

Whilst fee waivers are theoretically available, they are inaccessible in practice. The migrant women we support often need specialist legal advice to submit waiver applications and may struggle to meet the evidentiary requirements. In most cases, the waiver is not available for Indefinite Leave to Remain (ILR) and citizenship applications, preventing people from accessing the benefits of settlement and citizenship even once they become eligible.<sup>15</sup>

Parliamentary research has already described immigration fees as ‘above cost and a direct cause of poverty’, recommending fees be immediately reduced and settlement routes capped to 5 years to limit the financial burden on migrant households.<sup>16</sup> Lengthening settlement routes would mean forcing migrants to pay these costs for longer; the likely impact for migrant households, as stated above, would be increased hardship and destitution.

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<sup>10</sup> Currently, the standard qualifying period for settlement is five years. However, people may be moved onto a 10-year route if they cannot meet the requirements on the standard route: for example if they have changed between visa categories. People whose visa arises from a human rights claim, under family life or private life rules, will be automatically placed on the 10-year route. For instance, a person who cannot meet the Minimum Income Requirement threshold for a family visa but is granted a leave to remain based on the right to family and private life under Article 8 of the ECHR would be placed on the 10-year settlement route. The majority of people on the 10-year route are from Black and minoritised backgrounds. (The Migration Observatory. July 2021. “Migrants on 10-year routes to settlement in the UK. Online:

<https://migrationobservatory.ox.ac.uk/resources/briefings/migrants-on-ten-year-routes-to-settlement-in-the-uk/>)

<sup>11</sup> The Children’s Society. (May 2020). A Lifeline for All: Children and Families with No Recourse to Public Funds. Online: <https://www.childrenssociety.org.uk/sites/default/files/2020-11/a-lifeline-for-all-report.pdf>

<sup>12</sup> Praxis. 2024.

<sup>13</sup> The Children’s Society. 2020.

<sup>14</sup> LAWRS. (September 2025). Call for Evidence: Access to Justice Inquiry. Online: <https://lawrs.org.uk/wp-content/uploads/2025/09/Access-to-Justice-response-Sept-25.pdf>

<sup>15</sup> APPG on Migration & APPG on Poverty. 2024.

<sup>16</sup> APPG on Migration & APPG on Poverty. 2024.

### Rebeca's story

After travelling to the UK on a visitor visa, Rebeca\* became pregnant. Although she wanted to return home, Rebeca's partner and his family persuaded her to stay in the UK and live with him.

Rebeca's partner had promised to marry her and pay for a visa application to regularise her immigration status. However, the relationship became violent and he later refused to get married, saying this would give her "rights" in the country. As a result, Rebeca's visa expired and she became undocumented whilst pregnant.

Without the right to rent or work, Rebeca entirely depends on the father of her child for food, essentials and accommodation. They ended their relationship, but continued to live together for some time, as Rebeca is destitute and has no access to income. She disclosed that the abuse escalated every time she asked her ex-partner for money for food.

When Rebeca's ex-partner refused to support her visa application, she borrowed money to pay for immigration legal advice to submit a fee waiver application. The Home Office rejected this, arguing that Rebeca lives with a partner who has sufficient income to cover the application costs. As a result, Rebeca has been unable to pay for a visa application and remains undocumented. Rebeca gave birth in the UK and now has an additional debt of £12,000 to the NHS for her maternity care. The father of the child refused to help her pay this, claiming the bill is Rebeca's responsibility to resolve.

After Rebeca was detained by immigration enforcement and released on bail, the abuse continued to escalate. She fled the home with her child and is currently homeless. Rebeca has never reported the abuse to the police, as she is afraid that her ex-partner will try to take custody of the child if she does.

\*Name has been changed to protect the woman's identity.

## Housing & homelessness

Lengthening settlement routes and introducing stricter requirements would exacerbate the acute housing disadvantages that migrant households already face, directly undermining the Government's commitment to reducing homelessness.

As we consistently see in our frontline service, migrants and children born to migrant parents are disproportionately likely to live in poverty within the private-rented sector, often in overcrowded housing.<sup>17</sup> Likewise, three-quarters of NRPF households surveyed by the Joseph

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<sup>17</sup> The Children's Society. 2020.

Rowntree Foundation spent more than 30% of their income on housing.<sup>18</sup> Inability to access support like housing benefits and Universal Credit make housing unaffordable for migrant households subject to NRPF, with many ‘forced to rent poor quality accommodation from unscrupulous landlords’ as a result of their economic precarity.<sup>19</sup> Making access to public funds more difficult<sup>20</sup> would further push families into poor-quality housing, reinforcing cycles of homelessness, insecurity and hardship.

For the migrant women experiencing VAWG and exploitation who we support, it is not uncommon to become homeless after fleeing abuse, and the threat of being made homeless is directly weaponised by perpetrators as a form of coercive control. Unfortunately, we often see survivors with NRPF returning to perpetrators as they are unable to access mainstream domestic violence refuges or temporary accommodation.

This is exacerbated by the high rates of financial abuse experienced by women with insecure immigration status.<sup>21</sup> For example, of the 140 women with insecure immigration status supported by our Violence Against Women and Girls (VAWG) Team in 2024-25, over two-thirds (69%) disclosed financial abuse, including theft of money, controlling access to bank accounts and income, or being forced into debt. By subjecting women to insecure immigration status for longer periods, the proposed changes would likely force more migrant survivors to choose between homelessness and living with perpetrators, increasing their exposure to harm and abuse.

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<sup>18</sup> Johnson-Hunter. 2025.

<sup>19</sup> The Children’s Society. 2020.

<sup>20</sup> At present, people with Indefinite Leave to Remain (ILR) can access public funds. The Home Office is currently consulting on several changes that would make accessing public funds more difficult for migrant households - this includes limiting public funds to British citizens and applying a NRPF condition to ILR, or adding 5-10 years to the qualifying period for settlement for people who have been in receipt of public funds during their route to settlement.

<sup>21</sup> Insecure immigration status refers to migrants whose status is temporary or insecure due to waiting for a decision about their permission to stay, because their status is dependent on someone else or because they lack permission to enter or stay in the country. Examples of migrants with insecure status include people who are dependent on their partners’, spouse or other family members’ status, people whose permission to work ties them to an employer, limits their working hours or restricts them from working in other sectors (e.g. seasonal workers, students, overseas domestic workers, etc.), people who are lawfully in the UK but are subject to conditions that restrict their access to full social and economic rights in the UK (e.g. tourist visas, those with No Recourse to Public Funds, people with visas that limit their ‘right to work’ such as asylum seekers and some potential victims of modern slavery in the National Referral Mechanism). It also includes those with undocumented status, such as people who have irregularly entered or stayed in the country, whose leave to enter or remain has expired or has been denied (e.g. refused asylum claims).

## Rosario's story

Rosario\* is from Latin America. She is in the UK on a spouse visa and has no access to public funds.

After moving to the UK, Rosario was subject to domestic abuse by her husband for a decade, including incidents of suffocation, strangulation and threats on her life. During this time, she attempted to report the abuse, but no action was taken by the police.

Rosario became homeless after fleeing the abuse. She contacted LAWRS for support to understand her benefits entitlement. Although Rosario should have been eligible for the MVDAC, she had already submitted a DVILR settlement application.<sup>22</sup> Rosario did not realise that this prevented her from applying for the MVDAC - as a result, she was locked out of this vitally-needed concession.

Rosario had not heard back from the Home Office seven months after submitting her settlement application. Instead, she was supported to apply for the NRPF condition to be lifted on the basis of her destitution while she waited for a response.

After almost a year of waiting, Rosario was granted Indefinite Leave to Remain under the Domestic Violence rules. Whilst Rosario could now access public funds, multi-agency advocacy was still required to help her access the specific benefits needed for her complex circumstances, secure appropriate accommodation and ensure she did not fall back into destitution. Delays in processing benefits applications and receiving the payments meant Rosario continued to rely on foodbanks, crisis payments from charities and the local authority's NRPF team for several weeks.

\*Name has been changed to protect the woman's identity.

## Exploitation

Migrant households are made vulnerable to exploitation by existing immigration rules, which subject them to hardship and can tie them into abusive work conditions. Instead of addressing

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<sup>22</sup> The Migrant Victims of Domestic Abuse Concession (MVDAC) provides a 3-month grant of temporary leave to remain, and access to public funds, for certain migrant survivors of domestic violence. The concession is only available to survivors whose immigration status depends on a partner/spouse who: is a British citizen; has settled status/Indefinite Leave to Remain; has a work or study visa; has refugee status; is a current or former member of the armed forces. On the other hand, Domestic Violence Indefinite Leave to Remain (DVILR) is a permanent settlement status, only available for migrant survivors of domestic abuse whose partners are British citizens, have settled status, or are members of the armed forces. The DVILR replaces any previous immigration status. As the MVDAC grants temporary status outside the immigration rules you cannot apply for it while you have another application in progress, i.e. DVILR application.



this harm and providing protections for migrant workers, the proposed changes will increase the vulnerability of migrant workers to exploitation.

Organisations in the workers' rights and ending modern slavery sectors have consistently highlighted the power imbalance embedded in the UK's visa sponsorship system. Under visa restrictions and sponsorship rules, workers often cannot change employers without risking their immigration status, leaving them unable to report labour rights violations or exploitation.<sup>23</sup> As highlighted by MPs in September 2025, the proposed settlement changes will therefore expand and entrench the 'long-term exploitation' that many migrant workers are subject to.<sup>24</sup>

At the same time, survivors of exploitation are currently seeing access to support through the National Referral Mechanism (NRM) curtailed. As highlighted in our response to the Home Office's recent call for evidence on Identification of Victims of Modern Slavery<sup>25</sup>, not only are First Responder Organisations continually at capacity and struggling to take new referrals, but migrant survivors who are referred into the NRM are also disproportionately assigned to the Immigration Enforcement Competent Authority (IECA).

There are significant, well-evidenced concerns about the quality of decision-making by the IECA, and the disparity in decisions taken by this body and the Single Competent Authority (SCA). Crucially, decisions are more likely to be negative when passed to the IECA. In 2023, 61% of reasonable grounds (RG) decisions made by the SCA were positive, compared to only 33% made by the IECA.<sup>26</sup> There are particular concerns about the IECA's lack of proactive investigation, including the failure to request substantiating evidence from supporting organisations and from the survivor during initial decisions.<sup>27</sup> This leaves only the option to submit reconsideration requests, prolonging survivors' uncertainty over the outcome of their case and creating more work for the organisations supporting them. Overall, the majority of reconsideration requests submitted to both bodies receive a positive outcome, yet the proportion of negative reconsideration decisions made by the IECA is higher than the SCA. For example, in 2024, 25% of CG reconsideration requests taken by the SCA upheld a negative decision, compared to 38%

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<sup>23</sup> A Joint Briefing on Ensuring Safety and Dignity for Migrant Workers in the UK. (July 2024). Online: [https://lawrs.org.uk/wp-content/uploads/2024/07/ASO003-Ensuring-Safety-doc\\_AW5.pdf](https://lawrs.org.uk/wp-content/uploads/2024/07/ASO003-Ensuring-Safety-doc_AW5.pdf)

<sup>24</sup> Adis Sehic, Work Rights Centre. (9th September 2025). "Proposals to double settlement requirements will increase exploitation, MPs tell Home Office." Online: <https://www.workrightscentre.org/publications/2025/proposals-to-double-settlement-requirements-will-increase-exploitation-mps-tell-home-office/>

<sup>25</sup> LAWRS. (October 2025). Call for evidence: Identification of Victims of Modern Slavery. Online: [https://lawrs.org.uk/wp-content/uploads/2025/10/10\\_25-Identification-of-victims-of-MS.pdf](https://lawrs.org.uk/wp-content/uploads/2025/10/10_25-Identification-of-victims-of-MS.pdf)

<sup>26</sup> Taskforce on Survivors of Trafficking in Immigration Detention (Detention Taskforce). 2024. Immigration Enforcement Competent Authority. Online: <https://lawrs.org.uk/wp-content/uploads/2024/07/Detention-Taskforce-IECA-briefing-2.pdf>

<sup>27</sup> Ibidem.

by the IECA.<sup>28</sup> The Independent Anti-slavery Commissioner has highlighted fear of immigration repercussions as the primary factor influencing survivors not to consent to NRM referrals, calling on the Government to 'de-couple modern slavery with immigration' in order to adequately protect and support survivors.<sup>29</sup>

At LAWRS, we are seeing an alarming increase in negative decisions (with positive outcomes following a reconsideration request), at the same time as we are experiencing an increase in cases of domestic servitude and sexual exploitation. Failures in the NRM, coupled with even more restrictive immigration rules, will only worsen the situation of migrant survivors of exploitation and play into the hands of exploiters.

## **Child Poverty**

The likely impact of longer settlement routes and lack of access to public funds for migrant households is an increase in child poverty rates, directly undermining the Government's upcoming child poverty strategy.

As child poverty in the UK grows to unprecedented levels, migrant children face significantly higher poverty rates. Analysis by the Institute for Public Policy Research (IPPR) found that 40% of the 4.45 million children living in poverty have parents born abroad.<sup>30</sup> Children born to migrant parents are twice as likely to experience relative poverty, and make up one-third of all children in deep poverty.<sup>31</sup>

There is a clear causal link between the NRPF condition and child poverty for migrant families. By restricting access to child benefits and childcare entitlements, parents with NRPF struggle to maintain a living wage, trapping them in low-paid jobs or forcing them out of the workforce entirely. Single mothers are disproportionately affected: they account for 85% of applications to lift NRPF conditions.<sup>32</sup> Many of our service users with NRPF are in this position and struggle to protect their children from hardship and destitution.

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<sup>28</sup> The Anti-Trafficking Monitoring Group (2025). Modern Slavery Reconsiderations: Fact Sheet. Online: <https://www.antislavery.org/wp-content/uploads/2025/03/Briefing-Modern-Slavery-Reconsiderations-After-Exploitation-ATMG.pdf>

<sup>29</sup> Independent Anti-Slavery Commissioner (2025). Refusal To Consent: Factors influencing the uptake of modern slavery support under the National Referral Mechanism. Online: <https://www.antislaverycommissioner.co.uk/media/dzmltiwo/refusal-to-consent-final-report.pdf>

<sup>30</sup> Amreen Qureshi, Marley Morris. (25th November 2025). "Making the Child Poverty Strategy work for migrant families." IPPR. Online: <https://www.ippr.org/articles/making-the-child-poverty-strategy-work-for-migrant-families>

<sup>31</sup> Praxis. 2024.

<sup>32</sup> Agnes Woolley. (June 2019). Access Denied: The cost of the 'no recourse to public funds' policy. Online: <https://unity-project.org.uk/wp-content/uploads/2024/11/AccessDenied-thecostoftheNoRecoursetoPublicFundspolicy.TheUnityProject.June2019.pdf>

An estimated 382,000 children in migrant families already endure poverty as a result of the NRPF condition.<sup>33</sup> The proposal to extend settlement routes and delay access to public funds would increase the number of children in this position, directly undermining any attempt to reduce child poverty rates and entrenching long-term poverty for thousands of children.

## **Inaccessibility of concessions**

The limited concessions that do exist to protect migrants from destitution and crisis are inaccessible in practice. Instead of widening eligibility criteria and establishing efficient, accessible concessions, the proposed changes to settlement will further restrict the options available to migrant households, placing people at acute risk of deep and long-term poverty.

Despite the well-established link between NRPF and poverty, only a limited group of visa holders can apply to lift their NRPF condition, and just a small proportion of those eligible succeed in gaining temporary access to public funds.<sup>34</sup> The low rates are partly due to the lack of clear, accessible information on the process for lifting the NRPF condition, as well as the complexity of the application, forcing many migrant households to rely on specialist advice.<sup>35</sup>

Moreover, in the current system migrants who access public funds after becoming destitute are penalised, pushed from the 5-year settlement route onto the 10-year one, which increases the time they experience financial instability and creates distress for households already suffering destitution.<sup>36</sup> The Home Secretary's proposals to drastically increase the penalty for accessing public funds will punish people in crisis for experiencing a destitution that is driven by the immigration system itself.

It is crucial to highlight that many of the migrant survivors of domestic violence and abuse whom we support would fall into this cohort. The Migrant Victims of Domestic Abuse Concession (MVDAC), which provides temporary access to public funds, is only open to a limited group of survivors. Those who are not eligible, including those on student and worker visas, must go through the complex Change of Conditions application and prove destitution to have access to public funds, which carries a risk of the application being denied and the visa withdrawn. Under the proposed settlement changes, the migrant survivors we support to have their NRPF condition lifted would be penalised with a longer settlement route.

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<sup>33</sup> Praxis. (10th February 2025). "How the government can reduce poverty for migrant children." Online: <https://www.praxis.org.uk/learn/how-the-government-can-reduce-poverty-for-migrant-children>

<sup>34</sup> Lucy Leon & Jacqui Broadhead. (May 2024). Executive Summary: Understanding Migrant Destitution in the UK. Online: <https://www.compas.ox.ac.uk/wp-content/uploads/2024-b-Understanding-Migrant-Destitution-in-the-UK-Executive-Summary.pdf>

<sup>35</sup> APPG on Migration & APPG on Poverty. 2024.

<sup>36</sup> The Children's Society. 2020.

### Bruna's story

Bruna\* is from Latin America and lives in the UK on a skilled worker visa. After moving in with the father of her child, she experienced domestic violence. Bruna fled and reported the abuse to the police, but was forced to return to the perpetrator to avoid destitution. Bruna is on maternity leave and has No Recourse to Public Funds (NRPF), making her financially dependent on the father of her child.

Bruna contacted LAWRS for help to understand her rights and options to flee. Although Bruna has a path to settlement as a skilled worker, this depends on her employer renewing the visa. She is worried about how to afford living alone and looking after her child if she leaves. Bruna is not eligible for the MVDAC or DVILR with her visa, limiting her options for safety and stability.

\*Name has been changed to protect the woman's identity.

## Demand on services

A key aim of the Government's proposed changes to the Immigration Rules is to 'reduce pressure on public services.'<sup>37</sup> However, delaying access to public funds and extending the qualifying period for settlement is likely to have the opposite effect.

Excluded from mainstream benefits, many of our service users with NRPF are forced to rely on foodbanks or short-term crisis payments from voluntary organisations. Additionally, many require support from children's social services, who have a statutory duty to protect destitute migrant children in need. The cost to local authorities for supporting destitute migrants has increased by 130%, currently estimated at between £80 and £102 million per year.<sup>38</sup> This adds enormous strain to already overstretched social care budgets for local authorities - indeed, research into the economic cost of NRPF characterises it as 'one of the top pressures on children's services budgets'.<sup>39</sup>

Parliamentarians have highlighted that the current immigration system shifts and obscures the real costs of central government decisions, pushing the burden onto local authorities and the voluntary sector. The rise in down-stream costs, such as temporary accommodation and crisis payments in children's social care budgets, suggests that the NRPF condition does not in fact

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<sup>37</sup> Home Office. (29th September 2025). "New contribution-based settlement model to reduce net migration." Online:

<https://www.gov.uk/government/news/new-contribution-based-settlement-model-to-reduce-net-migration>

<sup>38</sup> APPG on Migration & APPG on Poverty. 2024; Leon & Broadhead. 2024.

<sup>39</sup> Woolley. 2019.

represent a reduction in public expenditure - the costs are simply pushed elsewhere.<sup>40</sup> The rise in hardship and destitution that is likely to result from these proposals will further restrict the ability of local authorities and community organisations to provide essential services.

## ***2. What is the likely social and personal impact of longer routes and stricter requirements for settlement on migrant households already in the UK?***

The likely social and personal impact of longer settlement routes and stricter requirements is increased risk of harm, abuse and exploitation for migrant women. These changes are likely to be devastating for the well-being and safety of our service users and their children, and will undermine community safety in general.

### **Exposure to abuse and exploitation**

Longer settlement routes and stricter requirements are likely to increase migrant women's already disproportionate vulnerability to abuse and exploitation.

Exclusion from mainstream benefits traps migrant women in abusive and exploitative situations and makes them financially dependent on perpetrators. Research shows that women with NRPF are three times more likely than the UK average to experience domestic violence.<sup>41</sup> Moreover, in cases where the perpetrator has access to public funds and the survivor does not, this power imbalance creates financial dependency.

Perpetrators weaponise this dependency—using the threat of homelessness, destitution, or becoming undocumented as a form of coercive control. For many of the service users we support, the visa application process itself also becomes a trigger for escalating abuse: perpetrators may use high application fees to exert control over finances or trap women in debt bondage.

Making it harder for migrant women to access safety, stability and security will increase survivors' exposure to abuse and exploitation, especially for the women who are not eligible for the Domestic Violence Indefinite Leave to Remain (DVILR) settlement route. The Government has so far completely neglected to put any protections in place for the thousands of migrant women who cannot access this path to settlement.

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<sup>40</sup> APPG on Migration & APPG on Poverty. 2024.

<sup>41</sup> Woolley. 2019.

## **Risk of becoming undocumented**

The hostility, complexity and cost of immigration policies already place migrant households at risk of becoming undocumented. For migrant survivors in particular, the risk of dependence on perpetrators and vulnerability to abuse is increased each time immigration rules become more complex and punitive. By making requirements and settlement routes more inaccessible and complex, the Home Office will directly exacerbate these risks.

Migrants often rely on specialist legal advice and advocacy from organisations like LAWRS to understand their rights and options for settlement. However, the civil legal aid crisis and resulting difficulty of accessing affordable legal advice means migrants risk falling into irregularity or incurring significant debt to secure advice.<sup>42</sup> Many of the migrant women we support cannot afford private advice, yet their income places them outside the threshold to qualify for legal aid. We also regularly see women falling victim to unqualified, unscrupulous legal advice providers, or non-legal professionals who give immigration advice, heightening the risk of becoming undocumented. Given the complexity and hostility of the immigration system, the inaccessibility of high-quality advice directly puts migrant women at risk - the proposed measures will only exacerbate this.

Additionally, we frequently deal with cases where migrant women are deliberately made undocumented by perpetrators and exploiters as a form of immigration abuse. In these instances, perpetrators weaponise their knowledge of the UK's immigration system against survivors, forcing them into irregularity in order to maintain control and dependency. Without the right to rent or work, undocumented women are especially vulnerable to abuse and exploitation, including sexual exploitation and domestic servitude. The proposed changes would directly harm these women, punishing them with long-term financial hardship and insecurity and increasing the likelihood of further abuse and exploitation.

Despite framing these proposals in terms of fairness, there has been no consideration of how the increasingly complex, costly and hostile system will make it harder for people to maintain or regularise their legal status. This could mean remaining trapped in destitution, exploitation or long-term abuse.<sup>43</sup> Parliamentarians have warned that the vulnerability to exploitation created by immigration rules directly threatens community safety, emboldening perpetrators, exploiters, criminal gangs and abusive employers.<sup>44</sup> By increasing this vulnerability and failing to provide protections, the proposed settlement changes will make communities less safe.

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<sup>42</sup> The Children's Society. 2020.

<sup>43</sup> LAWRS. September 2025.

<sup>44</sup> APPG on Migration & APPG on Poverty. 2024.

### Isadora's story

Isadora\* is from Latin America. She arrived in the UK on a visitor visa, and is currently undocumented.

After starting a relationship, Isadora was subjected to physical and sexual violence, including non-fatal strangulation and threats on her life. Isadora's partner also sexually exploited her through forced sex work. He controlled her earnings and finances, leaving her completely destitute.

After fleeing the domestic violence and exploitation, Isadora became homeless. A third-party police report was made, leading to her former partner's arrest. However, he began stalking and harassing Isadora after being released on bail.

Isadora contacted LAWRS for urgent support. The LAWRS caseworker explained that Isadora may be able to secure a referral into the NRM as a victim of sexual exploitation. Isadora was confused, as she had been advised by a police officer that she could apply for Indefinite Leave to Remain under the Domestic Violence rules (DVILR). LAWRS secured specialist immigration advice for Isadora - the solicitor explained that she is not eligible to apply for the DVILR, and her chances of successfully applying for the MVDAC were also slim. He advised Isadora to consent to an NRM referral as a victim of sexual exploitation in order to try and secure short-term support.

Unfortunately, Isadora rejected this legal advice, believing it to be incorrect. She said several people, including the police officer, had told her she could apply for the DVILR, and she would seek another solicitor to submit the application. The caseworker and solicitor both expressed serious concerns about Isadora receiving incorrect advice from unqualified professionals, the high costs likely to incur from seeking private legal advice, and the significant risk of further harm and exploitation she may experience without a financial safety net. Ultimately, Isadora disengaged with the service.

\*Name has been changed to protect the woman's identity.

### Fear of engaging with services

Immigration status is already one of the biggest barriers to accessing safety and support. At LAWRS, we regularly work with women who are too afraid to seek help or report their perpetrator or exploiter to the police because of threats linked to their immigration status. In fact, research by LAWRS indicates that the majority of migrant women with insecure

immigration status fear that the police will not support them due to their immigration status, acting as a barrier to reporting domestic violence, abuse and exploitation.<sup>45</sup>

When perpetrators know that migrant women's information can be shared with Immigration Enforcement, this fear is weaponised to control, silence and isolate survivors. This affects not only women who are undocumented, but those who are unsure about their current status, which is another typical outcome of abuse and exploitation of migrant women.

The proposed changes to settlement will make migrant households even less likely to engage with services or to report abuse and exploitation, heightening their risk of further abuse. A key risk is that women who feel unable to report abuse due to fears of negative potential impacts on their immigration status will be tied into visas which trap them with perpetrators and exploiters for prolonged periods of time. The tightening of enforcement also contributes to an already present sense of insecurity and the perception that approaching any organisation might put a survivor at further risk.

Migrant families with insecure immigration status also frequently avoid engaging with local authorities because they fear negative consequences for their immigration status. For example, research from COMPAS and Praxis shows that many people avoid approaching social services or applying for NRPF support despite destitution, and are reluctant to report unsafe or unsuitable housing.<sup>46</sup> This widespread fear creates a major barrier to safeguarding and prevents people from accessing essential protection and support. Proposing additional penalisation for accessing public funds, for example, will entrench this fear and further discourage vulnerable people from presenting at services.

Implementing these changes, while at the same time failing to enforce a clear firewall between statutory services and Immigration Enforcement, will mean that migrant survivors of domestic violence, trafficking, and exploitation will face even greater harm. The growing fear of detention or removal will continue to push survivors into the shadows, preventing them from seeking the protection and justice they deserve.

## **Child welfare**

The immigration system already directly harms the well-being of migrant children. By introducing stricter settlement requirements and extending settlement routes, the likely impact is increased harm to child welfare.

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<sup>45</sup> LAWRS. (May 2019). The Right To Be Believed: Migrant women facing Violence Against Women and Girls (VAWG) in the 'hostile immigration environment' in London. Online:

<https://lawrs.org.uk/wp-content/uploads/2025/01/LAWRS-The-Right-To-Be-Believed-Full-Report.pdf>

<sup>46</sup> Leon & Broadhead. 2024; Leon. 2024; Praxis. 2024.



Children are actively driven into poverty by the immigration system, most starkly through the NRPF condition, which the Children's Society describes as 'the active imposition of persistent poverty on generations of children', in contravention of the Home Secretary's public sector duty to promote child welfare.<sup>47</sup> The devastating impacts of poverty on children are well established: even short-term periods lead to poorer cognitive, educational, behavioural and health outcomes for children, and the exclusion from childcare benefits means migrant children access crucial early years education at lower rates.<sup>48</sup> Long settlement routes compound this harm; under the 10-year ILR route, children experience prolonged hardship throughout much of their childhood, with particularly damaging effects on early development.<sup>49</sup>

The significant pressure that rising migrant destitution places on children's social services also raises urgent safeguarding concerns. Many local authorities are already unable to afford to meet their statutory duties to support destitute children in need, resulting in unlawful refusals of support.<sup>50</sup> As a frontline organisation, we routinely see migrant women and children gatekept from essential safeguarding protections. Without the advocacy of specialist *by and for* organisations, it can be exceptionally difficult for families in these situations to access financial support and advocacy. Extending these harmful conditions to more children, and for longer periods, is likely to cause long-term, large-scale harm to children's welfare. It will also impact the ability of local authorities to fulfil statutory duties and provide other essential services.

## Health and wellbeing

The impact of settlement changes on the health and wellbeing of migrant households is likely to be detrimental. Prolonged hardship, unstable housing and chronic insecurity caused by immigration controls have severe physical and mental health impacts, creating long-term downstream costs for communities and services like the NHS.<sup>51</sup> Indeed, just the announcement of these proposals is already creating immense distress and worry for migrant communities, directly harming the health and wellbeing of our service users.

These harms are compounded by the racist and divisive political rhetoric that has surrounded these proposals. As far-right violence is emboldened and community safety is undermined, *by and for* organisations like LAWRS have urgently raised the specific risks for Black, minoritised and migrant women, particularly as violence against women and girls is weaponised to scapegoat migrant communities whilst obscuring the real causes of violence.<sup>52</sup> Even for people

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<sup>47</sup> The Children's Society. 2020.

<sup>48</sup> The Children's Society. 2020; Praxis. 2024.

<sup>49</sup> Praxis. 2024.

<sup>50</sup> Woolley. 2019.

<sup>51</sup> APPG on Migration & APPG on Poverty. 2024.

<sup>52</sup> End Violence Against Women. (19th August 2025). "100+ women's rights groups warn against racist weaponisation of VAWG." Online:

who are settled or have British citizenship, harmful rhetoric and escalating racist violence directly threatens safety and sense of belonging. These settlement changes will have devastating impacts on community safety, cohesion and migrant well-being.

## **Discrimination and inequalities**

The proposed changes to settlement will also likely exacerbate existing gender, racial and socioeconomic inequalities. Despite this, there appears to be no consideration or impact assessment of the potential for these proposals to drive indirect discrimination and disadvantage specific groups.

The current immigration system already creates inequalities. For example, evidence demonstrates that the 10-year route disproportionately impacts people from Black and minoritised backgrounds, women, and those on low-incomes.<sup>53</sup> Women from Black and minoritised backgrounds, and single mothers in particular, are also disproportionately likely to be negatively affected by the NRPF policy.<sup>54</sup>

Surveys with people on the 10-year route found that the most common occupations held are low-paid but essential roles, including care work, cleaning and nursing assistants, sectors in which Black and minoritised women are overrepresented.<sup>55</sup> Migrant women in these roles are already contributing to the UK's economy, communities and public services through their labour, yet face a longer route to settlement that is fraught with prolonged uncertainty and hardship. Rather than addressing these inequalities, the proposals will magnify these disproportionate impacts, providing quicker routes to settlement for people earning far above the UK average wage and penalising the women who do not have the opportunity to meet this criteria.

Similarly, the Home Office proposals have outlined an option where access to public funds would be limited to citizenship only. As well as prolonging hardship for migrant households eligible for settlement this would exacerbate the already unequal position of British children born to migrant parents with NRPF who are de-facto excluded from mainstream benefits such

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<https://www.endviolenceagainstwomen.org.uk/100-womens-rights-groups-warn-against-racist-weaponisation-of-vawg/>

<sup>53</sup> Lucy Mort, Rivka Shaw & Josephine Whitaker-Yilmaz (2nd March 2023). "Revealed: the 'devastating' impact of 10-year process endured by thousands on course to settle in UK." *IPPR*. Online: <https://www.ippr.org/media-office/revealed-the-devastating-impact-of-10-year-process-endured-by-thousands-on-course-to-settle-in-uk>

<sup>54</sup> Woolley. 2019.

<sup>55</sup> A Joint Briefing on Capping routes to permanent settlement at 5 years. (September 2023). Online: <https://www.praxis.org.uk/briefings/joint-briefing-on-capping-routes-to-permanent-settlement-at-5-years>

as child benefits and childcare entitlements due to their parent's immigration status and nationality, despite being British citizens themselves.<sup>56</sup>

Despite framing the proposals as a 'fairer pathway to settlement', there has been a lack of consideration or acknowledgement that the changes to settlement being explored will likely have profound and disproportionate impacts for certain groups. This represents another step in the Government's consistent failure to assess the impact of immigration changes on migrant households, which the House of Lords has consistently criticised by raising the absence of impact statements and sufficient supporting evidence about these sweeping changes to immigration policy.<sup>57</sup>

### *3. What potential effect could changes to eligibility for settlement have on integration?*

The proposed changes to settlement will make it much harder for migrants to integrate into their communities. Settlement is widely recognised as a key step towards integration. For example, the APPGs on Migration and Poverty concluded that the UK's immigration system causes isolation and poor integration, recommending that all settlement routes be reduced to five years to address this.<sup>58</sup> The Home Office itself characterises settlement as an "important step" in enabling people to integrate and contribute. Making settlement harder to obtain would therefore actively undermine integration.<sup>59</sup>

We are also deeply concerned that the proposed settlement changes will push migrant women who are experiencing exploitation, violence and abuse into further isolation. Secure immigration status is a key step for migrant survivors to be able to rebuild their lives and without this, migrant women are increasingly vulnerable to exploitation and abuse.

## **Economic Integration**

Changes to settlement eligibility will damage economic integration of migrant households. As detailed above, NRP conditions and the extremely high cost of repeated visa renewals already push families into debt and prevent them from building savings or stability. This is particularly

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<sup>56</sup> Woolley. 2019.

<sup>57</sup> House of Lords Secondary Legislation Scrutiny Committee. (25th July 2025). "Lords Committee criticises the Home Office for lack of information about significant changes to immigration policy." Online: <https://committees.parliament.uk/committee/255/secondary-legislation-scrutiny-committee/news/208673/lords-committee-criticises-the-home-office-for-lack-of-information-about-significant-changes-to-immigration-policy/>

<sup>58</sup> APPG on Migration & APPG on Poverty. 2024.

<sup>59</sup> Home Office. November 2025.

harmful for single mothers who are excluded from childcare entitlements and cannot access work as a result.<sup>60</sup>

Evidence from other countries shows that secure settlement improves employment rates, job mobility and earnings, reducing people's exposure to unemployment, under-employment and exploitation.<sup>61</sup> Settlement is therefore vital to economic integration, and restricting access to settlement is likely to hinder participation in the labour market and wider society.

## **Social Integration**

Immigration controls also undermine community participation. The proposed settlement changes are similarly likely to make social integration more difficult.

Years of living “hand-to-mouth” on the 10-year route, combined with cycles of debt, poverty and housing insecurity, make it extremely difficult for families to engage in community life.<sup>62</sup> Families who spend years in survival mode, trying to meet visa costs, avoid destitution and navigate restrictive rules, have little capacity to build social networks or volunteer, making them vulnerable to the proposed punitive measures for failing to integrate.

For children, prolonged insecurity contributes to disrupted schooling and unstable housing, shaping their future wellbeing, outcomes and sense of belonging. Rather than creating the foundations for strong communities, these settlement changes are likely to have the opposite effect.

## ***4. How should “long-term contribution” to the UK be defined and quantified, when considering pathways to settlement?***

Any model which seeks to quantify and weight ‘contributions’, using them to determine settlement paths, is inherently unfair and will place significant additional burdens on migrants, locking out those who simply cannot meet these demands due to the complexity of their circumstances.

It is impossible and unfair to try to quantify the ‘long-term contribution’ of migrant households. For example, social and community contributions can not be accurately measured, and the

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<sup>60</sup> The Children's Society. 2020; Woolley. 2019.

<sup>61</sup> Dr Lucy Mort, Marley Morris. (2nd June 2025). “Not yet settled? Assessing the government's new policy on indefinite leave to remain.” *IPPR*. Online:

<https://www.ippr.org/articles/not-yet-settled-assessing-the-governments-new-policy-on-indefinite-leave-to-remain>

<sup>62</sup> The Children's Society. 2020.

suggestion to incorporate volunteering as a means to reduce settlement periods raises significant concerns about exploitation of the labour of migrants.

Women are more likely to take on unpaid caring responsibilities, which provide indirect social and economic benefits at a societal level, for example, by supporting the healthy development of children and encouraging long-term productivity. The inherent contribution of care work often goes unacknowledged, whilst also making it harder for women to take on paid work or additional responsibilities. The likely impact of any contribution-based settlement model is for women with caring responsibilities to be disproportionately and unfairly penalised, reinforcing gender disparities and socioeconomic inequalities.

As explored already, the hostile and punitive nature of the UK's immigration system already forces families, and migrant women in particular, to live in hardship for prolonged time. Migrant mothers are also systematically excluded from childcare benefits, which curtails their ability to integrate economically or increase their income. The proposed measures would therefore directly and disproportionately harm migrants who are most affected by the destitution that the immigration system creates. Paradoxically, forcing people to endure immigration controls for longer will limit both the fiscal and community contributions that they can make, trapping them in a cycle of never "earning" the ability to settle. Women subject to domestic violence and exploitation, who already have limited control over their earnings and their time, will be significantly disadvantaged by these proposals.

## 5. Recommendations

- **Reduce all settlement routes to a maximum of 5 years** - There is cross-sector consensus, including from Parliament itself, that settlement routes above five years cause hardship, destitution and prolonged insecurity, negatively impacting the ability of people to integrate in the UK. Instead of adding 10 or 20 years of additional time to qualifying settlement periods, all routes should be capped to five years as a maximum.
- **Abolish the No Recourse to Public Funds (NRPF) condition** - Further restricting access to public funds will deepen destitution, child poverty and homelessness, making an increasing number of migrant women and children vulnerable to violence, exploitation and abuse. Instead, NRPF should be abolished to immediately reduce pressure on public services and allow migrant women to economically integrate.
- In the meantime, **support for households with NRPF must be immediately made more accessible** - Eligibility requirements for support should be widened, and information on how to lift the NRPF condition must be made accessible.

- **Extend MVDAC/DVILR model to all migrant survivors** - Currently the domestic violence-specific routes for temporary access to public funds and permanent settlement are only eligible to a small portion of victims, unfairly excluding many migrant women who will be significantly impacted by the proposed changes to settlement.
- **Fund NRPF support and immigration legal advice** - Decades of underfunding for local authorities and legal aid is driving migrant households into destitution and irregular status, putting families at risk and placing additional burdens on over-stretched services. As the immigration system becomes more complex, it is crucial for this safety net to receive long term, sustainable funding to allow them to maintain specialist support for migrant survivors.
- **Bring non-asylum immigration matters back into legal aid scope** - The changes announced this year are sweeping, bringing in complex new rules that will have far-reaching effects on migrants. To ensure people are able to navigate the immigration system and do not fall into irregularity due to inaccessibility of specialist legal advice, it is vital for immigration legal aid to be accessible and funded at all levels to meet the demand.
- **Reduce immigration and citizenship fees to cost** - Immigration fees are directly linked to poverty and are charged significantly over administrative costs. To create a fair system, these fees should be immediately capped at cost-value to ensure that financial hardship is not created by the immigration system itself.
- **Eliminate the Immigration Health Surcharge on visa applications** - The surcharge means that many people are unfairly paying twice for healthcare, at a cost which has a significant financial impact on migrant households.
- **Produce thorough impact and equality assessments for all proposed Immigration Rule changes** - Following from the Windrush Lessons Learned Review, the Home Office must commit to ensuring due diligence and upholding its duty of care to people impacted by its policies, including exploring the indirect consequences of its policies.
- **Establish safe reporting mechanisms for survivors** - An immediate firewall between statutory services and Immigration Enforcement must be implemented to ensure that survivors of domestic violence and exploitation can report abuse and access safety and justice.
- **Push back against far-right rhetoric in immigration policies** - Dangerous and racially discriminatory rhetoric and misinformation has been mainstreamed, putting Black and minoritised migrant and British communities at risk of violence. It is imperative for the

Government to challenge these narratives and base policy on sound evidence and data, not on misinformation and dehumanisation.