

Inquiry: Settlement, Citizenship and Integration



Justice and Home Affairs Committee

Response by the Latin American Women's Rights Service (LAWRS)

January 2026

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

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Summary

We are gravely concerned about the devastating and far-reaching consequences of the Earned Settlement proposals for our service users and our community at large. These changes are also set to prevent the Government from achieving its key aims to reduce Violence Against Women and Girls (VAWG), child poverty and homelessness, by forcing significant numbers of women and children to endure long-term insecurity and financial hardship.

- **Difficulty of getting permanent status** - A system which makes it deliberately difficult and expensive for people to access permanent status will increase destitution and poverty, making migrant women more vulnerable to gender-based violence, modern slavery and exploitation. It will also increase, rather than reduce, pressure on public services and specialist organisations.
- **Previous institutional failings** - The design and implementation of the Government's Immigration White Paper has given little consideration to the impact on migrant communities or *by and for* organisations. The significant potential for discrimination and disproportionate impacts for certain groups has also been overlooked, in what appears to be a continuation of the institutional failings that caused the Windrush scandal.
- **Complexity of applying for ILR** - Recommendations following the Windrush scandal directed the Home Office to simplify immigration rules and make the system more accessible. Instead, the Earned Settlement model vastly increases the complexity of the immigration system.
- **Total costs of applying for ILR** - The UK's visa and settlement costs are already excessive, compared to the actual processing cost and to residence fees in other countries. Extending settlement routes will compound financial hardship, making it more difficult for people to afford settlement once they become eligible.
- **Those who never 'earn' enough to qualify for ILR** - The Earned Settlement model is set to create a cohort of migrants who can never qualify for Indefinite Leave to Remain. The new requirements will disproportionately affect Latin Americans, women, unpaid carers, low-income workers and migrant victims of VAWG, modern slavery and exploitation. Paradoxically, those locked out of settlement will find it significantly more difficult to integrate in the UK.

Is it preferable to have a system whereby it is hard to get a visa but easier to get permanent status, or easy to get a visa but harder to get permanent status? / What are the implications of having many long-term residents on temporary visas without access to ILR and/or citizenship?

1. Making it harder to get permanent status and deliberately embedding long-term precarity into the immigration system will increase destitution and poverty in the UK, adding pressure on public services rather than relieving it. We anticipate that this precarity will cause a significant increase in demand for frontline *by and for* services, without a corresponding increase in funding, as the migrant women we support become more vulnerable to severe financial hardship, domestic abuse and exploitation. This will directly undermine the Government's aim to reduce homelessness, child poverty and violence against women and girls in the UK.

Increased destitution

2. In framing these proposals as a means to end 'near automatic' eligibility for ILR,¹ the Home Office has obscured the difficulties experienced by people as they wait to become eligible for permanent status. Parliamentary analysis of the UK's immigration rules characterises it as a system that creates 'destitution by design', through the No Recourse to Public Funds (NRPF) condition and the extortionate cost of visa applications.²
3. An estimated 4 million people currently have NRPF, including 507,000 children.³ The condition applies to most temporary visas and limits a person's ability to access financial support, dramatically deepening poverty for migrant households. Half of low-income NRPF households go into debt to afford necessities, and 60% are in arrears on essential

¹ Home Office. (28th November 2025). 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>

² 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

³ 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>; 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>

bills. The majority (80%) of low-income families with NRPF go without essentials, compared to 59% of similarly low-income families who can access public funds.⁴

4. Both migrant destitution and child poverty rates in the UK have grown to unprecedented levels. Migrant destitution has risen by 136% since 2019, with migrants facing a 35% higher risk of destitution than the UK average.⁵ Likewise, children born to migrant parents are twice as likely to experience relative poverty, and make up one-third of all children in deep poverty.⁶
5. There is a clear causal link between the NRPF condition and child poverty. 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, accounting for 85% of applications to lift NRPF conditions.⁷
6. The Earned Settlement model will introduce excessive penalties for people who successfully apply to have their NRPF condition lifted due to destitution, effectively penalising people for the poverty they experience as a consequence of the immigration system. Longer settlement routes, which would lengthen the time migrants and their children are subject to the NRPF condition, will deepen widespread migrant destitution, exposing families to long-term hardship.

Impact on migrant victims

7. By restricting people from vital safeguards against poverty, the NRPF condition also makes migrant women much more vulnerable to gender-based violence and exploitation. Research shows that women with NRPF are three times more likely than the UK average to experience domestic violence.⁸ The financial dependency created by the NRPF condition is directly weaponised by perpetrators, who use the threat of homelessness, destitution, or becoming undocumented as a form of coercive control.

⁴ Johnson-Hunter. 2025

⁵ 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>

⁶ Praxis. 2024.

⁷ 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>

⁸ Woolley. 2019.

8. This is exacerbated by the high rates of financial abuse experienced by women with insecure immigration status.⁹ 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 force more migrant survivors to choose between destitution and living with perpetrators, increasing their exposure to harm and abuse.
9. This will particularly harm women who are not eligible for the Domestic Violence Indefinite Leave to Remain (DVILR) settlement route, or the Migrant Victims of Domestic Abuse Concession (MVDAC).¹⁰ The MVDAC/DVILR model is only open to a limited group of migrant victims on partner/spouse visas. Those who are not eligible, including victims on student and worker visas, must prove destitution to be granted public funds and access mainstream domestic violence refuges. Under the proposed settlement changes, the migrant survivors we support to have their NRPF condition lifted would be penalised with a longer settlement route.
10. Making permanent status harder to access will directly deter women from leaving perpetrators. Many of the migrant victims whom we support have expressed they won't feel safe enough to report abuse until they have permanent immigration status. Prolonging this, and actively penalising women for the consequences of abuse by

⁹ 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 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, 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).

¹⁰ 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.

lengthening settlement timelines, will allow perpetrators to enact long-term abuse with impunity.

11. This stands in stark opposition to the aims of the Government's recently published VAWG strategy, and the commitment to pursue perpetrators and support victims in a holistic, trauma-informed manner.¹¹ Unless migrant victims of gender-based violence across all visa types are fully exempt from the proposed changes, the new model will further entrench a two-tier system of justice and safety.

Alejandra's story

Alejandra* is from Latin America and lives in the UK. She has experienced physical, emotional and financial abuse from her husband, who is also her employer. Alejandra's husband prevents her from working independently and her income goes to an account which he controls. Alejandra is completely financially dependent on her husband. He does not allow her to leave the house without his permission and monitors her devices.

When Alejandra told her husband that she wanted to end the relationship, he cancelled her bank card to prevent her from leaving. Alejandra contacted LAWRS for support in accessing immigration advice in order to leave the relationship safely, but she is reluctant to leave yet. She is worried that if she reports the abuse before she is granted settlement, she will lose her job or her immigration status.

"[Alejandra] doesn't feel safe to leave him before the settled status [is granted] as she is totally dependent on him." - LAWRS caseworker

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

Demand on services

12. A key aim of the Earned Settlement model is to 'reduce pressure on public services.'¹² However, increasing the number of people on temporary visas and delaying access to public funds is likely to have the opposite effect.

¹¹ Home Office. (18th December 2025). Freedom from violence and abuse: a cross-government strategy. Online: <https://www.gov.uk/government/publications/freedom-from-violence-and-abuse-a-cross-government-strategy>

¹² 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>

13. Excluded from mainstream benefits, our service users with NRPF rely on foodbanks, short-term crisis payments from voluntary organisations, or support from children’s social services, who have a statutory duty to protect destitute migrant children in need. The cost to local authorities of supporting destitute migrants has increased by 130%, and is currently estimated at between £80 and £102 million per year.¹³ 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’.¹⁴
14. The immigration system obscures the real costs of central government decisions. 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 represent a reduction in public expenditure—the costs are simply pushed onto local authorities and the voluntary sector.¹⁵ 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, undermining the very aims of the Earned Settlement model.

In the light of previous errors and failings (such as the Windrush scandal), is the Home Office capable of implementing policy changes? Should responsibility for immigration, nationality and citizenship remain with the Home Office and, if not, where should it rest?

15. We are deeply concerned that the implementation of the Earned Settlement Model, and the wider changes set out by the Immigration White Paper, represent a continuation of the institutional failings which caused the Windrush scandal. The proposals represent significant risks of long-term harm and discrimination for certain migrant groups, including Latin Americans, migrant victims of VAWG and exploitation, people living in poverty, unpaid carers and people with disabilities or long-term health conditions. They also threaten the sustainability of the *by and for* sector as a whole, yet the Home Office appears to have given little consideration to these adverse impacts.

¹³ APPG on Migration & APPG on Poverty. 2024; 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>

¹⁴ Woolley. 2019.

¹⁵ APPG on Migration & APPG on Poverty. 2024.

Failure to consider impacts on migrant communities

16. We are gravely concerned that no consideration has been given to the impacts on migrant communities. This oversight has been raised by the House of Lords Secondary Legislation Scrutiny Committee, which has repeatedly criticised the Home Office’s failure to consult with those affected before making changes to immigration policy (such as the Skilled Worker visa changes in July 2025), and the lack of impact assessments for these changes. Lord Watson of Invergowrie, the Committee Chair, highlighted that “the Home Office has again failed to provide adequate supporting information on the effect of these changes”, in contravention of established good practice.¹⁶
17. The proposals have already caused substantial distress within migrant communities. Implementation remains unclear and is expected to unfairly affect those on existing settlement routes. Since the publication of the Immigration White Paper, LAWRS and other Latin American organisations have had an increase in phone calls from service users who are deeply concerned about the implications of the announcements. Vulnerable people who were lawfully granted access to public funds have also contacted the Home Office to cancel their benefits, as they fear negative retrospective impacts for their settlement routes.¹⁷ This indicates a profoundly dangerous effect, whereby survivors are deterred from exercising lawful entitlements essential to their safety and sustenance, due to fear of future immigration consequences that could hinder their eligibility to remain in the country.
18. As a *by and for* organisation, it is also important to highlight the impact these proposals are having on the wellbeing and morale of our frontline staff and volunteers, many of whom will be personally affected by the changes. We are also concerned about the sustainability of the *by and for* sector as a whole. Already, the July 2025 Skilled Worker Visa changes made it significantly more difficult to sponsor migrant workers for frontline roles in the sector, such as Independent Domestic Violence Advocates or Caseworkers¹⁸.

¹⁶ 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/>

¹⁷ Diane Taylor. (29th November 2025). “UK immigration status fears prompt carer to cancel benefits she is entitled to.” *The Guardian*. Online: <https://www.theguardian.com/uk-news/2025/nov/29/immigration-status-fears-carer-cancel-disability-living-allowance-benefit>

¹⁸ In July 2025, the general salary threshold for Skilled Worker visas increased to £41,700 for new applicants. The salary range for most VAWG sector roles falls below this threshold. For instance, Independent Domestic Violence Advocate (IDVA) roles are typically advertised between £24,000 and £33,000 per year. For more information, see: https://www.glassdoor.co.uk/Salaries/idva-salary-SRCH_KO0,4.htm

The impact of these changes on recruitment in the charity sector was again raised by the Secondary Legislation Scrutiny Committee, which criticised the Home Office’s failure to adequately consider this in their belated impact assessment.¹⁹ The *by and for* sector stands to lose the specialism and lived experience that forms the backbone of the services we provide to marginalised and migrant communities, a risk that has been overlooked in the design and assessment—a serious consequence that jeopardises the safety and support available to these communities.

19. We are also concerned that the impact on migrants will be compounded by the track record of poor Home Office decision-making. Many of our service users, including victims of VAWG, trafficking and exploitation, receive incorrect or unfair decisions from the Home Office which have to be challenged with specialist advocacy and legal support. Introducing a vastly more complex set of immigration rules will only increase the risk of poor-decision making and the backlog of decisions, all of which contribute to making migrant women vulnerable to becoming undocumented. Amidst this uncertainty, limited access to legal advice will fuel misinformation, fraud, and vulnerability to unscrupulous advice for migrant women. Despite this, no measures have been announced to facilitate access to legal advice or improve the quality of Home Office decision-making. Without safe and equal access to protection, legal support and justice for all victims, irrespective of immigration status, the Government’s commitment to halving VAWG within a decade is unachievable.

Inequalities and discrimination

20. The proposed settlement requirements risk exacerbating existing gender, racial and socioeconomic inequalities, yet the potential for disproportionate impacts and discrimination has been ignored.
21. The 10-year route already disproportionately affects people from certain ethnic backgrounds and nationalities, women and those on low-incomes. Most people on this route work in low-paid, essential sectors such as care work and cleaning, in which Latin American, Black and minoritised migrant women are over-represented.²⁰ Under the Earned Settlement model, these workers are directly targeted for longer settlement

¹⁹ Electronic Immigration Network. (11th November 2025). “Lords committee criticises poor explanations and missing information in October’s immigration rule changes.” Online: <https://www.ein.org.uk/news/lords-committee-criticises-poor-explanations-and-missing-information-octobers-immigration-rule>

²⁰ 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>

routes, forcing them to pay extortionate visa costs for longer. Many Latin Americans, who experience structural economic marginalisation, may never qualify for settlement if they cannot earn enough. Given that women are also more likely to undertake unpaid caring responsibilities, and are disproportionately impacted by the NRPF condition, the proposals are also set to systematically disadvantage women.

22. Despite framing the Earned Settlement model as a ‘fairer pathway to settlement’, we can see no consideration from the Home Office of the model’s potential to drive discrimination and disadvantage specific groups. It is vital for the Government to conduct a thorough, independent impact and equalities assessment before implementing any of these proposals. Failure to do so would risk repeating the systemic failures that led to the Windrush Scandal.

Lack of evidence for proposals

23. Adding to our concern about the failure to consider the impact on migrants, we wish to highlight that the proposals are not sufficiently evidence-based. In some cases, the evidence presented by the Home Office to justify its immigration changes has been openly misleading.
24. For example, in its November 2025 revision of modern slavery protections, the Home Office stated that: *“more than 2 in 5 people detained for removal between January 2022 and September 2022, were referred as potential victims of modern slavery. Repeated or late presentation of information, which leads to referrals into the system, can significantly increase the time taken to remove individuals with no right to remain in the UK.”*²¹ This implies that the National Referral Mechanism (NRM) is being abused through false claims intended to delay removal, an allegation repeated by the Home Secretary herself when stating that potential victims of exploitation make “vexatious”, last-minute claims of modern slavery.²²
25. Not only does this misrepresent how the NRM functions (referrals can only be made by designated First Responder Organisations), the Government’s own data makes clear that during this period, almost all (93%) of people referred into the NRM from immigration

²¹ Home Office. (21st November 2025). *Restoring Order and Control: A statement on the government’s asylum and returns policy*. Online: <https://www.gov.uk/government/publications/asylum-and-returns-policy-statement/restoring-order-and-control-a-statement-on-the-governments-asylum-and-returns-policy>

²² Diane Taylor. (18th September 2025). “UK anti-slavery commissioner condemns Shabana Mahmood’s asylum comments.” *The Guardian*. Online: <https://www.theguardian.com/politics/2025/sep/18/uk-anti-slavery-commissioner-condemns-shabana-mahmoods-asylum-comments>

detention received positive reasonable grounds decisions.²³ With the decisions being made by the Home Office themselves, this directly contradicts the narrative that large numbers of people are making false claims. We are deeply troubled by the Home Office's misleading presentation of data to justify curtailing the rights of victims of modern slavery and exploitation. As far-right hostility and violence towards migrants becomes increasingly normalised, it is irresponsible to promote misinformation and embed harmful narratives about migrants in policy-making.

Need for meaningful engagement with stakeholders

26. Whilst we welcome the opportunity to respond to the Government's Earned Settlement consultation and will be submitting evidence on the harm the model poses to migrant women, we are deeply concerned that the Government has already decided on a policy direction and will be seeking to implement its proposals regardless of the evidence submitted or the consultation outcome. This Home Office culture, and 'the pressure to develop and implement hostile environment policy quickly' without due diligence, was explicitly criticised in the *Windrush Lessons Learned Review* as a contributing factor to the Windrush scandal.²⁴
27. Alongside a thorough and transparent analysis of the consultation responses, it is critical for the Home Office to learn from the Windrush scandal and meaningfully engage with specialist *by and for* organisations before any more changes are implemented, to ensure that migrant women are not put at further risk of harm, and to address the significant potential for discrimination.

Is the process of applying for Indefinite Leave to Remain (ILR) and Citizenship too complex, or is complexity unavoidable?

28. Complexity is not unavoidable. It has been built into the system by design as part of the 'hostile environment', and as a natural consequence of frequent and often contradictory revisions to the Immigration Rules. This was acknowledged by the independent *Windrush Lessons Learned Review*, which recommended a reduction in 'the complexity

²³ IOM. (17th December 2025). "Modern Slavery in the UK, announced policy changes risk leaving victims behind." Online:

<https://unitedkingdom.iom.int/news/modern-slavery-uk-announced-policy-changes-risk-leaving-victims-behind>

²⁴ Wendy Williams. (March 2020). Windrush Lessons Learned Review. Online:

https://assets.publishing.service.gov.uk/media/5e74984fd3bf7f4684279faa/6.5577_HO_Windrush_Lessons_Learned_Review_WEB_v2.pdf

of immigration and nationality law, immigration rules and guidance'.²⁵ The Home Office's decision to introduce substantially more complex rules through the Earned Settlement model shows a failure to learn from the Windrush scandal, and will likely put migrants at increased risk of destitution, debt and becoming wrongfully undocumented.

29. The complexity of the UK's immigration system makes people completely reliant on specialist legal advice to understand their rights and options for settlement, and without this, they risk falling into irregularity. With legal aid being available for a very limited type of immigration cases (such as asylum and applications by victims of trafficking), many migrant women take on additional debt to pay for private advice, adding to the extortionate costs faced.²⁶ We also regularly see women falling victim to unqualified, unscrupulous legal advice providers, or non-legal professionals who give immigration advice.
30. For migrant survivors of domestic violence, abuse and exploitation, complex rules and inaccessibility of legal advice act as a barrier to justice and safety. *By and for* organisations like LAWRS provide free advice and advocacy to support migrant women, but demand far outstrips capacity. The proposed Earned Settlement model will drastically increase the complexity of these rules, and the consequences of falling foul of them.
31. Increased complexity and application volumes are also likely to cause more incorrect or delayed Home Office decisions, risking people becoming undocumented or wrongly denied settlement without means to challenge decisions. 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.

What are the total costs and requirements of applying for ILR and citizenship, and how do they compare with other countries?

32. The UK's immigration system is immensely expensive for applicants on settlement routes. Visa renewals and settlement fees are excessive, both in comparison to other countries and to the processing cost of each application. Economic hardship, debt and

²⁵ Williams. 2020.

²⁶ 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>

destitution linked to the immigration system will be amplified by the Earned Settlement proposals, with direct and disproportionate impacts for the most marginalised.

Visa and IHS costs

33. By the time people become eligible for settlement in the current system, they have already paid thousands of pounds in visa fees. The financial burden of these repeated visa costs on the 10-year route has been found to directly drive food insecurity and poor mental and physical health, making it exceptionally difficult to escape poverty.²⁷
34. The compulsory Immigration Health Surcharge (IHS), paid alongside application costs in advance, dramatically increases the amount that migrants pay when compared to other countries. For example, for a 4-year visa, a researcher would pay £791.20 upfront in Denmark, £281.27 in France, and £4,906 in the UK.²⁸ In fact, the UK's upfront visa costs are nine times higher than the international average, or 22 times higher when the UK figure is excluded from the sample.²⁹
35. The IHS was originally set at £200 per year when established in 2015, and has increased to £1,035 per year as of 2025, generating £6.9 billion in gross revenue since its introduction.³⁰ The Government has justified the surcharge by arguing that it covers the cost of providing healthcare to migrants, despite the fact that many migrants pay for healthcare twice, as they are also contributing to the National Health Service (NHS) via general taxation and National Insurance Contributions. These costs are deeply unfair and push migrants into poverty and precarity. 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 and prevent becoming undocumented.
36. The Earned Settlement model proposes lengthening settlement routes to reduce the perceived financial burden of migration on public services and the healthcare system, yet it appears that no analysis or acknowledgement of the significant (and comparatively

²⁷ Praxis. 2024.

²⁸ Denmark - Residence permit for researchers costs 6,810 DDK/791.2 GBP. See: <https://www.nyidanmark.dk/en-GB/You-want-to-apply/Work/Researcher>; France - VLS-TS entry visa (99 EUR/85.94 GBP) plus Researcher 'Talent Passport' (225 EUR/195.33 GBP) costs approximately 324 EUR, or £281.27. See: <https://www.welcometofrance.com/en/fiche/talent-passport-qualified-employee>; UK - Global Talent Visa application fee (£766) plus 4 year IHS (£1035 x 4 = £4,140) costs £4906. See: <https://www.gov.uk/global-talent>

²⁹ The Royal Society. (2025). UK immigration costs: an international comparison of skilled worker, researcher and student visas in 2025. Online: <https://royalsociety.org/-/media/policy/publications/2025/summary-of-visa-costs-analysis-2025.pdf>

³⁰ House of Commons Library. (13th August 2024). The immigration health surcharge. Online: <https://commonslibrary.parliament.uk/research-briefings/cbp-7274/>

excessive) contribution made by migrants on settlement routes has been made. Instead, the proposals are set to amplify and extend the widespread economic hardship faced by migrants on settlement routes before they qualify for Indefinite Leave to Remain (ILR).

Settlement costs

37. Alongside excessive and repeated visa costs, qualification for settlement is not 'automatic', as characterised by the Home Secretary. At this stage, migrants are again charged comparatively expensive upfront fees to submit an ILR application. In addition to this, the complexity of the immigration rules forces many people to also pay administrative and legal fees to support a successful application, adding to the prohibitive financial costs.
38. Both the UN and EU call on states to ensure that residence fees are not 'disproportionate or excessive', and remain linked to the actual cost of processing.³¹ However, ILR applications in the UK are charged at far higher than the actual processing cost. In Autumn 2023, an ILR application cost £2,404 to submit, but only £491 to process, representing a 489% profit margin for the Home Office.³² According to the most recent transparency data, as of November 2025, the application cost £3,029 to submit and £523 to process. This means that over two years, the cost of processing the ILR application has increased by 6.5%, yet the cost to the applicant has increased by 25.9%, now representing a 579% profit margin for the Home Office.³³
39. The UK's settlement costs have tripled over a decade, and are now 336% higher than average permanent residence costs across the rest of Europe.³⁴ 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.³⁵ Lengthening settlement routes would force migrants to pay these visa costs for longer, making it significantly harder for people to afford their ILR applications once they do become eligible.

³¹ PICUM. (2023). The Use of Fees in Residence Procedures in Europe: Pricing people out of a residence permit? Online: https://picum.org/wp-content/uploads/2023/08/The-use-of-fees-in-residence-procedures-in-Europe_Pricing-people-out-of-a-residence-permit.pdf

³² PICUM. 2023.

³³ Home Office. Visa fees transparency data. Online: <https://www.gov.uk/government/publications/visa-fees-transparency-data>

³⁴ The Royal Society. 2025; PICUM. (2023).

³⁵ APPG on Migration & APPG on Poverty. 2024.

40. Reducing the cost of settlement fees would make them fairer and bring the UK in line with other countries. It would also help reduce a barrier to accessing stability and justice. For migrant survivors, these costs are not only prohibitive to accessing settlement, they also prevent women fleeing violence, abuse and exploitation, trapping them in long-term harm. The concessions that exist are often inaccessible in practice: often women require specialist legal support to submit fee waivers and many victims are ineligible for these protections.

Leonor's story

Leonor* is from Latin America. She moved to the UK on a spouse visa and has No Recourse to Public Funds (NRPF). Leonor's husband subjected her to domestic violence, including physical, emotional and financial abuse. He used her dependent visa as a form of coercive control, threatening to revoke it if she reported him to the police. Leonor disclosed that the cost of visa applications was also a trigger for physical violence during the relationship.

After fleeing the abuse, Leonor was advised by a private solicitor to apply for the MVDAC. She applied successfully on her own, but was not given any explanation of her options for settlement. Leonor is worried as the MVDAC expires in three months. She cannot afford the private solicitor fees to make her DVILR application and is considered ineligible for Legal Aid as she earns too much, despite being £5000 in debt following financial abuse.

LAWRS found a solicitor willing to provide Leonor with advice and support to make the DVILR application, and a payment plan was agreed. Despite having temporary access to Universal Credit through the MVDAC, the legal fee installments meant Leonor was struggling to afford essentials and had to be supported with food vouchers.

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

Under the Immigration White Paper's expansion of the points-based system, what will happen to those who never 'earn' enough points to achieve ILR or citizenship?

41. We are gravely concerned that the Earned Settlement model will create a cohort of migrants who can never meet the settlement requirements, owing to their existing

marginalisation. A significant number of the migrant victims of VAWG, trafficking & modern slavery who we support would fall into this group. If they were indefinitely unable to qualify for settlement, it would become exceptionally difficult for these women to access safety and justice or rebuild their lives, and many would become trapped in long-term abuse and exploitation as a result.

Impact of new settlement requirements

42. The introduction of new settlement requirements poses a particular risk for our service users. 70% of Latin American migrants in the UK work in low-paid, precarious sectors such as cleaning and hospitality, despite the majority having tertiary/university qualifications. We are concerned that the structural barriers and economic marginalisation faced by Latin Americans in the UK will mean they are disproportionately impacted by these proposals, effectively locked out of settlement despite carrying out essential labour that is vital for communities to function, as recognised during the pandemic.
43. Many migrant women will also struggle to meet the 'Integration' requirement because of limited capacity to take on additional activities. We frequently support service users who are working long hours or balancing multiple part-time jobs to meet high visa fees, income thresholds and living costs. For many people on existing settlement routes, it is simply unrealistic and impossible to fit in additional activities like volunteering.
44. Stay-at-home parents and full-time unpaid carers will also be particularly at risk of never qualifying for settlement, especially where they are subject to NRPF. Unpaid carers provide indirect social and economic benefits at a societal level, by supporting the healthy development of children and encouraging long-term productivity, yet this inherent contribution is unacknowledged by the model. If settlement routes of dependents are separated from main applicants, unpaid carers will also be hugely disadvantaged.

Impact on migrant victims

45. The settlement requirements are fundamentally divorced from the realities of migrant survivors of VAWG, trafficking and exploitation. For instance, we often deal with cases where perpetrators have deliberately weaponised immigration status and English-knowledge to maintain their victims in a state of isolation and dependence. This includes preventing victims from taking English classes, preventing them from working

or applying for National Insurance numbers, or deliberately making victims undocumented.

46. Moreover, most of the women with insecure immigration status supported at LAWRS disclose experiencing financial and economic abuse, and may struggle to meet these requirements as a result. By excluding victims from ever qualifying for settlement, these proposals would punish victims for the abuse they have experienced, emboldening perpetrators and trapping women in long-term abuse and exploitation.
47. Likewise, the mandatory “clean criminal record” requirement will harm survivors of gender-based violence, exploitation and trafficking who have been criminalised as a result of their abuse, which is particularly concerning given the well-documented racial discrimination in the criminal justice system. Our frontline staff also increasingly deal with cases where perpetrators of VAWG make counter-allegations, resulting in arrests of migrant victims. In this context, we are gravely concerned that these proposals may now prevent victims from being able to apply for settlement, creating a further deterrent to reporting abuse and handing perpetrators a tool to enact long-term coercive control.
48. Making it harder for migrant women to access safety, stability and security will increase victims’ 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. If these proposals are implemented, it is vital that full exemptions apply for all migrant victims, particularly for those ineligible for the DVILR route.

Clarissa’s story

Clarissa* is from Latin America and moved to the UK to join her partner after the birth of their child. Clarissa wanted to apply for the partner visa whilst in her home country, as this would make her eligible for the 5-year ILR route. However, Clarissa’s partner forced her to apply from the UK, automatically placing her onto the 10-year settlement route.

Clarissa’s partner is psychologically and physically abusive. He monitors Clarissa’s phone, isolates her from friends, and does not allow her to have a key to their house, to prevent her from leaving. He tells Clarissa that because she can’t speak English, she has no rights in the UK.

When Clarissa started learning English to try and gain some independence from her partner, the abuse escalated further. The perpetrator is now threatening to make Clarissa homeless and take custody of their child. Clarissa was found to be at high-risk of serious harm or homicide by her VAWG caseworker. She disclosed feeling trapped with her partner.

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

Consequences of never reaching settlement

49. The 'Earned Settlement' model will paradoxically prevent large numbers of people from integrating in the UK, contradicting its stated aim. 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.
50. Secure settlement improves employment rates, job mobility and earnings, reducing people's exposure to unemployment, under-employment and exploitation.³⁶ Settlement is therefore vital to economic integration, and restricting access will hinder participation in the labour market and wider society. At a societal level, making settlement more difficult to access will contribute to rising destitution and financial hardship, threatening the Government's ability to meet key policy objectives such as ending homelessness and reducing child poverty.³⁷
51. This will also undermine social integration and community participation for migrants. Cycles of debt, poverty and housing insecurity whilst on settlement routes make it extremely difficult for families to engage in community life.³⁸ 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.

³⁶ 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>

³⁷ APPG on Migration & APPG on Poverty. 2024.

³⁸ The Children's Society. (May 2020). A Lifeline for All: Children and Families with No Recourse to Public Funds. Online: <https://www.childrensociety.org.uk/sites/default/files/2020-11/a-lifeline-for-all-report.pdf>