

Unsafe, insecure: barriers to safe housing for Black and minoritised migrant women and their children

Policy briefing – October 2024

About Hibiscus Initiatives

[Hibiscus Initiatives](#) ('Hibiscus') is a national charity which has been delivering services to Black and minoritised migrant women in contact with the criminal justice system and immigration system for over thirty years. We provide holistic, practical and emotional support to women in prison, immigration detention and the community, with an expanding policy team. We work through a wrap-around, trauma-informed, women-centred and rights-based support model, centring anti-racist practice, including through group activities at our specialist Women's Centre. Many of Hibiscus' service users are victim/survivors of trafficking and violence against women and girls (VAWG).

About this briefing

This briefing is intended to inform implementation of reforms in law, policy and practice to overcome barriers to safe housing for Black and minoritised migrant women and their children. The accompanying evidence report draws on focus groups with Hibiscus' frontline practitioners and service users, data from our casework and desk-based research.

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Background

In addition to the challenges faced by the wider community amid a crisis in housing and the cost of living, migrant women are severely impacted by the 'hostile environment' policy. This prevents those with insecure immigration status from working, renting, accessing health services and claiming benefits. Black and minoritised migrant women are also subject to stigma and racism, and structural barriers. This is linked to other barriers which combine to create severe challenges for many migrant women trying to access safe and secure housing.

There are of course significant barriers to safe and suitable housing for men and women with British citizenship, as well as migrants. For British citizens, the housing crisis stems from a lack of affordable, decent quality housing and the cost of living crisis. For migrants, additional structural barriers to housing are embedded in the state's restriction of their rights, putting them on a path to detention, ill-equipped asylum accommodation and risk of homelessness.

For migrant women, who are more likely than men to have experienced or be at risk of experiencing abuse and exploitation, and more likely to be the sole carers of dependent children, a gender-specific, trauma-informed and intersectional approach is required to improve outcomes.

Our research for this report, and our day-to-day experience as a specialist, frontline women-only service, makes clear that migrant women subject to marginalisation are a neglected group that, when they are considered at all, are thought of as a problem that is too difficult to solve. Worse than this, whereas political leadership is needed to champion their rights and ensure their protection from destitution, abuse and exploitation, instead migrant women find themselves the victims of deliberate policies to create a 'hostile environment' for migrants, scapegoated for societal problems over which they have no control. Government rhetoric about commitments to tackling VAWG, and about achieving racial equality and gender equality, rings hollow to these women and those who support them.

Five barriers to safe housing for Black and minoritised migrant women

Informed by insights from Hibiscus' frontline practitioners and service users, we have identified five key barriers which combine to make Black and minoritised migrant women, and their children, particularly vulnerable to unsafe and insecure housing and the significant harms associated with this:

- 1. The 'hostile environment' policy** and associated structural, legal and procedural barriers block mainstream housing routes for migrant women and their children, and increase stigma and discrimination.
- 2. The reliance on poor quality, shared accommodation** for migrants, instead of decent, self-contained, family-friendly social housing in communities, causes harm to health and re-traumatisation to migrant women and their children.
- 3. The failure to adopt a gender-informed, trauma-responsive and intersectional approach** to migrant women's accommodation provision and the housing application process causes harm to migrant women and their children.
- 4. The failure to address links between imprisonment or immigration detention and housing problems** can increase the risk of imprisonment and the risk of homelessness for migrant women and lead to separation of families.
- 5. The failure to collect and publish data** about housing outcomes for migrant women and their children hampers progress.

For many migrant women, the inability to access safe and secure housing compounds existing mental health needs and other challenges arising from past experience of trauma and ongoing exposure to the risk of abuse, exploitation and criminalisation.

What Black and minoritised migrant women are experiencing on the ground

Overview

Where race, migrant status and gender intersect, women are impacted in particular ways by systemic and institutional discrimination. The women Hibiscus supports are also affected by the ways in which the criminal justice and immigration systems interact with each other. Many are not permitted to work; many have no access to public funds. Some are living in destitution, while others are struggling in unsafe or unsuitable accommodation, often with dependent children.

Many of these women are experiencing multiple and complex needs due to past trauma including human trafficking, domestic servitude, domestic abuse and other forms of VAWG which is compounded by the failure of statutory services to safeguard them. These women's recovery is hindered, and they are often also re-traumatised, by contact with the immigration and criminal justice systems and associated problems including homelessness, poverty and debt; exposure to further harm, VAWG and exploitation; stigma, communication and cultural barriers; and discriminatory treatment.

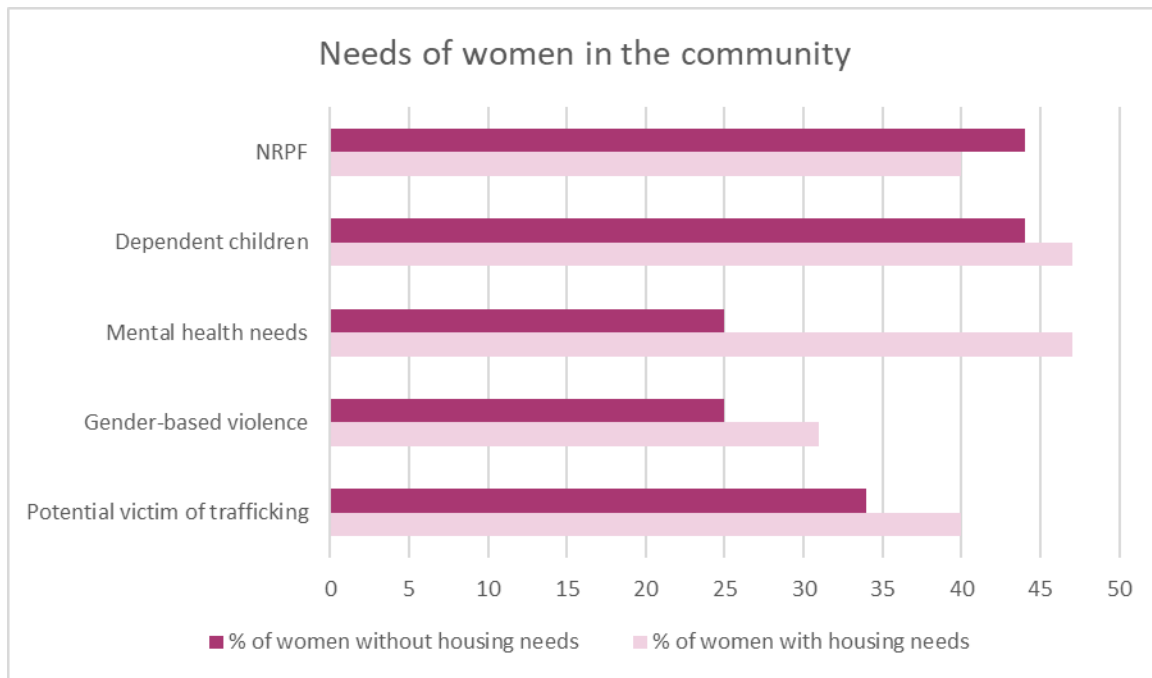
Many women Hibiscus works with are in temporary, shared accommodation, which is unsuitable for women in recovery from trauma and for families. For families with children, frequent moves and long distances from school are traumatic and disruptive. Migrant women released from prison and immigration detention are at significant risk of homelessness, and lack of housing can in turn lead to detention for longer periods.

Home Office accommodation for asylum seeking women is frequently overcrowded and of poor quality. It can also be unsafe, and there are not enough spaces for women trafficking victims in safe houses. Women who receive refugee status find themselves evicted from Home Office accommodation at short notice, putting them at greater risk of homelessness, VAWG and exploitation, with detrimental impacts on their mental health. If they are lucky, they may be moved to temporary accommodation, and then face a long wait for social housing.

Our casework data

From April 2023 to March 2024, Hibiscus' project workers supported 960 women. Of these, 588 were supported in Immigration Removal Centres (IRCs), 178 were supported in the community, 41 were supported by our Courts Project and 153 were supported in prison.

Of the 178 women supported by Hibiscus in the community, 98 (55%) presented with housing needs. The table below compares the additional needs identified for those 98 women with those of the women without housing needs. Both groups of women had significant levels of need in relation to all the categories shown, and close to half of all the women had dependent children living with them. However, the women with housing needs were more likely also to have mental health needs (47% of those with housing needs, compared to 25% of those without) and to be survivors of VAWG (31% of those with housing needs compared to 25% of those without).



Our service users experience a range of problems with their housing, including:

- **No housing** – street homelessness or sofa surfing
- **Temporary housing**, subject to frequent moves at short notice, sometimes without seeing the property before agreeing to move
- **Shared housing** with inadequate space, privacy and facilities (including for families); not women-only
- **Poor quality housing** which is in disrepair (including damp, mould, dirt, infestations and strong smells)
- **Unsuitable housing** (due to physical or mental health needs and disabilities)
- **Overcrowding**
- **Unsafe location** - areas where service user feels unsafe or where the service user is at risk (e.g. returned to location where abuse/exploitation took place)
- **Distance from school** and support systems (such as specialist women's services, church and friends)
- **Inadequate move-on period** to leave Home Office-funded accommodation when women gain refugee status or discretionary leave to remain.

When applying for housing, women and practitioners face procedural barriers including:

- **Lack of trauma-informed, gender-informed and intersectional approaches** in application process and amongst onsite staff.
- **Inaccessible application process**, including complex legal and procedural framework, online application processes, 'gatekeeping' response and lack of access to legal aid solicitors.
- **Failure by state agencies to use available interpreting services**
- **Stigma, discrimination and institutional failings to accommodate different cultures.**

Adeela*

Adeela lived in NASS accommodation with her partner and their two children, who were in primary school. In August, they had been refused asylum but were granted permission to stay in the UK on the basis of their Article 8 (ECHR) right to family life.

Adeela immediately approached her local council to start a homelessness application, but they said that they would not be able to proceed until she received an eviction notice. Her asylum support provider was not able to provide documentation about her imminent eviction until it was formally confirmed by the Home Office.

Adeela's family was stuck in limbo: there was nothing she could do to prepare for their imminent eviction. In the meantime, Adeela's children had already started the school term. Adeela said:

"This has had a negative impact on my children. I've had to buy their uniforms, but I don't know when and where they will be transferred to once we're homeless. My son asks me how long he will be able to stay with his friends, but I just don't know."

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

What Black and minoritised migrant women need

Through this research, women supported by Hibiscus have identified the most basic requirements for them to feel safe in their accommodation, including not having to share facilities and not having to interact with onsite staff who are not trauma-informed – having a place to heal. Through our discussions with the women we support and our frontline team, we have identified the following essential requirements for migrant women's housing to be safe and suitable:

- **Privacy and security** – including affordability and access to self-contained, women-only accommodation (not shared with strangers).
- **Location in their community** – avoiding long distances from school and other essential services.
- **Decent physical conditions** – clean accommodation in good repair, not overcrowded, and particularly not damp.
- **Gender-informed, trauma-informed and intersectional** accommodation provision (including supported housing), including the process for accessing it.
- **Reasonable adjustments** to accommodate disability.
- **Meets Probation and Immigration requirements** – to avoid women being unnecessarily detained in prison or immigration detention due to a lack of suitable accommodation in the community.

As one woman explained:

"Not having somewhere safe [to live] is slowing my recovery – if you're constantly experiencing new trauma how can you deal with it as new ones keep coming up?"

Migrant women need to be able to navigate the housing application process, and they need their accommodation to be of decent quality and located within reasonable reach of essential services, including their children's schools. When they are moved on from Home Office accommodation, upon gaining refugee status, they need to be given enough time to find alternative accommodation.

Summary of recommendations

Instead of scapegoating migrant women and their children, the UK government and statutory agencies should instead join the many third sector organisations who take a lead in promoting their rights, and supporting them to flourish as part of a diverse society. In summary, we recommend that the UK government should end the ‘hostile environment’ policy and support migrant women into education, training and work; central and local government should invest in decent, self-contained social housing in communities that is accessible to migrant women and their children; and all agencies should take a gender-informed, trauma-responsive and intersectional approach to accommodation provision and the application process. This work must include addressing the links between imprisonment and immigration detention and homelessness, and collecting and publishing disaggregated data to measure progress in improving outcomes.

Recommendations in full

‘Hostile environment’ and other structural, legal and procedural barriers

1. **End the ‘hostile environment’ policy** and remove associated structural, legal and procedural barriers to safe and suitable housing for migrant women and their children.
 - 1.1 **Abolish the ‘hostile environment’** - Central government must:
 - (a) End the ‘hostile environment’ immigration policy, which is harmful and has no proven deterrent effect on so-called ‘illegal’ migration; and
 - (b) Repeal measures in the Illegal Migration Act 2023 and Nationality and Borders Act 2022 that have created barriers to migrants applying for asylum or receiving support as victims of trafficking.
 - 1.2 **Abolish the No Recourse to Public Funds (NRPF) condition and other restrictions** - The Home Office should abolish the harmful and ineffective NRPF condition and remove restrictions on asylum seekers’ right to work and right to rent.
 - 1.3 **Support migrant women to access education, training and employment** - Central and local government should adopt a strategic approach, informed by an economic analysis and working with women with lived experience and specialist ‘by and for’ services, to supporting migrant women to access education, training and employment. This should enable women to meet their needs and those of their dependants through employment where possible, instead of relying on welfare benefits and/or hyper-precarious work which can be exploitative.
 - 1.4 **Implement culture change** - Central government must seek to mitigate the ill effects of the ‘hostile environment’ immigration policy on attitudes to migrant women, and the culture of disbelief and lack of compassion shown towards them, by implementing training and systemic culture change to achieve a gender-informed, trauma-informed and intersectional approach to housing application processes and staffing at accommodation sites. This must include combating ‘gatekeeping’ responses by housing departments, ensuring routine use of interpreting services and implementing programmes in partnership with local women’s ‘by and for’ services to address stigma and discrimination, and ensure an intersectional approach.

- 1.5 Increase access to justice** - Central government and local government must work together to simplify the legal and procedural framework for housing applications, reduce reliance on online application processes particularly for migrants who are new to the country and/or for whom English is not their first language, and increase access to legal aid solicitors in relation to both immigration status and housing.
- 1.6 Learn from what has worked** - All agencies involved in supporting migrant women to access safe and suitable housing – including central and local government – should consider what can be learned from the response to the Covid-19 pandemic to achieve sustainable improvements in housing outcomes for this group, and share examples of good practice.

Poor quality, shared accommodation

- 2. End reliance on poor quality, shared accommodation** for migrants. Central and local government must invest instead in decent, self-contained, family-friendly social housing in communities that is accessible to migrant women and their children.
- 2.1 Increase benefits to match the cost of living** - The Department for Work and Pensions (DWP) should end the cap on household benefits and scrap the two-child benefit cap.
- 2.2 Invest in accommodation and support** - Central and local government must invest in accommodation provision and support that meets the needs of migrant women subject to marginalisation and their dependants, including survivors of modern slavery and human trafficking. This must include:
- (a) Working towards ending the use of shared accommodation and, in the meantime, ensuring any shared accommodation for women is women-only unless otherwise requested.
 - (b) Investment in suitable, self-contained social housing that is accessible to migrant women and their dependants in communities, taking a gender-informed and trauma-informed approach to meet the needs of women recovering from trauma (including victims of trafficking and VAWG), pregnant women and women with children, and aiming to avoid long periods being spent in local authority temporary accommodation with frequent moves.
 - (c) Investment in decent, self-contained, women-only refuge and safe house supported accommodation for victims of trafficking, that is not reliant on occupants having recourse to public funds. Abolishing the NRPF condition would assist by allowing occupants access to benefits and widening their access to existing provision.
 - (d) Improvements to the Modern Slavery Victim Care Contract to ensure it meets survivors' needs.
- 2.3 Extend 'move on' periods to prevent homelessness** - The Home Office must extend the 'move on' period for asylum seekers who gain refugee status or discretionary leave to remain to at least 56 days and improve communication between the Home Office and local authority housing providers to avoid gaps in accommodation.
- 2.4 Raise housing standards and strengthen rights** - Central and local government should work to raise standards in rented homes and strengthen housing rights. It

should ensure that accommodation provided to migrants, whether Home Office-funded or otherwise, is subject to the same regulation on minimum standards as other accommodation. This should include:

- (a) Permanently withdrawing the Houses in Multiple Occupation (Asylum-Seeker Accommodation) (England) Regulations 2023 and ensuring asylum seekers' accommodation is subject to the same regulatory framework as all other accommodation, including through extension of Awaab's Law to asylum seekers' accommodation;
- (b) Ensuring accommodation providers meet legal requirements including under equality legislation; and
- (c) Strengthening monitoring and accountability mechanisms, and resourcing implementation, to ensure the provision of suitable accommodation for migrant women and their families.

Gender-informed, trauma-responsive, intersectional approach

3. Adopt a gender-informed, trauma-responsive and intersectional approach to migrant women's accommodation provision and the housing application process.

3.1 Implement training and guidance for housing professionals - Central and local government should work with women with lived experience and specialist organisations to co-design and co-deliver training and guidance for those supporting migrant women and their families, and for local authority housing and social care teams, to ensure a gender-informed, trauma-informed and intersectional approach that respects the rights and meets the needs of migrant women and their dependants.

Accommodation post-release from prison or immigration detention

4. Address links between imprisonment or immigration detention and housing problems for migrant women and their children.

4.1 Implement a cross-government approach - The Ministry of Justice, Home Office, DWP and Ministry of Housing, Communities and Local Government must work together to ensure that lack of safe and suitable accommodation is never a reason for migrant women being remanded in custody, being held in prison beyond sentence, or being held in immigration detention, and that no migrant woman leaves prison or immigration detention to homelessness.

4.2 Proactive approach by Home Office and local government - Local authorities (and the Home Office where applicable) should take a proactive approach to applications for housing and homelessness help from migrant women in prison or immigration detention, including conducting pre-release assessments as a matter of routine.

Data gap

5. Collect and publish data about housing outcomes for migrant women and their children to build the evidence base, encourage reform and measure progress.

5.1 Improve data collection and analysis - Central government must work with local authorities effectively to collect and analyse data on housing needs and outcomes for

migrant women and their dependants, including those leaving prison or immigration detention, and publish this information regularly to build the evidence base, encourage work to improve outcomes and measure progress.

Conclusion

Overcoming the barriers to safe and secure housing for migrant women and their children requires an intersectional, gender-specific and trauma-informed approach. This will need to involve close work by all agencies with frontline women-only services, informed by meaningful engagement with Black and minoritised migrant women with lived experience.

Credits and acknowledgements

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