

Accommodation for women with No Recourse to Public Funds

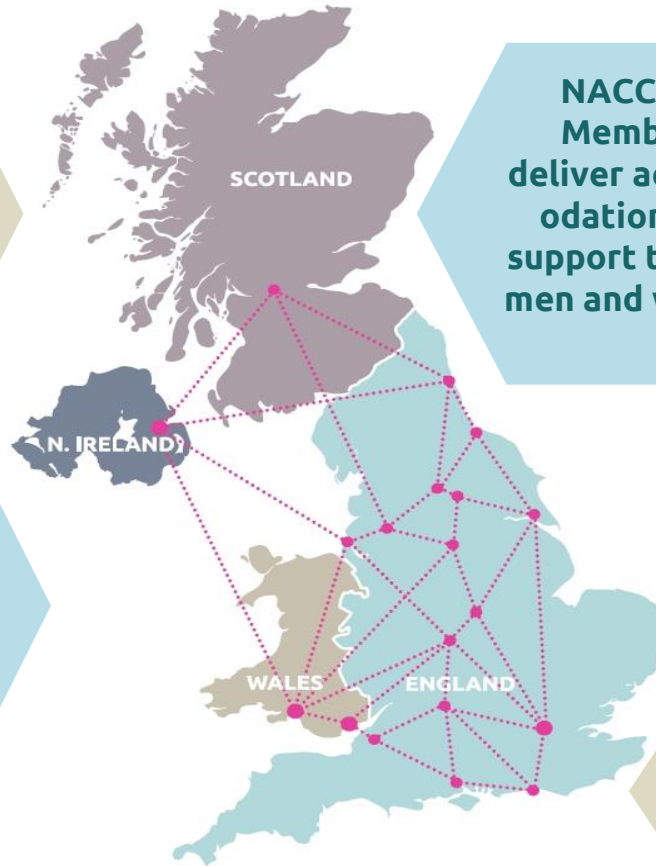
Hannah Gurnham, External Affairs Manager, NACCOM



What does NACCOM do...

NACCOM
A diverse
network of 140
frontline
member
organisations
across the UK

Our Vision:
For the UK to have a fair,
just and humane asylum
and immigration system,
which enables people
seeking asylum, refugees
and other migrants with
NRPF to be free from
destitution and to live
with dignity and agency.



NACCOM
Members
deliver accomm
odation and
support to both
men and women

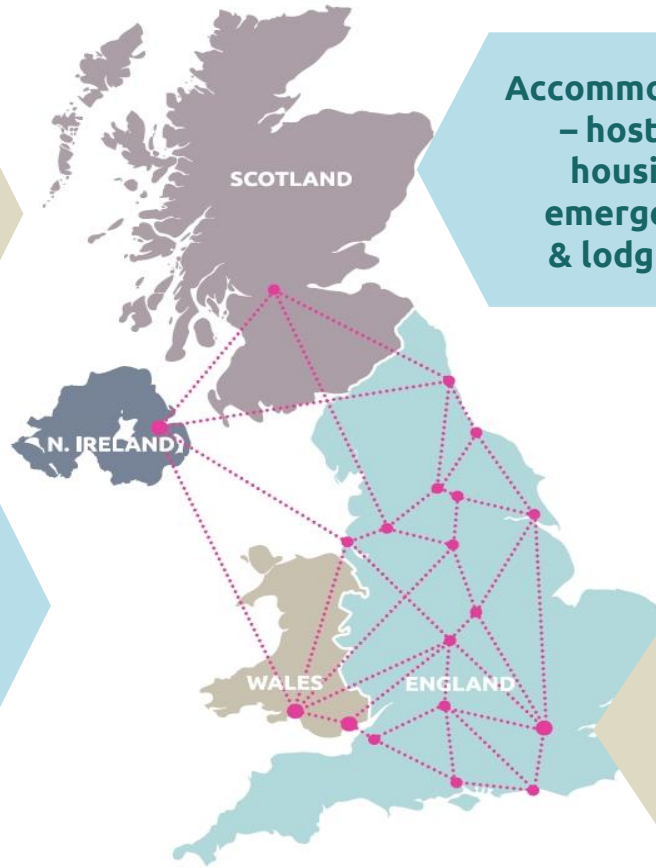
Our Mission:
To promote best
practice in and support
the establishment
of accommodation
projects that reduce
destitution amongst
people seeking
asylum, refugees and
migrants with no
recourse to public
funds.

Services:
Network
Development,
Policy,
Research,
Advocacy

What do NACCOM members provide...

Broad range of services, including...

- Holistic support services, including;**
- immigration advice and casework
 - trauma-informed services
 - financial support
 - employment support
 - Social activities



Accommodation
- hosting,
housing,
emergency,
& lodgings.

Members work in partnership with a range of national and local partners, incl;

- Local Authorities
- Housing Associations

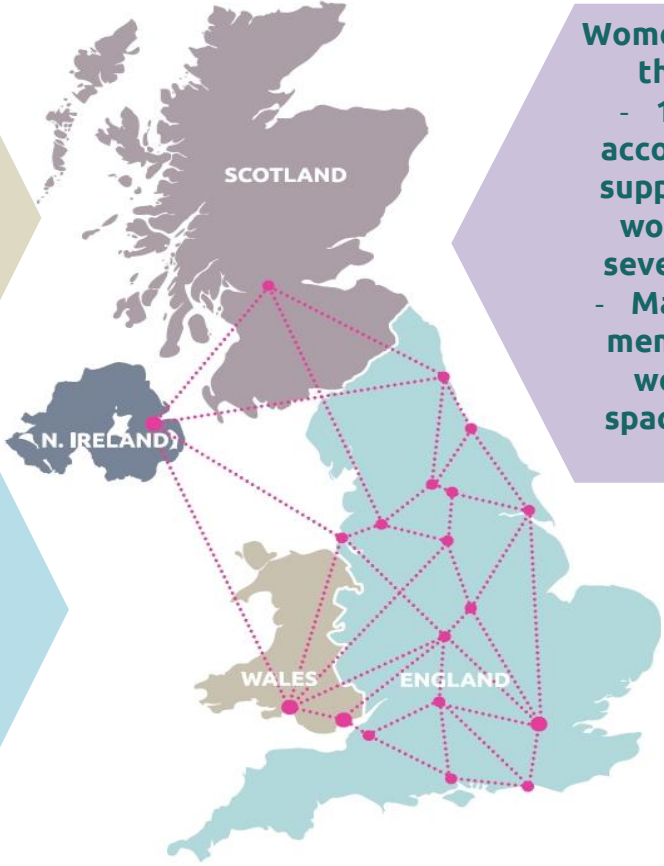
Services for specific groups;

- Women
- LGBTQIA+
- Survivors of modern slavery and trafficking

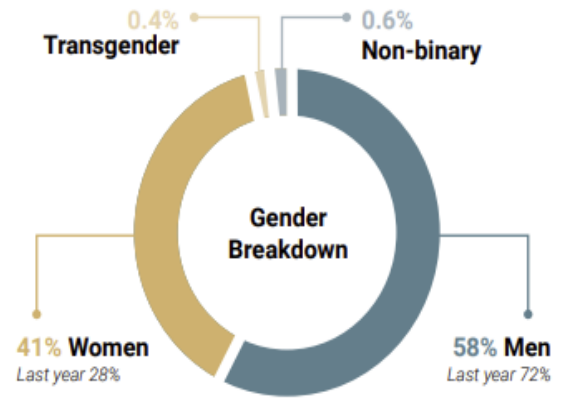
Who do NACCOM members support....

Last year (2022 – 2023) across our membership...

NACCOM members accommodated;
 -3,724 people (63% more than last year)
 - of whom 974 had NRPF
 - 1526 women (41% women (last year 28%))



Women's services in the network;
 - 10 dedicated accommodation and support projects for women (including several 'by and for')
 - Many additional members providing women-centred spaces and services



NRPF – what is it?

- Most people who migrate to the UK are excluded from accessing public funds
- Product of **'hostile environment'** - destitution by design
- Prevents people from accessing most mainstream benefits; welfare, income allowance and housing/homelessness assistance
 - impacts **'documented' migrants** who have a valid limited leave to enter or remain. Many have built lives here for many years.
 - Also impacts people who have been **refused asylum** and those who are **'undocumented'**, who are subject to NRPF by default.
 - People can apply to have their conditions lifted (not straightforward)

How many people are impacted by NRPF?

- Exact figures are hard to come by – lack of robust Gov't data
- Estimated that **about 2.6 million people** in the UK have NRPF
- In 2021/22, 142 UK local authorities reported providing support to 10,640 destitute migrant people, at a reported cost of £55m (COMPAS)
 - Approximately **624,000 people have insecure immigration status and have NRPF by default** (but this is hard to track)
 - Illegal Migration Act will extend NRPF to additional groups – those who are deemed **'inadmissible'** - around **115,000 people** by the end of 2024 (Refugee Council)

Impact of NRPF

"It's very hard, because Home Office they don't care. Once they reject you they don't care, they don't bother how you live where you eat, no support. Nothing."

NACCOM Refused? report 2023

- No access to the mainstream welfare safety net and are therefore at greater **risk of destitution, homelessness and exploitation**
- NRPF **traps people/families into cycles of poverty**
- COVID-19 pandemic highlighted precarity of those with NRPF, particularly **when support systems fail** (eg employment, asylum support, relationship breakdown) - **'economically vulnerable households'**

Impact of NRPF on women

- **Women (and children) disproportionately impacted by NRPF**
- **"An estimated 85% of individuals applying to have the NRPF condition lifted were women, nearly all of whom were single mothers." *Unity Project report***
- **"Trapped from accessing free childcare services and employment, women can neither access state support nor earn money to support their child - NRPF 'indirectly discriminates' against women, who are statistically almost always likely to be worse impacted financially by a relationship breakdown than the father." - *Women's Budget Group***

Impact of NRPF on women

- **Pregnant women**; Higher financial needs/inability to work for a significant time - no exemption from the NRPF.
- **Undocumented pregnant women**; incl. trafficking and modern slavery survivors, barred from public funds
- Rely on a dysfunctional National Referral Mechanism (NRM) system (failed 752 victims between 2015-17 by refusing them financial aid, counselling and housing)
- **Migrant women more likely to be subject to domestic abuse** (Unity Project) - NRPF policy prevents access to vital domestic violence support services.

Housing pathways



- **Safe, stable housing** key to unlocking engagement with other services, including legal advice
- **Lack of affordable social housing/scarce supply of temporary housing**
- Not all non-UK nationals are excluded from 'public funds', or are excluded in the same way, and assumptions made by frontline services can often wrongfully **prevent people accessing their entitlements.**
- Government position; **local authorities can use their general powers of competence under the Localism Act 2011** to accommodate people regardless of eligibility for a limited period of time.
- **NACCOM working with national partners to call for change**

NACCOM network housing solutions



- **Stable, safe temporary accommodation – cornerstone;**
- **Hosting**
- **Cross-subsidy housing models**
- **Partnerships with Housing Associations and Local Authorities to deliver innovative accommodation models**
- **Emergency accommodation (hostels, night shelters)**
- **Lodgings**



Women-centred services



- Ten women-only services in the network
- Several 'by and for' women's services
- Other services with women only spaces/services

Why?

- Women often face unique barriers/needs based on particular experiences (trafficking, modern slavery, abuse, exploitation, pregnancy and birth, childcare, etc)
- Trust, safety, community, empowerment, understanding
- Trauma-informed approach
- Services – and housing - that speak to those needs are vital; mainstream services can't always provide what's needed
- Economic and fiscal argument; cost benefit to public services of having special women-centred services (Southall Black Sisters & partners)

Case study; Ubuntu, Glasgow

- 'By and for' feminist org
- Trauma-informed
- Service-users involved in shaping service delivery
- Employees former service users - 'experts by experience'
- Local community partnerships
- Empowerment is to resist the hostile environment
- Unconditional accommodation
- Open access (LGBTQI+)
- Therapy as support – hair care group, bringing women together in community, solidarity, nourishment and dignity

'We are the talk of the town': the refugee-led Glasgow charity helping women caught up in asylum system

Therapy, accommodation, haircare - Ubuntu offers destitute women practical help and advice, and an emotional lifeline



How members are working in partnership with HAs...



- Cross-subsidy model with accommodation leased from housing provider
- Free or peppercorn rent for void or 'gifted' properties
- Use of meanwhile premises
- 'Rent-free' bedspaces in local authority-commissioned accommodation
- Local authority provided or funded accommodation for public health purposes
- Accessibility of nomination rights to long-term housing or move on support



Thank you!



**OVERCOMING 'NO
RECOURSE TO PUBLIC
FUNDS'
&
SAFE HOUSING FOR
MIGRANT WOMEN**



Michaela Western
Hibiscus Initiatives

Hibiscus Initiatives

Hibiscus enables marginalised migrant women trapped in the immigration and criminal justice system to rebuild their lives.

Our theory of change:

- **Personal experience:** working with women in the community, courts, prisons and immigration detention
- **Practice:** working with institutions within the criminal justice and immigration systems as well as with stakeholders and other NGO partners, to help improve understanding, service provision and support to create fairer practices.
- **Policy:** working collaboratively with other organisations to campaign for policy change
Hibiscus will provide evidence and the voice of migrant women themselves to influence policy and practice.
- **Public opinion:** providing communication platforms for migrant women with lived experience of the criminal justice and immigration systems to be heard in the media. We will

Safe Housing for Migrant Women Project

Funded for three years by the **Oak Foundation, Jan 2023 – Dec 2025**, to expand Hibiscus' work to improve housing outcomes for migrant women:

- **Objective 1** - Empower migrant women with lived experience of homelessness to partner in creating change.
- **Objective 2** - Improve practice by statutory and non-statutory housing providers in responding to the needs of migrant women.
- **Objective 3** - Influence policy makers to introduce positive policy changes which increase housing options for migrant women.

Migrant Women + Housing Needs

Migrant women are impacted by the hostile environment policy, which prevents those with insecure immigration status from working, renting, driving, accessing health services, and from claiming benefits. Many women we work with are living in destitution and abject poverty. Migrant women who leave prison and detention centres are likely to become homeless. The cost-of-living crisis is bound to exacerbate poverty and destitution amongst migrant women.

Housing needs experienced by migrant women:

- Unsuitable accommodation (due to physical or mental health needs)
- Disrepair
- Lack of trauma and gender informed approaches
- Unsafe areas
- Being moved away from support systems

Factors impacting women's housing needs:

- Severe/complex MH needs
- Language barrier
- Issues with benefits (gaps, renewals, errors etc.)
- Children
- Physical health (both generally and resulting from disrepair in accommodation)
- Poverty/destitution
- Immigration (complex applications, no status, involvement with NASS system etc).
- Lack of access to legal aid solicitors
- Unable to access statutory support if NRPF

Hibiscus Client Focus Group, May 2023

“The council ended up sending us to the out of hours team who eventually found us something, but then they didn’t have the key, me and my son waited for 4 hours in the cold for them to sort it out – it was frustrating, I cried. Too many things were going on and happening in that moment. I couldn’t express how I feel. I didn’t know what to say to my son, it was already past 10 at night and we were out in the cold. You don’t have words to say, no words could come out of your mouth to say.”

“Priority need doesn’t mean anything.”

“The unknown & uncertainty is the worst part of feeling like you’re in an unsafe and temporary situation. It’s very scary waiting outside with your children, not knowing where we’re going to.”

“They didn’t give the opportunity to view [the property], I had to sign papers online before we could do anything. They said if I said no, I would be intentionally homeless.”

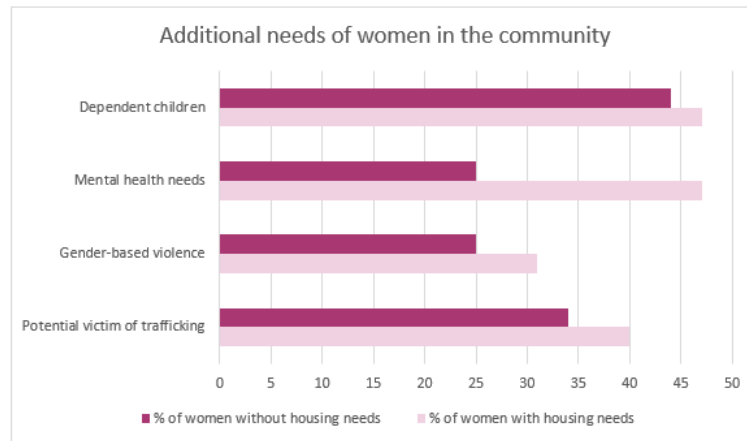
“You can’t forget those experiences; it’s staying in my head. You can’t do anything, you feel like you’re trapped, you don’t know what’s next. You don’t know what’s coming next. And are you going to get an accommodation in a safe house here or are you going to go outside? And now I’m staying in the safe house and I’m rebuilding myself.”

“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? I try not to get in the victim mentality and blame others or myself. “

Background & Initial Findings: Community Team

Of the 177 women supported by the community team from 1st April 2023 – 31st March 2024, 98 (55%) presented with housing needs.

Of these 98 women, approximately 49% have No Recourse to Public Funds.



Out of the 98 women with housing needs*:

- 46 women (47%) presented with mental health needs
- 39 women (40%) are victims of trafficking/modern slavery
- 30 women (31%) have experienced domestic violence/gender-based violence
- 46 women (47%) have dependent children

*some women may have overlapping needs and have been counted in more than one of the above categories

40 different nationalities were represented over the course of the year.

Of these nationalities, the most frequently seen was Albanian (20 women), followed by Nigerian (19 women) and then Romanian & Jamaican (5 women each).

What is the 'No Recourse to Public Funds' condition?

- A person has no recourse to public funds (NRPF) when they are subject to immigration control (defined in section 115 of the Immigration and Asylum Act 1999).
- If a person is subject to immigration control, they cannot claim public funds (such as benefits or housing assistance).

What issues does this cause?

- Increased risk of destitution, as there is no 'welfare safety net' for people to fall back on if their circumstances change.
- Can cause significant hardship and can affect all areas of someone's life (health, education, housing), and their ability to access support for victims of domestic abuse or if they're experiencing homelessness.

Supporting women with NRPF (No Recourse to Public Funds)

- Immigration advice:

- Firstly, it is very important that individual is supported to access immigration advice from regulated adviser.
 - This is an important step in avoiding/resolving destitution.
 - Signpost to immigration advisor who can advise on available routes to regularize status/lift NRPF condition.
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- Support from Social Services for families:

- Support available under section 17 of the Children Act 1989.
 - When a child is assessed as being 'in need' by social services, the family can be eligible for financial support and accommodation.
 - A child 'in need' could be homeless/destitute, parents not having the resources to meet the child's needs.
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- Support from Social Services for adults:

- Support available via the Care Act 2014, where an individual has care and/or support needs arising from a physical or mental illness.
- Social services can provide accommodation and financial support under section 18 of the Care Act to meet care & support needs of an individual where the eligibility criteria are met.
- Where eligibility criteria are not met, council can use power under section 19(1) of the Care Act to support in cases where an adult remains vulnerable because of wider concerns relating to their ill-health or disability, or if they are at risk of exploitation or harm.

- Support from charity organisations:

- Hosting schemes available (Room for Refugees, Refugees at Home etc.)
 - Support for victims of domestic violence (Support for Migrant Victims scheme, DDV concession)
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- Support for victims of trafficking:

- First responder referral to the National Referral Mechanism (NRM).
 - Safe house accommodation & financial support can be provided after a 'reasonable grounds decision has been made'.
 - If someone receives a 'positive conclusive grounds' decision, they may be eligible for discretionary leave to remain.
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- Support from the Home Office:

- Support available to destitute asylum seekers (S98 emergency support, S95 support).
- Asylum seekers who are Appeal Rights exhausted (ARE) might be entitled to S4 support.
- Schedule 10 immigration bail support might be an option for a person who has not made an asylum claim (i.e. overstayer) and who is on immigration bail.

Thank you!

The logo consists of a solid purple rectangular background. The word "Hibiscus" is written in a white, serif font, centered within the rectangle.

Hibiscus

Michaela Western

Hibiscus Initiatives

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